## FY 2021 Management Directive 715 (MD-715) Report



#### U.S. DEPARTMENT OF THE TREASURY OFFICE OF CIVIL RIGHTS AND DIVERSITY



**U.S. DEPARTMENT OF THE TREASURY** 

OFFICE OF CIVIL RIGHTS AND DIVERSITY

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## 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	N/A	1500 Pennsylvania Avenue,	Washington	DC	20220	TR	11001
Treasury		NW					

## Part B: Total Employment

		Temporary Workforce	Total Workforce
Number of Employees	95,369	776	96,145

## Part C.1: Head of Agency and Head of Agency Designee

Agency Leadership	Name	Title			
Head of Agency	Janet L. Yellen	Secretary, Department of the Treasury			
Head of Agency Designee	J. Trevor Norris	Acting 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 - Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO	Snider	Acting Director	0260	GS-15	202-622-0341	Snider.Page@treasury.gov
Director/Official	Page	(OCRD)				
Deputy Director	Tina	Acting Deputy	0260	GS-15	202-622-1079	Tina.Lancaster@treasury.gov
EEO	Lancaster	Director (OCRD)				
Affirmative	Tina	Assistant	0260	GS-15	202-622-1079	Tina.Lancaster@treasury.gov
Employment	Lancaster	Director for EEO				
Program		Programs				
Manager						
Complaint	Guizelous	Assistant	0260	GS-15	202-622-4178	Giuzelous.Molock@treasury.gov
Processing	(Guy) Molock	Director for				
Program		Complaints				
Manager		Program				
Manager	Tina	Assistant	0260	GS-15	202-622-1079	Tina.Lancaster@treasury.gov
of Special	Lancaster	Director for EEO				
Emphasis		Programs				
Programs						

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan - Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Diversity	Charmaine	EEO Specialist	0260	GS-14	202-622-8902	Charmaine.McDaniel@
& Inclusion	McDaniel					treasury.gov
Program						
Manager						
Disability	Elizabeth	EEO Specialist	0260	GS-14	202-868-9192	Elizabeth.Ortiz@treasury.gov
Program	Ortiz					
Manager						
(SEPM)						
Special	Elizabeth	EEO Specialist	0260	GS-14	202-868-9192	Elizabeth.Ortiz@treasury.gov
Placement	Ortiz					
Program						
Coordinator						
(Individuals with						
Disabilities)						
Reasonable	Elizabeth	EEO Specialist	0260	GS-14	202-868-9192	Elizabeth.Ortiz@treasury.gov
Accommodation	Ortiz					
Program						
Manager						
Anti-	Clarissa	EEO Specialist	0260	GS-14	512-499-5115	Clarissa.Lara@treasury.gov
Harassment	Lara					
Program						
Manager						
ADR Program	Clarissa	EEO Specialist	0260	GS-14	512-499-5115	Clarissa.Lara@treasury.gov
Manager	Lara					
Compliance	Ellen	EEO Specialist	0260	GS-14	202-622-0341	Ellen.Hawthorne-
Manager	Hawthorne-					Copenhaver@treasury.gov
	Copenhaver					
Principal MD-	Denise	EEO Specialist	0260	GS-14	202-622-9069	Denise.Bernfeld@treasury.gov
715 Preparer	Ratcliff					

# 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.

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

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

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

	Please respond Yes or No	Comments
Did the agency submit the following mandatory documents?		
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	Yes	FY 2022 Plan will be released in the 2nd
		Quarter
Anti-Harassment Policy and Procedures	Yes	Last approved on February 21, 2021
Reasonable Accommodation Procedures	Yes	Last approved by EEOC on February 3, 2021
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.

	Please respond Yes or No	Comments
Did the agency submit the following mandatory documents?		
Disabled Veterans Affirmative Action Program (DVAAP)	No	
Report		
Operational Plan for Increasing Employment of Individuals with	No	
Disabilities under Executive Order 13548		
Diversity and Inclusion Plan under Executive Order 13583	Yes	Treasury's Diversity and Inclusion (D&I) and
		EEO Strategic Plan (FY 2021-2024)
Diversity Policy Statement	Yes	Included in EEO Policy Statement.
Human Capital Strategic Plan	No	Human Capital (HC) goals are included within
		the new Treasury Strategic Plan released in
		2nd Quarter of FY 2022
EEO Strategic Plan	Yes	Treasury's D&I and EEO Strategic Plan (FY
		2021-2024)
Results from most recent Federal Employee Viewpoint Survey	No	
(FEVS) or Annual Employee Survey		

## Part E: Executive Summary

#### Introduction/Mission

The Department of the Treasury serves to protect the Nation's economic and financial infrastructure, support U.S. leadership in the global economy, and promote job growth and shared prosperity. To accomplish our mission, we must be able to recognize the needs of all citizens and understand the multi-cultural forces that shape the global economy. To effectively serve this diverse nation, our workforce must be representative of all segments of society, and we must give all employees the ability to compete on a fair and level playing field with equal opportunity for all.

To achieve a workforce that reflects our country's diversity, Treasury continuously works to align efforts to establish an equitable and civil culture and reduce barriers to racial equity. Treasury's efforts to identify opportunities, make recommendations, and develop and implement strategies to increase inclusivity and diversity at the agency are embedded in this report.

#### 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

Treasury is composed of eight bureaus and four separate Inspector General Offices, with diverse missions, from collecting taxes, to manufacturing currency, to paying our nation's bills and regulating our banking system. 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 Management Directive (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 Pandemic Relief (SIGPR), Special Inspector General for Troubled Asset Relief Program (SIGTARP), Treasury Inspector General for Tax Administration (TIGTA), and Alcohol and Tobacco Tax and Trade Bureau (TTB).

Each Treasury bureau, regardless of size, has its own distinct reporting structure for its EEO and Human Resource (HR) offices and programs. Each bureau sets its own policy and procedures regarding the hiring, recruitment, and retention of employees within the broad framework of the Department's Human Capital Strategy. The OCRD, part of the Departmental Offices' organizational structure, is primarily responsible for providing guidance and oversight to the bureaus' EEO offices. To learn more about the Department of the Treasury and its mission, and how the agency supports diversity and inclusion efforts, go to <u>About Treasury</u>.

#### 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. To learn more about OCRD programs, go to <u>About OCRD</u>.

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. To learn more about OCRD's External Civil Rights Program, go to <u>About External Civil Rights</u>.

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

#### Six Essential Elements for a Model EEO Program

The Six Essential Elements for a Model EEO Program outlines the foundation upon which an agency shall build an effective EEO Program. Treasury is required to review the agency's EEO and personnel programs, policies, and performance standards against all six elements to identify where the program can become more effective.

#### Essential Element A: Demonstrated Commitment from Agency Leadership

Secretary Yellen affirmed her commitment to EEO by issuing an EEO Policy on September 1, 2021. The EEO Policy, expresses the Department's support of diversity, equal employment opportunity, and a workplace free of discriminatory harassment. The EEO Policy was communicated via email to all Treasury employees and was posted to the internal and external Treasury websites.

Each of Treasury's bureaus heads committed to the principles of EEO and diversity by either issuing or reissuing their policy statements in support of EEO and diversity. Each bureau ensures that its own EEO Policy and Treasury's EEO Policy are disseminated to all new employees during orientation and are available on the internal and external websites, if applicable.

Bureaus ensure all newly promoted managers and supervisors receive copies of the bureau and Treasury EEO Policies as a reminder of their role and responsibility in providing a discrimination and harassment-free work environment.

Treasury and its bureaus make written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them through the internal and external websites.

Treasury's Reasonable Accommodation Policy and Procedures (Civil Rights Directive (CRD) 014: Voluntary Modification and Reasonable Accommodation Policy and Procedures) has been approved by EEOC and is pending final clearance before signature and release. In the interim, Treasury's CRD 012: Voluntary Modification and Reasonable Accommodation Policy, dated February 2020, is easily accessible to all employees and applicants via the internal and external websites. To further enhance Treasury's commitment to diversity, equity, inclusion, and accessibility, and in response to President Biden's administrative priorities outlined in Executive Orders (EO) 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and 14035: Advancing Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce, Treasury hired a Counselor for Racial Equity which is located within the Office of the Deputy Secretary.

#### Essential Element B: Integration of EEO into the Agency's Strategic Mission

The Secretary of the Treasury has delegated authority over all EEO matters to the Assistant Secretary for Management (ASM) through Treasury Order 102-02. The ASM, who reports directly to the Secretary and Deputy Secretary, is kept informed of EEO matters through regular communication with the Director of OCRD. The Director of OCRD, who reports directly to the ASM, provides the day-to-day management of the EEO, Diversity and Inclusion, and Civil Rights programs in Treasury, and has direct access to the ASM to provide him with critical information regarding the programs.

#### Department of the Treasury Strategic Plan

Through Treasury's Strategic Plan for Fiscal Years 2018-2022, the Department continues to prioritize the importance of building and maintaining a high-performing and diverse workforce. Achieving these objectives demands a concerted commitment in cultivating an organizational culture of inclusion where diverse talent is leveraged with continuous improvement in skills, learning, processes, and attitudes. Objective 5.1: Workforce Management of the Department's Strategic Plan outlines strategies to help the Department meet its plan. The purpose of this objective is to foster a culture of innovation to hire, engage, develop, and optimize a diverse workforce with the competencies necessary to accomplish the Departments mission. The Departments strategy (5.1.C) is to improve diversity and engagement through transparency, fairness, and inclusion.

#### Treasury's Diversity and Inclusion (D&I) and Equal Employment Opportunity Strategic Plan

In FY 2021, OCRD along with bureau EEO and Diversity and Inclusion Officers implemented Treasury's first combined Diversity and Inclusion (D&I) and Equal Employment Opportunity Strategic Plan for Fiscal Years 2021-2024. The Strategic Plan identified a comprehensive set of six goals that highlight both D&I and EEO priorities and promotes the cross collaboration necessary to include people with a variety of talents and from a variety of backgrounds, resulting in a workplace where people can feel respected and accepted. Treasury's D&I and EEO Strategic Plan outlines the second phase of the President's 2011 EO 13583, Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce. EO 13583 directs executive departments and agencies to develop and implement a comprehensive, integrated, and strategic plan that focuses on diversity and inclusion as a key component of their human resources strategies.

The following Goals and Priorities are identified in the Strategic Plan:

Goal 1: Demonstrate Diversity & Inclusion as Mission Critical Values

Priority 1.1: Leadership Responsibility and Transparency Priority 1.2: Data-Based Research and Accountability

• Goal 2: Enhance Communication, Collaboration, and Consistency

Priority 2.1: Establish Role Clarity to Enhance Collaboration Between Human Resources, Equal Employment
Opportunity and Diversity and Inclusion Offices
Priority 2.2: Communicate Importance of D&I, EEO, and Affirmative Employment to Treasury's Mission
Priority 2.3: Support and Strengthen Internal Inclusion Efforts
Priority 2.4: Create Memoranda of Understanding with Outside Organizations

#### • Goal 3: Center Safety, Fairness and Trust

Priority 3.1: Facilitate Inclusion and Trust in Day to Day Work Priority 3.2: Create Space for and Listen to Candid Employee Feedback to Improve Customer Experience

#### • Goal 4: Comply with Regulatory Mandates and Departmental Policies

Priority 4.1: Process EEO Complaints of Discrimination and Reporting Complaint Activity Priority 4.2: Increase Alternative Dispute Resolution (ADR) Participation and Settlement Rates Priority 4.3: Reduce Processing Times for Reasonable Accommodation Requests

#### • Goal 5: Educate and Engage the Treasury Workforce

Priority 5.1: Training and Education for All Staff

#### • Goal 6: Leverage Technology

Priority 6.1: Increase Use of Information Technology to Improve Efficiency of EEO Programs and Analyze Trends in Program Data and Workforce Demographics Priority 6.2: Promote a Digital-First Culture that Prioritizes Stakeholder Interactions and Experiences

The priority over the next few years will focus on leadership accountability, responsibility and transparency; communicating the importance of Diversity, Inclusion and EEO; collaborating with Human Resources; facilitating inclusion and trust in daily interactions; increasing compliance with federal regulatory EEO Complaints and Departmental policies; providing educational opportunities to the workforce on creating an inclusive workplace; and increasing the use of information technology to improve the efficiency of EEO Programs.

Throughout FY 2021, OCRD's Director of EEO Programs met with Treasury Bureau EEO, Diversity and Human Resource Officers to discuss the implementation plan and recommend strategies for continued improvement. Together we will continue to focus efforts on improving Treasury's overall results for FY 2022.

After the release of the Government-Wide Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce in FY 2022, OCRD established a cross-agency approach to align the Treasury's FY 2021-2024 D&I and EEO Strategic Plan with Executive Order (EO) 14035: Advancing Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce and OMB implementation guidance.

#### Treasury's Historically Black Colleges and Universities Competitive Strategy Framework Plan

In FY 2020, through its FY 2021-2022 Historically Black Colleges and Universities (HBCUs) Competitive Strategy Framework Plan, Treasury required its bureaus to set and track internal goals that provide for regular outreach events with HBCUs. Treasury bureaus are required to identify HBCUs with areas of focus that align with the bureaus' key job series to build lasting partnerships. Treasury and its bureaus committed to conducting direct, targeted outreach to HBCU students and recent graduates for Treasury employment opportunities.

#### Internship Programs

Internship programs play a significant role in ensuring that a diverse pipeline of talent is available to fill mission critical occupations being vacated by an aging workforce. Throughout FY 2021, Treasury and its bureaus continued to establish and maintain partnerships with existing external internship programs that attract highly qualified and diverse students. Internship programs such as the Pathways Program, Operation Warfighter, and the Workforce Recruitment Program (WRP) continue to provide Treasury and its bureaus an avenue to identify and expand the pool of potential candidates and grow new talent.

Treasury's Departmental Offices established the Treasury-wide Treasury Scholars Program through use of a blanket purchase agreement. Through this program, all Treasury bureaus have existing partnerships with the following organizations:

- Hispanic Association of Colleges and Universities (HACU),
- INROADS, and
- The Washington Center.

Bureaus also maintain their own partnerships with diverse organizations, for example:

- FinCEN has established partnerships with HBCUs and Gallaudet University;
- FS maintains partnerships with the Hispanic Serving Institutions National Internship Program (HSINIP) and Washington Internships for Native Students (WINS);
- IRS maintain a partnership with the Society of American Indian Government Employees (SAIGE); and
- BEP maintained a partnership with Minority Serving Institutions as part of a five-year contract to recruit paid interns.

#### Training

OCRD's Complaints Program coordinates annual EEO Counselor Refresher training for all bureau EEO Counselors to ensure all counselors receive the required training to maintain appropriate certification.

#### Essential Element C: Management and Program Accountability

Treasury exercises program oversight and accountability of bureau programs in accordance with Treasury's policy on Departmental Oversight of Management Functions (HCIS 250.1), which authorizes the ASM and the Departmental Functional Program Heads to establish Department-wide strategic goals and objectives, as well as individual performance expectations and uniform language, to be incorporated into the performance plans of Bureau Functional Program Heads, such as the bureau EEO Officers. The policy calls for the ASM to participate in the recruitment, selection, retention, and performance alignment of bureau management officials to include bureau EEO/Diversity Officers. As a result of the implementation of the policy, Treasury and the bureaus benefit from increased collaboration, greater transparency of information, data, goals, and plans, more efficient sharing of resources, and greater emphasis on succession planning.

In FY 2021, Treasury's OCRD continued with the Bureau Audit Program by auditing the Departmental Offices (DO) bureau; additionally, OCRD participated in the Human Capital Evaluations of the Mint and IRS HR, D&I, and EEO programs. The Bureau Audit includes a review of each phase of Treasury bureaus' EEO programs, including diversity and inclusion (D&I), EEO complaint processes, and building accessibility reviews to ensure compliance with the applicable law and regulations. Among those topics for review is Performance Standards established for Managers, Supervisors, and Senior Executive Service (SES) members to ensure performance commitments include mandatory EEO and D&I elements. At the conclusion of the bureau audit, bureaus receive a report identifying any program deficiencies, an evaluation of the effectiveness of their efforts to achieve and maintain a Model EEO Program, and a list of recommendations for improvement.

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

Treasury is actively engaged with the workforce and senior leaders; management and senior leaders are informed of trends within their workforce throughout the year by OCRD and respective bureau EEO Officers by use of Quarterly Progress Reviews (QPRs), deep-dive workforce analysis (Diversity Dashboards), OCRD Advisory newsletters, and Managers Alerts.

Treasury publishes OCRD Advisory Newsletters to the workforce, as well as Manager's Alerts to managers and supervisors, on information rele-vant to EEO complaint program matters, changes to policy and/or procedures, workforce statistics, and important upcoming agency events/activities, including hiring events and use of special hiring authorities.

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

#### Barrier Analysis Efforts

In FY 2020, OCRD established a Treasury-wide Barrier Analysis Working Group (BAWG), consisting of EEO personnel from each bureau, tasked with identifying barriers for female employment in the General Schedule (GS)-13 and above grade levels. In FY 2021, each bureau reviewed workforce data and identified one or two mission-critical and/or most populous occupations where female participation rates at the GS-13 and above grade levels consistently falls below the respective availability rate. Bureaus have formed sub-working groups consisting of sub-component EEO personnel (if applicable), HR, and hiring managers/supervisors. Bureaus are analyzing their data to identify triggers within various phases of employment, including recruitment and outreach. The Treasury-wide BAWG meets monthly to discuss plans and progress, as well as to identify any challenges to completing the barrier analysis efforts.

Treasury bureaus' missions vary greatly, from collecting taxes, to manufacturing currency, to paying our nation's bills, and regulating our banking system. Because each bureau has a different mission, each bureau's workforce is also different, and therefore, each bureau has different conditions, practices, and policies that affect each bureau individually. Bureaus are required by EEOC and OCRD to conduct bureau-level barrier analysis on known triggers in an effort to identify and eliminate potential barriers.

#### Special Emphasis Programs

OCRD is part of DO and provides policy, oversight, and technical guidance to Treasury bureaus, to include special emphasis program (SEP) areas. SEPs provide a framework for incorporating EEO principles of fairness and equal opportunity into the fabric of the Department and its bureaus, across the employment spectrum.

Established throughout the bureaus, the three federally mandated SEPs – the Hispanic Employment Program, the Federal Women's Program, and the Persons with Disabilities Program – reflect the Department's commitment to equal opportunity, dignity, and respect.

At their discretion, individual bureaus have also established other SEPs such as African American, Asian American/ Pacific Islander, American Indian/Alaska Native employment programs, and Lesbian, Gay, Bi-sexual, Transgender, and Queer (LGBTQI+) employment programs.

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

OCRD revised its LGBTQ Cultural Competency training for online use and made it accessible to all Treasury employees using its Integrated Management Learning System. The training was developed in FY 2020 and launched in early FY 2021 and reintroduced during LGBTQ Pride Month events.

In FY 2021, the Treasury Asian Pacific American (TAPA) Employee Resource Group (ERG) organized the Asian American and Native American Pacific Islander (AANAPI) History program, Anti-Asian American Pacific Islander (AAPI) Discrimination and Introduction to Bystander Intervention Training, and AAPI Panel discussion on increased discrimination against AAPI communities due to COVID.

#### Employee Resource Groups

Treasury has two minority-serving ERGs: Hispanic Employee Resource Group (Adelante) and TAPA. Other ERGs include: the Veteran Employee Resource Group (VERG), LGBTQ Employee Resource Group (PRISM), and the Law Enforcement Officers ERG (LEO). These Treasury-wide ERGs provide Treasury employees support and provides the opportunity to receive guidance for success in their employment. ERGs partner with OCRD, the principal consultant to Treasury's organizational officials, and senior managers, to provide a direct pipeline to the heads of the agency for employees to recommend changes to enhance and support diversity and inclusion efforts in the agency.

Additionally, many of the Treasury bureaus have a variety of bureau-specific ERGs available to their respective workforce.

In FY 2021, OCRD announced interest in launching a new Treasury-wide ERG for Individuals with Disabilities.

To include and engage everyone in the workforce, Treasury launched a campaign for leadership to the Adelante and the TAPA ERGs. The leadership for each of the Treasury-wide ERGs are selected as collateral duty assignments. Campaigns are extended to other Treasury-wide ERGs like LEO, PRISM, and VERG.

#### Shared Neutrals Program

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

#### Training

In FY 2020, OCRD developed an "LGBTQ – Nondiscrimination in the Federal Workplace" training for the Integrated Talent Management (ITM) system. In FY 2021, OCRD marketed and recommended the training, which is available to all Treasury-employees.

In FY 2021, Treasury continued to offer Civil Treatment for Employees and Leaders training by a cadre of in-house trainers. This training prepared Treasury employees to teach D&I concepts to the workforce. Plans for providing additional training were placed on hold due to the pandemic but are expected to continue where possible in FY 2022.

#### Essential Element E: Efficiency

Treasury has sufficient staffing, funding, and authority to comply with the time frames established in EEOC regulations (29 CFR §1614) for processing EEO complaints of employment discrimination. Treasury promotes and utilizes an efficient, fair, and impartial dispute resolution process and has a system in place for evaluating the impact and effectiveness of the Department's EEO complaint processing program. The Department has an established EEO complaint program separate from the Department's defensive function.

Regarding discrimination complaints, OCRD is responsible for providing authoritative advice to bureau EEO staff and for processing all administrative EEO complaints based on race, color, national origin, religion, sex (including sexual orientation, gender identity, and pregnancy), age, disability, protected genetic information, reprisal, and parental status. OCRD also develops complaint policies and procedures and produces high quality final agency decisions.

In addition, OCRD oversees the Department's EEO complaint appeal process, tracks all appeal decisions, and monitors compliance with decisions issued by the EEOC.

The Department maintains special procedures for handling complaints on the bases of parental status. This basis was

added in response to Presidential Executive Order 13152, amending Executive Order 11478.

OCRD continued to implement principles which support the use of data and evidence-based decision making by continuing a partnership with the Treasury's Enterprise Data Management (EDM) office in FY 2021. Bureau Human Capital Offices focused on consolidating data sources and data products from a technology perspective, whereas the use of the EDM platform is a primary data hub and system to provide reports/dashboards. In FY 2021, the EDM worked with OCRD to provide access to EEO data for the IRS Human Capital Data Management Technology (HCDMT) team, where consolidate/unified MD-715 profiles and Exit Surveys are included enhancing their efforts to address reporting (and governance).

OCRD collaborated with the EDM in an effort to increase inter-agency communication and share best practices with agencies of similar size. In FY 2021, the two offices responded to three inter-agency knowledge-share sessions to share best practices for workforce data collection, retrieval, and analysis. OCRD will continue inter-agency communications in following years.

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

Treasury remains compliant with the law, including EEOC regulations, directives, orders, and other guidance. The Department continues to post all required No FEAR Act information, provide required training to the workforce, and consistently file timely annual required reports, including the MD-715 and EEOC Form 462 Reports.

During FY 2021, the Department conducted its FY 2020 State of the Agency Briefing with the ASM in April 2021 and with the Department's Secretary and Deputy Secretary in September 2021.

In FY 2021, OCRD continued the practice of providing bureau EEO Officials and MD-715 Preparers with direct feedback on the previous year's annual MD-715 report. OCRD reviews each bureau's MD-715 Report, provides technical assistance and guidance, and makes recommendations for ensuring the technical elements required future reports.

#### **Employee Perspective Surveys**

#### Diversity and Inclusion (New IQ) Index

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

In FY 2020, the Federal Employee Viewpoint Survey (FEVS) was modified to assess challenges of the COVID-19 pandemic. The shortened standard sections allowed for a new section on how the COVID-19 pandemic impacted individual work and wellbeing and omitted the Diversity and Inclusion Index categories (Fairness, Open-Minded, Cooperative, Supportive, Empowerment). However, the FY 2021 FEVS questions were slightly changed to help us better understand perceptions on leadership, work-life balance, supervisory relationships, performance management and to help senior leadership plan. It will also include several questions about how the COVID-19 pandemic has impacted employees, their work, and the agency.

The absence of the New IQ questions on the FY 2020 and FY 2021 FEVS inhibits the EEO and D&I community from gauging employees' perspectives in this critical area and greatly impacted the community's work in advancing diversity and inclusion in accordance with President Biden's EO 14035. In FY 2021, Treasury's Deputy Assistant Secretary for Human Resources (DASHR), Departmental Offices' Office of Minority and Women Inclusion (OMWI), and OCRD contacted OPM to administer the New IQ questions as a separate survey for Treasury bureaus, which was approved

by Secretary Yellen. The survey is expected to be administered to a random sample of about 10 percent of Treasury employees by OPM and will launch in February of 2022. In addition to the New IQ questions, the survey will include a small number of diversity questions, as well as a few questions that will obtain an understanding of the state of data tools and training in the agency.

#### Exit Survey Responses

In FY 2021, Treasury continued use of its automated Exit Survey tool that was deployed in FY 2010. The Exit Survey results are a valuable source for guiding bureau HR and EEO staff, as well as managers towards identifying potential barriers in the areas of retention, career advancement, professional development, and provision of reasonable accommodations.

During the reporting period, a total of 9,646<sup>1</sup> permanent employees separated from Treasury; of those permanent separations, 8,938 were voluntary separations and 708 were involuntary. Of the 8,938 voluntarily separating permanent employees, Treasury received 1,885 (21.09%) responses.

While the FY 2021 Treasury permanent workforce was 61.38% female and 64.36% of voluntarily separating permanent employees were female, 57.19% of the Exit Survey respondents were female.

	<b>Respondent Participation</b>	Separation Rate	Workforce Participation				
Hispanic	8.01%	13.43%	13.00%				
White	63.08%	51.73%	51.06%				
Black	21.70%	28.48%	27.68%				
Asian	4.83%	4.82%	6.82%				
NHOPI, AIAN, Two+*	2.39%	1.54%	1.43%				
PWD	8.12%	13.90%	13.86%				
*NHOPI, AIAN, Two+ refers to I	Native Hawaiian/Other Pacific Isla	nder, American Indian/Alaskan N	Native, and Two or More Races				

Of the respondents, 45.04% were age 60 and Over, followed by the 50-59 age group (29.44%). The category for 60 and Over for voluntarily separating permanent employees had a length of service of more than 25 years (48.54%), followed by employees who had 13-25 years of service (20.16%). Additionally, respondents in the GS 13-15 or equivalent grade levels rated (44.30%), followed by the GS 5-8 or equivalent grade level (26.95%).

The largest percentage of respondents, 65.99%, were separating to retire, followed by 8.44% who were transferring to another federal agency. Of those employees who were separating to retire, 35.45% have been eligible to retire for five or more years while 39.87% were eligible for one to four years, and 24.68% were eligible to retire for less than one year. Of the retiring respondents, 37.46% of the retiring employees indicated they would be interested in becoming a reemployed annuitant.

The element most cited as having an impact on the decision to separate was "Job-Related Stress," where 54.27% of the respondents stated that it had an impact on the decision to separate. Following "Job-Related Stress," "Office Morale" (36.34%) and "Reasonableness of Workload" (35.76%) were also listed as having an impact on the decision to separate.

<sup>1</sup> Data does not include those employees separating from the Special Inspector General for the Troubled Asset Relief Program (10) or the Office of the Inspector General (14).

Element	Percentage of Respondents indicating Impact
Job-related stress	54.27%
My office's morale	36.34%
Reasonableness of my workload	35.76%
My pay level in relation to my job responsibilities and performance	34.80%
My ability to participate in decision-making	33.79%
Resources available to do my job	33.63%

A high percentage of separating employees responded that their work experience was generally positive (84.56%); 63.71% stated that they would return to work for Treasury in the future, and 82.39% stated they would recommend Treasury as a good place to work.

#### Workforce Analysis

The following are Treasury's workforce demographic trends over a 10-year period, FY 2012 to FY 2021. The area where participation rates have been of most concern government-wide and at the Department have been the distribution of Women and Persons of Color in the General Schedule (GS) grades 13 through 15 and the Senior Executive Service (SES), and in the equivalent pay plans for use by Treasury only (OR, TR, IR, and NB)<sup>2</sup>, as well as the participation rates for Hispanics in the Bureaus and within the mission critical occupations.

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' effort 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 Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD).

Treasury and its bureaus continue to utilize the Relevant Civilian Labor Force (RCLF) tool, updated annually at the end of each fiscal year, which provides a more realistic benchmark comparator. The RCLF is based off the National Civilian Labor Force (CLF); 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.

At the end of FY 2021, Treasury had 96,145 employees, a decrease of 1,244 (-1.28 percent net change) employees from FY 2020. Treasury's permanent workforce increased by 728 employees from FY 2020 to FY 2021 with 95,369 employees at the end of FY 2021, a net change of 0.77 percent. Treasury's temporary workforce experienced a significant decrease from 2,748 in FY 2020 to 776 in FY 2021, a net change of -71.76 percent. The following workforce demographics specifically relate to the permanent workforce.

#### **Overall Participation Rates**

A comparison of FY 2021 participation rates in Treasury's permanent workforce for Males and Females shows little change since FY 2012, though the participation rates for Females decreased from 62.87 percent in FY 2012 to 61.38 percent in FY 2021. The Male participation rate increased from 37.13 percent in FY 2012 to 38.63 percent in FY 2021. Treasury's FY 2021 Female participation rate (62.87 percent) exceed the RCLF availability rate of 59.47 percent, while the Male participation rate (38.62 percent) falls below the RCLF availability rate of 40.53 percent.

2 OR: This code is used by employees of the Office of Financial Research (OFR) within the Department of the Treasury only. TR: This code is used by employees of the Mint and BEP within the Department of the Treasury only.

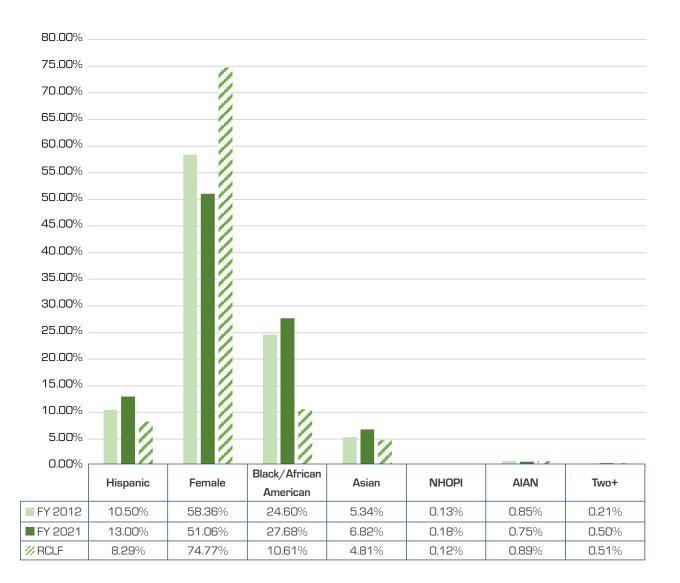
IR: This code is used by employees of the IRS within the Department of the Treasury only.

NB: This code is used by employees of the OCC within the Department of the Treasury only.

#### FY 2021 Participation Rates by Sex



Apart from White and American Indian/Alaskan Native, participation rates for all Ethnicity/Race Indicator (ERI) categories have increased from FY 2012 to FY 2021. From FY 2012 to FY 2021, Hispanic participation rates increased from 10.50 percent to 13.00 percent, and exceed the RCLF availability rate of 8.29 percent. White participation rates decreased from 58.36 percent in FY 2012 to 51.06 percent in FY 2021, which falls below the RCLF availability rate of 74.77%. The participation rate for Black/African American employees increased from 24.60 percent in FY 2012 to 27.68 percent in FY 2021 and exceeds the RCLF availability rate of 10.61 percent. From FY 2012 to FY 2021, Asian participation rates increased from 5.34 percent to 6.82 percent, and exceed the RCLF availability rate of 4.81 percent. Native Hawaiian/Other Pacific Islander participation rates increased from 0.13 percent in FY 2012 to 0.18 percent in FY 2021 and exceeds the RCLF availability rate of 0.12 percent. The participation rate for Maerican Indian/Alaskan Native employees decreased from 0.85 percent in FY 2012 to 0.75 percent in FY 2021 and exceeds from 0.85 percent in FY 2012 to 0.75 percent in FY 2021 and exceeds from 0.85 percent in FY 2012 to 0.75 percent in FY 2021 and falls below the RCLF availability rate of 0.89 percent. While the participation rate for Two or More Races employees increased from 0.21 percent in FY 2012 to 0.50 percent in FY 2021, the participation rate falls just short of the RCLF availability rate of 0.51 percent.



#### Participation Rates by ERI/Sex<sup>3</sup>

Treasury-wide, participation rates for Hispanic Males and Females, Black Males and Females, Asian Males and Females, and Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native, and Two or More Races Males and Females have increased from FY 2012 to FY 2021. In FY 2021, participation rates for all ERI/Sex categories except White Males and Females and Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native, and Two or More Races Males and Two or More Races Males and Females and Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native, and Two or More Races Males and Females exceed the respective RCLF availability rates.

The participation rates for Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native, and Two or More Races Males and Females fall just below the respective RCLF availability rates: Males, 0.49 percent vs. 0.53 percent RCLF; and Females, 0.94 percent vs. 0.98 percent RCLF.

<sup>3</sup> Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native, and Two or More Races participation rates are combined into one category for this section.

The participation rate for White Males, 23.55 percent, falls below the 31.38 percent RCLF availability rate, while the participation rate for White Females, 27.51 percent, falls below the 43.39 percent RCLF availability rate.

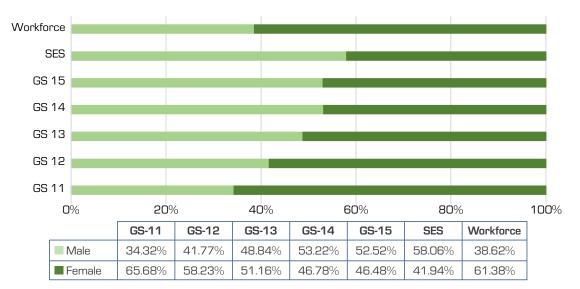


#### FY 2021 Participation Rates by ERI/Sex

Grade Distribution by Sex and ERI<sup>4</sup>

The distribution of Females and Persons of Color (POC) in Treasury's workforce has been an area of focus for the Department. Yearly, OCRD monitors the distribution of Females and POC in the feeder pools that lead to SES positions.

In FY 2021, the Female participation rate decreases from 65.68 percent in the GS-11 grade to 41.94 percent in the SES grade level. Female participation falls below the Workforce availability rate in all GS 12 and above grade levels.



#### FY 2021 Grade Distribution (GS 11 and Above) by Sex

4 Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native, and Two or More Races participation rates are combined into one category for this section

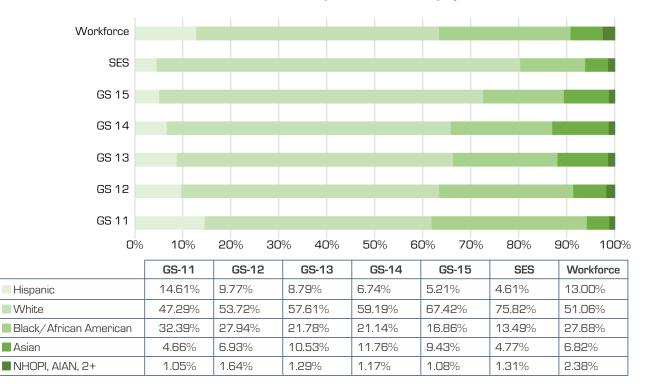
In FY 2021, the Hispanic participation rate decreases from 14.61 percent in the GS-11 grade to 4.61 percent in the SES grade level; Hispanic participation falls below the Workforce availability rate in all GS 12 and above grade levels.

The White participation rate increases from 47.29 percent in the GS-11 grade to 75.82 percent in the SES grade level; White participation exceeds the Workforce availability rate in all GS-12 and above grade levels.

The Black/African American participation rate decreases from 32.39 percent in the GS-11 grade to 13.49 percent in the SES grade level; Black/African American participation falls below the Workforce availability rate in all GS-13 and above grade levels.

The Asian participation rate increases from 4.66 percent in the GS-11 grade level to 11.76 percent at the GS-14 grade level, afterwards decreasing again to 4.77 percent at the SES grade level; Asian participation exceeds the Workforce availability rate in the GS-12 through GS-15 grade levels.

The Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native, and Two or More Races participation rate increases from 1.05 percent in the GS-11 grade level to 1.64 percent in the GS 12 grade level, afterwards decreasing to 1.08 percent in the GS-15 grade level. Participation increases again at the SES grade level (1.31 percent). Participation for Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native, and Two or More Races falls below the Workforce availability rate in all GS-11 and above grade levels.



#### FY 2021 Grade Distribution (GS 11 and Above) by ERI

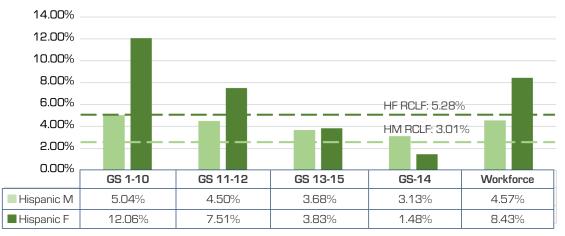
#### Treasury Hispanic Workforce

The Hispanic workforce within Treasury continues to be an area of focus for Treasury and its bureaus, specifically in the GS-13 and above grade levels. Through FY 2021, based on the joint EEOC]/Office of Personnel Management (OPM) memorandum issued on January 18, 2017, 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.

The Treasury Hispanic participation rate, 13.00 percent, exceeds the RCLF availability rate of 8.29 percent. In FY 2021, the Hispanic participation rate for New Hires was 16.62 percent, exceeding the RCLF availability rate of 8.29 percent. The Hispanic participation rate for Separations was 13.33 percent, slightly exceeding the workforce availability rate (13.00 percent).

The participation rates for Hispanic Males and Females exceed the respective RCLF availability rates at the GS 1-10 and GS 11-12 grade clusters. At the GS 13-15 and SES grade levels, the participation rates for Hispanic Males exceeds the RCLF availability rate, while the participation rates for Hispanic Females falls below the RCLF availability rate.

Hispanic Female participation rates decrease by 10.58 percent from 12.06 percent in the GS 1-10 grade cluster to 1.48 percent at the SES grade level. Hispanic Male participation rates decrease by 1.91 percent from 5.04 percent in the GS 1-10 grade cluster to 3.13 percent at the SES grade level.



#### FY 2021 Hispanic Participation by Grade

The Hispanic participation rates exceed the respective RCLF availability rate in nine Treasury bureaus: Bureau of Engraving and Printing (BEP), Internal Revenue Service (IRS), IRS – Office of the Chief Counsel (IRS-CC), U.S. Mint (Mint), Office of the Comptroller of the Currency (OCC), Office of the Inspector General (OIG), Special Inspector General for the Troubled Asset Relief Program (SIGTARP), Treasury Inspector General for Tax Administration (TIGTA), and the Alcohol and Tobacco Tax and Trade Bureau (TTB).

The Treasury Hispanic Male participation rate, 4.57 percent, exceeds the RCLF availability rate of 3.01 percent. The Hispanic Male participation rates exceed the respective RCLF availability rate in nine Treasury bureaus: BEP, FinCEN, IRS, Mint, OCC, OIG, SIGTARP, TIGTA, and TTB.

The Treasury Hispanic Female participation rate, 8.43 percent, exceeds the RCLF availability rate of 5.28 percent. The Hispanic Female participation rates exceed the respective RCLF availability rate in five Treasury bureaus: IRS, IRS-CC, Mint, OIG, and TTB.

Bureau Name	Total	RCLF	Hispanic	RCLF	Hispanic	RCLF
	Hispanic		Male		Female	
BEP	9.59%	9.13%	7.76%	6.20%	1.83%	2.92%
DO	5.58%	6.79%	3.18%	3.31%	2.40%	3.48%
FinCEN	4.66%	7.45%	3.58%	3.37%	1.08%	4.08%
FS	3.85%	6.91%	2.05%	2.76%	1.80%	4.15%
IRS	14.24%	8.55%	4.65%	2.90%	9.59%	5.65%
IRS-CC	5.57%	5.06%	2.19%	2.37%	3.38%	2.68%
Mint	11.98%	9.61%	7.88%	6.61%	4.10%	3.00%
OCC	7.95%	7.12%	4.51%	2.68%	3.44%	4.44%
OIG	7.84%	6.25%	3.43%	2.44%	4.41%	3.81%
SIGPR	20.00%	*	17.14%	*	2.86%	*
SIGTARP	9.38%	6.10%	9.38%	3.02%	0.00%	3.08%
TIGTA	7.25%	6.71%	4.10%	2.65%	3.15%	4.06%
TTB	7.99%	6.51%	4.10%	2.86%	3.89%	3.65%
Treasury	13.00%	8.29%	4.57%	3.01%	8.43%	5.28%

\* SIGPR was established in FY 2021 and therefore does not have its own RCLF calculation at this time. SIGPR's RCLF will be included in FY 2022 calculations.

Treasury bureau geographical duty stations play a significant role in the diversity of the workforce. While BEP, IRS, and Mint have multiple duty stations in diverse geographical areas, FS' primary duty station, Parkersburg, West Virginia, remains a non-diverse location, providing limited opportunities to recruit, hire, and maintain a diverse workforce.

Within Treasury's Major Occupations, Hispanic participation rates exceed the respective Occupational Civilian Labor Force (OCLF) availability rate in eight occupations: 0301: Misc. Administration and Program; 0340: Program Management; 0343: Management and Program Analyst; 0501: Financial Administration and Program; 0511: Auditing; 0570: Bank Examiner; 0905: General Attorney; and 1169: Revenue Officer.

Hispanic Male participation rates exceed the respective OCLF availability rate in nine of Treasury's major occupations: 0110: Economist, 0301: Misc. Administration and Program; 0340: Program Management; 0343: Management and Program Analyst; 0501: Financial Administration and Program; 0511: Auditing; 0570: Bank Examiner; 0905: General Attorney; and 1169: Revenue Officer.

Hispanic Female participation rates exceed the respective OCLF availability rate in seven of Treasury's major occupations: 0301: Misc. Administration and Program; 0343: Management and Program Analyst; 0501: Financial Administration and Program; 0511: Auditing; 0905: General Attorney; 1169: Revenue Officer; and 1811: Criminal Investigating.

Occ. Series	Total	OCLF	Hispanic	OCLF	Hispanic	OCLF
	Hispanic		Male		Female	
0110: Economist	4.67%	5.10%	4.09%	3.30%	0.58%	1.80%
0301: Misc. Admin. & Program	9.06%	8.60%	3.17%	2.80%	5.89%	5.80%
0340: Program Management	8.96%	8.60%	3.40%	2.80%	5.56%	5.80%
0343: Mgmt. Program Analyst	7.40%	4.60%	2.58%	2.40%	4.82%	2.20%
0501: Financial Admin and Pgm.	14.25%	9.80%	4.92%	4.10%	9.33%	5.70%
0511: Auditing	8.22%	6.10%	4.22%	2.20%	4.00%	3.90%

Occ. Series	Total	OCLF	Hispanic	OCLF	Hispanic	OCLF
	Hispanic		Male		Female	
0570: Bank Examiner	7.91%	6.80%	4.89%	3.10%	3.02%	3.70%
0905: General Attorney	5.03%	4.30%	2.66%	2.50%	2.37%	1.80%
1169: Revenue Officer	15.27%	10.70%	6.52%	4.70%	8.75%	6.00%
1811: Criminal Investigating	9.41%	11.20%	6.26%	8.20%	3.15%	3.00%
2210: Info Technology Mgmt.	6.15%	7.60%	4.17%	5.40%	1.98%	2.20%

#### **Disability Employment Program**

In FY 2021, Treasury exceeded all established goals for PWD and PWTD.

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 2021, Treasury is pleased to note that we have exceeded the 12 percent goal of participation rates for PWD (13.86 percent) and the goal of 2 percent for PWTD (3.36 percent). Treasury also exceeded the new hire goals of 12 percent PWD and 2 percent PWTD with 13.01 percent of hires being PWD and 2.48 percent were PWTD.

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

Bureau	Total	PWD #	<b>PWD</b> %	PWTD #	PWTD %
BEP	1803	355	19.69	45	2.50
DO	1952	204	10.45	31	1.59
FINCEN	279	47	16.85	9	3.23
FS	3618	967	26.73	164	4.53
IRS	79028	10524	13.32	2579	3.49
IRS-CC	2101	197	9.23	39	1.86
MINT	1586	373	23.52	68	4.29
OCC	3547	342	9.64	64	1.80
OIG	204	44	21.57	8	3.92
SIGT	32	1	3.13	0	0.00
TIGTA	731	87	11.90	6	0.82
ТТВ	488	78	15.98	13	2.66
Total	95369	13216	13.86	3206	3.36

#### FY 2021 Disability Participation Rates by Bureau

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 grades, 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 (14.69 percent) and PWTD (3.98 percent) at the grades GS-10 and below exceed the goals of 12 percent and 2 percent. The participation rate for PWD (12.84 percent) and PWTD (2.70 percent) at the grades GS-11 and above exceed the goals of 12 percent and 2 percent.

During FY 2021, Treasury continued to utilize OPM's Talent Portal located on USAJobs as a resume mining database for 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 percent or more compensable disability.

OCRD has posted its Personal Assistance Service (PAS) policy and procedures to the internal and external Treasury websites. The external link is <u>https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/eeo</u> <u>programs.aspx</u>. In addition, the Department continued 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.

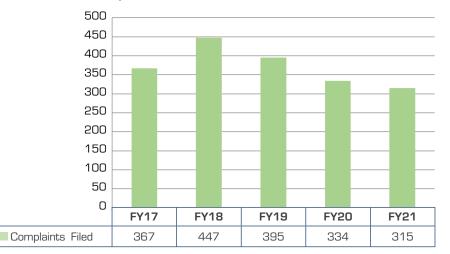
OCRD promotes awareness on disability topics within many of its publications: quarterly newsletters, OCRD Advisory, and Manager's Alerts. Through these varied sources, the Department ensures that hiring managers are informed of and encouraged to use various resources and tools that help with the employment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

#### **Treasury Complaint Program**

OCRD tracks all EEO complaints filed by Treasury employees and applicants for employment with an integrated data management complaint system (iComplaints). OCRD has a contract in place that serves as the systems administrator for the iComplaints system.

#### Complaint Activity

Treasury timely submitted the EEOC 462 Report in October 2020. The 462 Report is an annual assessment of the agency's formal and informal complaints. This report also provides the methods used for resolution prior to and during the complaint process. During FY 2021, the number of EEO complaints filed by Treasury employees and applicants (315) decreased by 6% when compared to the number of complaints filed in FY 2020 (334).



#### Complaints Filed FY 2017 to FY 2021

At the close of FY 2021, the Department had 464 complaints pending that were carried over to FY 2020. During FY 2021, 315 complaints were filed, with an additional seven cases remanded back to the agency by the EEOC, and Treasury closed 398 complaints.

In FY 2021, the Department's bureaus timely completed 99% of EEO counselings.

By the end of FY 2021, the Department completed 232 investigations. There were 175 investigations (75%) completed within 180 days, 54 (23%) completed between 181-360 days and 3 (1%) were completed in 361 or more days. Overall, 94% (219) of all investigations were timely completed.

In FY 2021, the Department issued 155 final agency decisions in cases where a hearing was not requested. Of these decisions, 112 were merit decisions and 43 were procedural dismissals. In FY 2021, two (2) final agency decisions resulted in findings of discrimination.

Overall, in FY 2021, the Department processed 112 merit decisions within an average of 46 processing days, which is below the 60 processing days mandated by EEOC. Of those merit decisions, 96% (109) were timely issued within 60 days of receipt of the decision request. The Department also issued 137 final agency actions in cases with an administrative judge's decision (i.e., cases where a hearing was requested); one involved a finding of discrimination in which the agency appealed the finding and remedy.

At the end of FY 2021, the Department had 386 complaints pending. Pending complaints can be at the acknowledgement, investigation, hearing, or final agency decision stages. At the end of FY 2021, 23% of pending complaints were at the investigation stage. Sixty-one percent (61%) were pending a hearing before an EEOC Administrative Judge. A total of 41 (11%) of the complaints remained pending in the final agency decision/action phase with the remaining 19 (5%) pending decision to accept/dismiss.

In FY 2021, the Department's most frequently cited bases for complaints are reprisal, disability (physical), and race (Black), and the most frequently cited issues are harassment (non-sexual), performance evaluation/appraisal, and terms/condition of employment.

In addition, the percentage of Treasury employees who filed formal EEO complaints decreased from 0.33 percent of the workforce in FY 2020 (312 complainants) to 0.29 percent of the workforce in FY 2021 (281 complainants).

#### Alternative Dispute Resolution (ADR)

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

In FY 2021, 92% of EEO counseling contacts were offered ADR, and 55% of those offered ADR participated in ADR at the informal level, a 7% decrease in the ADR participation rate from FY 2020.

Total Completed Counseling	650
Total ADR Offered	600
Total Accepted	328
Offer Rate	92%
Acceptance Rate	55%

#### ADR Offered (Informal) FY 2021

In the formal complaint process, during FY 2021, the Department achieved an 89% ADR offer rate and 16% participation rate, a 5% increase from the FY 2020 ADR participation rate.

FY 2021					
Formal Closed Complaints	398				
Total ADR Offered	354				
Total Accepted	57				
Offer Rate	89%				
Acceptance Rate	16%				

**ADR Offered (Formal)** 

Due to the pandemic, the Department was unable to schedule its annual Dispute Prevention Program (DPW) training.

#### Shared Neutrals Program

For FY 2021, the TSN completed a total of 189 mediations. Of these 189 mediations, TSN mediators successfully resolved 66 (35%) disputes. Also, in FY 2021, the TSN Program re-certified 48 out of 50 of its existing cadre members to serve as mediators until FY 2023 and TSN Administrator functions were transferred to the Office of Civil Rights and Diversity (OCRD).

#### Accomplishments

#### Compliance

- Worked to implement the requirements to ensure compliance with Administration priorities in the following Executive Orders (EOs): 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government; 13950, Combating Race and Sex Stereotyping (until it was revoked in January 2021), 13988, Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation; and 14035, Advancing Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce.
- To further enhance Treasury's commitment to diversity, equity, inclusion, and accessibility, and in response to President Biden's administrative priorities outlined in EOs 13985 and 14035, Treasury hired its first ever Counselor for Racial Equity, who is located within the Office of the Deputy Secretary.
- Through Treasury's Bureau Audit Program, reviewed all phases of DO's EEO programs, including D&I and the EEO complaint processes.
- Assist DASHR-CHCO with the Human Capital Evaluations of the Mint's and IRS's EEO and D&I programs.
- Continued quarterly EEO Directors meetings with the Bureau EEO Officers to discuss EEO emerging issues, best practices, and concerns, and the various EEO programs and activities conducted by the Bureau EEO Offices.
- Improved Treasury's internal and external websites related to EEO programs resulting in clear, accurate, informative, and user-friendly content.

#### Complaints Program

- 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.
- 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 96% timeliness for decisions.
- Oversaw the Department's informal EEO process to timely complete 99% of EEO counselings.
- Contracted with an additional EEO investigative services provider for back up and special circumstance services.
- Ensured TSN mediators met re-certification status to remain active cadre members.

#### Diversity and Inclusion Program

- Distributed Treasury's D&I and EEO Strategic Plan (FY 2021-2024) to Treasury Bureau EEO and D&I Officers
- Maintained a cadre of certified trainers to assist the Department in providing Civil Treatment Training to the workforce.
- Supported special emphasis programs with education and awareness using newsletters, trainings, observances, and activities.
- Supported all five Treasury-wide ERGs through regular meetings, training events, and other outreach opportunities.

- Partnered with Minority Serving Organizations such as Hispanic Association of Colleges and Universities (HACU), Historically Black Colleges and Universities (HBCUs) and Wounded Warrior Project (WWP) that support special emphasis programs nationwide providing advice and guidance for special emphasis program Managers on different subjects.
- Partnered with internal and external stakeholders to coordinate the Treasury-wide virtual job fair that promoted treasury openings to HBCU and Minority Servicing Institution (MSI) students, alumni, and the public. The job fair provided occupational presentations to over 1200 participants.
- Partnered with MSIs to coordinate and develop Federal Institute Partnership Trainings,
- Senior Executive Service Leadership Mentoring Programs, career development events and informational meetings for approximately 5000 federal employees nationwide.

#### Disability Employment Program

- Treasury Veterans Employment Program Office (VEPO) partnered with external and internal stakeholders and attended three virtual job fairs designed for hiring of veterans and persons with disabilities.
- Continued to successfully 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 RAs.
- OCRD, with partners, developed the process to migrate IRS data to the Reasonable Accommodation (RA) tracking system.
- Treasury exceeded EEOC's established goals for PWD (13.86 percent) and PWTD (3.36 percent) in the overall workforce.
- Treasury exceeded EEOC's goal that 12 percent of all new permanent hires be PWD (13.86 percent) and the sub goal that 2 percent of those hires be PWTD (3.36 percent).
- Treasury exceeded EEOC's established goals for PWD (14.69 percent) and PWTD (3.98 percent) in the GS-10 and below grades and in the GS-11 and above grades (12.84 percent/ 2.70 percent).

#### Workforce Demographics/Barrier Analysis

- In FY 2021, each bureau reviewed workforce data and identified one or two mission-critical and/or most populous occupations where female participation rates at the GS-13 and above grade levels consistently falls below the respective availability rate.
- OCRD provided assistance with Treasury's Enterprise Business Solutions (EBS) to prepare the FY 2022 transition from Monster Analytics to USAStaffing for applicant flow data.
- Conducted one-on-one training sessions with new EEO staff and MD-715 preparers on workforce data systems and the Treasury MD-715 reporting structure.

#### **Planned Activities**

#### Compliance

- Continue to implement the requirements to ensure compliance with Administration priorities in the following EOs: 13985, 13950, 13988, and 14035.
- Partner with Bureau EEO Officers to update and issue revised FY 2021-2024 Treasury-wide D&I and EEO Strategic Plan in compliance with EO 14035: Advancing Diversity, Equity, Inclusion and Accessibility in the Federal Workplace.
- Continue the Treasury Bureau Audit Program, reviewing two bureaus in all phases of their EEO programs, including D&I, external civil rights, and EEO complaint process.
- Assist DASHR-CHCO with scheduled Human Capital Evaluations of EEO and D&I programs.
- Continue quarterly EEO Directors meetings with the Bureau EEO Officers to discuss EEO emerging issues, best

practices and concerns, and the various EEO programs and activities conducted by the Bureau EEO offices.

• Continue improvements to Treasury's internal and external websites related to EEO programs resulting in clear, accurate, informative, and user-friendly content.

#### Complaints Program

- 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.
- Improve Treasury ADR participation and settlement rates throughout FY 2022.
- Partner with Treasury bureaus to improve ADR Program marketing strategies and evaluation processes.
- Gradually phase-out the TSN Program and move mediation coordination to each bureau's EEO Program Office.

#### Diversity and Inclusion Program

- Partner with Bureau EEO Officers to establish and implement Treasury's DEIA Strategic Plan pursuant to EO 14035.
- Partner with external and internal stakeholders to help generate diverse and qualified pools of candidates to fill mission-critical occupations; design and conduct targeted activities to promote individuals from all backgrounds, including hosting at least three job fairs designed to improve diversity; and veterans and disability hiring.
- Meet customer training needs by 1) continually sharing bureau requests for training to the Department's Training Cadre, comprised of bureau EEO and Diversity specialists, to facilitate; 2) providing at least one webinar or management alert each quarter to increase awareness; 3) providing on-line training and/or train-the-trainer opportunities on cultural competencies where possible.
- Explore implementing a customer satisfaction survey measuring effectiveness of EEO and D&I programs.
- Publish OCRD Advisory Newsletters to the workforce and 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.

#### Disability Employment Program

- Enhance communications and marketing plans to continually educate managers and employees on Treasury's personal assistance services (PAS) policy and procedures pursuant to the implementation of Treasury-wide PAS contract.
- Continue to 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 hosting at least three job fairs designed to improve diversity, and veterans and disability hiring.
- OCRD will instruct Bureaus to assess their internal and external websites and vacancy announcements to ensure accessibility to individuals with disability, and implement changes where required.
- Celebrate the FY 2022 National Defense Employment Awareness Month (NDEAM)) with a Treasury-wide event, to pay tribute to the accomplishments of the Treasury men and women with disabilities and bring awareness of the challenges persons with disabilities are confronted in the workplace.

#### Workforce Demographics/Barrier Analysis

- Continue to monitor bureau plans to identify the existence of barriers to the employment of any group and strategies to eliminate and barriers that are uncovered.
- Continue to assist EBS with the transition from Monster Analytics to USAStaffing for applicant flow data.

## Part F: Certification of Establishment of Continuing Equal Employment Opportunity Programs

I, Snider Page, Acting Director, Office of Civil Rights and Diversity, 0260, GS-15 , am the

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

Principal EEO Director/Official for

the 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.

Snider Page	Digitally signed by Snider Page Date: 2022.04.15 18:41:10 -04'00'	(
Signature of Dringing EEO	Director/Official	1

04/15/2022

Date

Signature of Principal EEO Director/Official

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

John T. Norris Digitally signed by John T. Norris Date: 2022.04.25 14:21:10 -04'00'

Signature of Agency Head or Agency Head Designee

Date

## PART G: Agency Self-Assessment Checklist

discrimination-free v	vorkplace.		
	A.1 – The agency issues an effective, up-to-date	Measure Met?	Comments
Compliance Indicator	EEO policy statement.	(Yes/No/NA)	
Measures			
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II[A]]	Yes	Issued 9/1/2021 Secretary's EO Policy
A.1.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.
Compliance Indicator	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments
Measures			
A.2.a	Does the agency disseminate the following policies and procedures to all employees:		
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes	
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:		
A.2.b.1	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 annually displays and updates the name and contact information for bureau EEO Officer (Bureau EEO Offices). Bureaus display the specific bureau contact information. At each Treasury bureau, counseling is centralized; therefore, bureaus post general contact information on who to

A.2.b.2	Written materials concerning the EEO program,	Yes	(External)
	laws, policy statements, and the operation of		
	the EEO complaint process? [see 29 C.F.R §		
	1614.102(b)[5]]		OCRD Policies
A.2.b.3	Reasonable accommodation procedures? [see 29	Yes	(External)
	C.F.R. § 1614.203(d)(3)(i)] If so, please provide the		
	internet address in the comments column.		
			OCRD Policies
A.2.c	Does the agency inform its employees about the		
	following topics:		
A.2.c.1	EEO complaint process? [see 29 CFR §§	Yes	It is posted on external (EEO
	1614.102(a)(12) and 1614.102(b)(5)] If "yes",		Complaint Processing) website,
	please provide how often.		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. New
			employees are required to take
			the No FEAR Act training within
			90 days of onboarding.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If "yes",	Yes	It is posted on both the internal
	please provide how often.		(ADR) and external (OCRD Policies)
			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.
A.2.c.3	Reasonable accommodation program? [see	Yes	It is posted on the internal (RA
	29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please		Program) and external websites
	provide how often.		(EEO FAQ) 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. New
			employees are required to take
			the No FEAR Act training within 90
			days of onboarding.
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A.2.c.4	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. 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 posted on both the internal (Anti-Harassment Policy) and external websites (EEO FAQ) and discussed during new employee and manager orientation sessions. Additionally, as part of the No FEAR Act training and annually as part of the Prevention of Sexual Harassment (POSH) training. 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. New employees are required to take the No FEAR Act training within 90
			days of onboarding.
Compliance Indicator	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments
Measures			
A.3.a	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.
A.3.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	
This element require	<b>B: Integration of EEO into the agency's Strat</b> as that the agency's EEO programs are struct upport the agency's strategic mission.	-	n a workplace that is free from
Compliance Indicator Measures	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.	Measure Met? (Yes/No/NA)	Comments
B.1.a	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]]	Νο	OCRD's Director reports to the Assistant Secretary for Management (ASM), who is the EEO Officer for Treasury.

D4 - 4		N	
B.1.a.1	If the EEO Director does not report to the agency	Yes	OCRD's Director reports to the
	head, does the EEO Director report to the same		ASM, who is the EEO Officer for
	agency head designee as the mission-related		Treasury.
	programmatic offices? If "yes," please provide the		
	title of the agency head designee in the comments.		
B.1.a.2	Does the agency's organizational chart clearly	Yes	
	define the reporting structure for the EEO office?		
	[see 29 CFR §1614.102(b)(4)]		
B.1.b	Does the EEO Director have a regular and	Yes	
	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.1.c	During this reporting period, did the EEO Director	Yes	OCRD presented the FY 2020
	present to the head of the agency, and other		State of the Agency (SOA) briefing
	senior management officials, the "State of		to the Agency Head Designee
	the agency" briefing covering the six essential		(ASM) in April 2021 and the
	elements of the model EEO program and the		Secretary and Deputy Secretary of
	status of the barrier analysis process? [see MD-		the Treasury in September 2021.
	715 Instructions, Sec. I)] If "yes", please provide		
	the date of the briefing in the comments column.		
B.1.d	Does the EEO Director regularly participate in	Yes	
	senior-level staff meetings concerning personnel,		
	budget, technology, and other workforce issues?		
	[see MD-715, II(B)]		
	B.2 – The EEO Director controls all aspects of the	Measure Met?	Comments
<b>Compliance Indicator</b>	EEO program.	(Yes/No/NA)	
Measures			
B.2.a	Is the EEO Director responsible for the	Yes	
D.E.U	implementation of a continuing affirmative	100	
	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.2.b	Is the EEO Director responsible for overseeing	Yes	Bureau EEO Officers are responsible
U.E.U	the completion of EEO counseling [see 29 CFR	163	for counseling in connection with
			U U U U U U U U U U U U U U U U U U U
	§1614.102(c)(4)]		their respective bureau EEO
<b>P1 a</b>	lo the EEO Director recording for every sign	Vac	complaints of discrimination.
B.2.c	Is the EEO Director responsible for overseeing	Yes	
	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.2.d	Is the EEO Director responsible for overseeing	Yes	
	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.2.e	Is the EEO Director responsible for ensuring	Yes	
	compliance with EEOC orders? [see 29 CFR §§		
	1614.102(e); 1614.502]		
B.2.f	Is the EEO Director responsible for periodically	Yes	
	evaluating the entire EEO program and providing		
	recommendations for improvement to the agency		
	head? [see 29 CFR §1614.102(c)(2)]		
B.2.g	If the agency has subordinate level components,	Yes	
D.E.9	does the EEO Director provide effective guidance	100	
	and coordination for the components? [see 29		
	CFR §§ 1614.102(c)(2) and (c)(3)]		
		Measure Met?	Commente
	B.3 - The EEO Director and other EEO professional	IVIEasure IVIEt?	Comments
Compliance Indicator	staff are involved in, and consulted on,	(Yes/No/NA)	
	management/personnel actions.		
Measures			
B.3.a	Do EEO program officials participate in agency	Yes	
D.J.d		165	
	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)]		
B.3.b	Does the agency's current strategic plan	Yes	Treasury's Strategic Goal 5.1.C
	reference EEO $ earrow$ diversity and inclusion		Improve diversity and engagement
	principles? [see MD-715, II(B)] If "yes", please		through transparency, fairness,
	identify the EEO principles in the strategic plan in		and inclusion.
	the comments column.		
	B.4 - The agency has sufficient budget and staffing	Measure Met?	Comments
Compliance Indicator	to support the success of its EEO program.		
		(Yes/No/NA)	
Measures			
B.4.a	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.4.a.1	to conduct a self-assessment of the agency for	Yes	
	possible program deficiencies? [see MD-715, II(D)]		
B.4.a.2	to enable the agency to conduct a thorough barrier	Yes	
	analysis of its workforce? [see MD-715, II(B)]		
		1	1

B.4.a.3	to timely, thoroughly, and fairly process	Yes	
D. <del></del> .d.0	EEO complaints, including EEO counseling,	103	
	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)]		
B.4.a.4	to provide all supervisors and employees with	Yes	
D. <del></del> .d. <del></del>	training on the EEO program, including but not	103	
	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		
	comment column.		
B.4.a.5	to conduct thorough, accurate, and effective	Yes	
	field audits of the EEO programs in components		
	and the field offices, if applicable? [see 29 CFR		
	§1614.102(c)(2)]		
B.4.a.6	to publish and distribute EEO materials (e.g.	Yes	
	harassment policies, EEO posters, reasonable		
	accommodations procedures)? [see MD-715, II(B)]		
B.4.a.7	to maintain accurate data collection and tracking	Yes	
	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.		
B.4.a.8	to effectively administer its special emphasis	Yes	
	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]		
B.4.a.9	to effectively manage its anti-harassment	Yes	
	program? [see MD-715 Instructions, Sec. I); EEOC		
	Enforcement Guidance on Vicarious Employer		
	Liability for Unlawful Harassment by Supervisors		
	(1999), § V.C.1]		
B.4.a.10	to effectively manage its reasonable	Yes	
	accommodation program? [see 29 CFR §		
	1614.203(d)(4)(ii)]		
B.4.a.11	to ensure timely and complete compliance with	Yes	
	EEOC orders? [see MD-715, II(E)]		
B.4.b	Does the EEO office have a budget that is separate	Yes	
	from other offices within the agency? [see 29 CFR		
	§ 1614.102(a)[1]]		
	0		

B.4.c	Are the duties and responsibilities of EEO officials	Yes	
	clearly defined? [see MD-110, Ch. 1(III)(A), 2(III),		
	& 6(III)]		
B.4.d	Does the agency ensure that all new counselors and	Yes	
	investigators, including contractors and collateral		
	duty employees, receive the required 32 hours of		
	training, pursuant to Ch. 2(II)(A) of MD-110?		
B.4.e	Does the agency ensure that all experienced	Yes	
	counselors and investigators, including		
	contractors and collateral duty employees, receive		
	the required 8 hours of annual refresher training,		
	pursuant to Ch. 2(II)(C) of MD-110?		
	B.5 – The agency recruits, hires, develops, and	Measure Met?	Comments
Compliance Indicator	retains supervisors and managers who have	(Yes/No/NA)	
	effective managerial, communications, and		
	interpersonal skills.		
Measuress			
B.5.a	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.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Yes	
B.5.a.2	Reasonable Accommodation Procedures? [see 29	Yes	
	C.F.R. § 1614.102(d)(3)]		
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
B.5.a.4	Supervisory, managerial, communication, and	Yes	
	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)]		
B.5.a.5	ADR, with emphasis on the federal government's	Yes	
	interest in encouraging mutual resolution of		
	disputes and the benefits associated with utilizing		
	ADR? [see MD-715(II)(E)]		
	B.6 – The agency involves managers in the	Measure Met?	Comments
Compliance Indicator	implementation of its EEO program.		
		(Yes/No/NA)	
Measures			
B.6.a	Are senior managers involved in the	Yes	
	implementation of Special Emphasis Programs?		
	[see MD-715 Instructions, Sec. I]		
B.6.b	Do senior managers participate in the barrier	Yes	
	analysis process? [see MD-715 Instructions, Sec. I]		

B.6.c	When barriers are identified, do senior managers	Yes	
	assist in developing agency EEO action plans (Part		
	I, Part J, or the Executive Summary)? [see MD-		
	715 Instructions, Sec. I]		
B.6.d	Do senior managers successfully implement EEO	Yes	
	Action Plans and incorporate the EEO Action Plan		
	Objectives into agency strategic plans? [29 CFR §		
	1614.102(a)(5)]		
	: Management and Program Accountability		
	es the agency head to hold all managers, super	rvisors, and EEC	) officials responsible for the
effective implemente	ation of the agency's EEO Program and Plan.	1	
	C.1 – The agency conducts regular internal audits	Measure Met?	Comments
Compliance Indicator	of its component and field offices.	(Yes/No/NA)	
Measures			
С.1.а	Does the agency regularly assess its component	Yes	Annually, and before the submissio
	and field offices for possible EEO program		of the bureau MD-715 reports
	deficiencies? [see 29 CFR §1614.102(c)[2]] If		to EEOC, OCRD evaluates their
	"yes", please provide the schedule for conducting		submissions and provides feedback
	audits in the comments section.		on the status of deficiencies,
			implementation of planned
			activities to mitigate deficiencies,
			and recommends additional
			measures required to mitigate
			noted deficiencies.
			In FY 2021, OCRD conducted an
			audit review of DO's EEO and D&I
			programs. OCRD plans to conduct
			two bureau audits in FY 2022
			and will also participate in Human
			Capital Evaluations scheduled by
			the Treasury DASHR-CHCO.

C.1.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 measures required to mitigate noted deficiencies. In FY 2021, OCRD conducted an audit review of DO's EEO and diversity and inclusion programs. OCRD plans to conduct two bureau audits in FY 2022 and will also participate in Human Capital Evaluations scheduled by the Treasury DASHR-CHCO.
C.1.c	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 a bureau audit, within six months, bureaus are required to submit a compliance report to OCRD.
Compliance Indicator	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
Measures C.2.a	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	
	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	Yes	

С.2.а.З	Does the agency have a separate procedure (outside the EEO complaint process) to address	Yes	
	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)]		
C.2.a.4	Does the agency ensure that the EEO office	Yes	
	informs the anti-harassment program of all EEO		
	counseling activity alleging harassment? [see		
	Enforcement Guidance, V.C.]		
C.2.a.5	Does the agency conduct a prompt inquiry	Yes	
	(beginning within 10 days of notification) of all		
	harassment allegations, including those initially		
	raised in the EEO complaint process? [see		
	Complainant v. Dep't of Veterans Affairs, EEOC		
	Appeal No. 0120123232 (May 21, 2015);		
	Complainant v. Dep't of Defense (Defense		
	Commissary Agency), EEOC Appeal No.		
	0120130331 (May 29, 2015)] If "no", please		
	provide the percentage of timely-processed inquiries in the comments column.		
C.2.a.6	Do the agency's training materials on its anti-	Yes	
0.2.d.U	harassment policy include examples of disability-	165	
	based harassment? [see 29 CFR 1614.203(d)[2]]		
C.2.b	Has the agency established disability reasonable	Yes	Treasury's RA Policy and
	accommodation procedures that comply with		Procedures was approved by the
	EEOC's regulations and guidance? [see 29 CFR		EEOC on February 3, 2021.
	1614.203(d)(3)]		At the end of FY 2021, all
			Treasury bureau Reasonable
			Accommodation Policies have been
			updated, reviewed, and approved by
			OCRD. The Policies were submitted
			to, and approved by, EEOC.
C.2.b.1	Is there a designated agency official or	Yes	
	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)]		
C.2.b.2	Has the agency established a firewall between the	Yes	
	Reasonable Accommodation Program Manager		
	and the EEO Director? [see MD-110, Ch. 1(IV)(A)]		
C.2.b.3	Does the agency ensure that job applicants can	Yes	
	request and receive reasonable accommodations		
	during the application and placement processes?		
	[see 29 CFR 1614.203(d)(1)(ii)(B)]		

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C.2.b.4	Do the reasonable accommodation procedures	Yes	
	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)]		
C.2.b.5	Does the agency process all accommodation	No	IRS reported that it timely
	requests within the time frame set forth in		processed 31% of its requests. IRS
	its reasonable accommodation procedures?		has prepared a Part H in their MD-
	[see MD-715, II(C)] If "no", please provide the		715 report that directly addresses
	percentage of timely-processed requests in the		this matter.
	comments column.		
C.2.c	Has the agency established procedures for	Yes	
	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)]		
C.2.c.1	Does the agency post its procedures for	Yes	https://home.treasury.gov/about/
	processing requests for Personal Assistance		offices/management/civil-rights-
	Services on its public website? [see 29 CFR §		and-diversity/eeo-and-civil-rights-
			policies
	1614.203(d)(5)(v)] If "yes", please provide the		
	internet address in the comments column.		
	internet address in the comments column.	Moocuro Mot?	Commonte
	internet address in the comments column. C.3 - The agency evaluates managers and	Measure Met?	Comments
Compliance Indicator	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal	Measure Met? (Yes/No/NA)	Comments
Compliance Indicator	internet address in the comments column. C.3 - The agency evaluates managers and		Comments
Compliance Indicator Measures	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal		Comments
•	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal		Comments
Measures	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. Pursuant to 29 CFR §1614.102(a)(5), do all	[Yes/No/NA]	Comments
Measures	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in	[Yes/No/NA]	Comments
Measures	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their	[Yes/No/NA]	Comments
Measures	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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	[Yes/No/NA]	Comments
C.3.a	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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/No/NA]	Comments
Measures	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate	[Yes/No/NA]	Comments
C.3.a	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors	[Yes/No/NA]	Comments
C.3.b	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:	[Yes/No/NA] Yes	Comments
C.3.a	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/disagreements/conflicts,	[Yes/No/NA]	Comments
C.3.b	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings?	[Yes/No/NA] Yes	Comments
Measures         C.3.a         C.3.b         C.3.b.1	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.]	[Yes/No/NA] Yes	Comments
C.3.b	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.1] Ensure full cooperation of employees under	[Yes/No/NA] Yes	Comments
Measures         C.3.a         C.3.b         C.3.b.1	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.1] Ensure full cooperation of employees under his/her supervision with EEO officials, such as	[Yes/No/NA] Yes	Comments
Measures         C.3.a         C.3.b         C.3.b.1	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/ disagreements/ conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.1] Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR	[Yes/No/NA] Yes	Comments
Measures         C.3.a         C.3.b.1         C.3.b.2	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I] 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/No/NA] Yes Yes Yes	Comments
Measures         C.3.a         C.3.b         C.3.b.1	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I] Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)[6]] Ensure a workplace that is free from all forms	[Yes/No/NA] Yes	Comments
Measures         C.3.a         C.3.b.1         C.3.b.2	internet address in the comments column. C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. 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? Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I] 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/No/NA] Yes Yes Yes	Comments

C.3.b.4	Ensure that subordinate supervisors have effective	Yes	
0.0.0.4	managerial, communication, and interpersonal	165	
	skills to supervise in a workplace with diverse		
0.0 1 5	employees? [see MD-715 Instructions, Sec. I]	N	
C.3.b.5	Provide religious accommodations when such	Yes	
	accommodations do not cause an undue		
	hardship? [see 29 CFR §1614.102(a)[7]]		
C.3.b.6	Provide disability accommodations when such	Yes	
	accommodations do not cause an undue		
	hardship? [ see 29 CFR §1614.102(a)(8)]		
C.3.b.7	Support the EEO program in identifying and	Yes	
	removing barriers to equal opportunity. [see MD-		
	715, II(C)]		
C.3.b.8	Support the anti-harassment program in	Yes	
	investigating and correcting harassing conduct.		
	[see Enforcement Guidance, V.C.2]		
C.3.b.9	Comply with settlement agreements and orders	Yes	
	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)]		
C.3.c	Does the EEO Director recommend to the agency	Yes	
	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)]		
C.3.d	When the EEO Director recommends remedial	Yes	
	or disciplinary actions, are the recommendations		
	regularly implemented by the agency? [see 29		
	CFR §1614.102[c][2]]		
	C.4 – The agency ensures effective coordination	Measure Met?	Comments
	between its EEO programs and Human Resources		
Compliance Indicator	(HR) program.	(Yes/No/NA)	
Measures			
	Do the HR Director and the EEO Director meet	Yes	
0.4 -	regularly to assess whether personnel programs,		
C.4.a	policies, and procedures conform to EEOC laws,		
	instructions, and management directives? [see 29		
	CFR §1614.102(a)[2]]		

C.4.b	Has the agency established timetables/schedules	Yes	
	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]		
C.4.c	Does the EEO office have timely access to	Yes	
	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)]		
C.4.d	Does the HR office timely provide the EEO office	Yes	
	with access to other data (e.g., exit interview data,		
	climate assessment surveys, and grievance data),		
	upon request? [see MD-715, II(C)]		
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO	Yes	
	office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for	Yes	
	Individuals with Disabilities? [see 29 CFR		
	§1614.203(d); MD-715, II(C)]		
C.4.e.2	Develop and/or conduct outreach and recruiting	Yes	
	initiatives? [see MD-715, II(C)]		
C.4.e.3	Develop and/or provide training for managers and	Yes	
	employees? [see MD-715, II(C)]		
C.4.e.4	Identify and remove barriers to equal opportunity	Yes	
	in the workplace? [see MD-715, II(C)]		
C.4.e.5	Assist in preparing the MD-715 report? [see MD-	Yes	
	715, II[C]]		
	C.5 – Following a finding of discrimination,	Measure Met?	Comments
Compliance Indicator	the agency explores whether it should take a	(Yes/No/NA)	
	disciplinary action.	(,	
•			
Measures	Desette energy bays a dissipling washing and (		
С.5.а	Does the agency have a disciplinary policy and/	Yes	
	or table of penalties that covers discriminatory		
	conduct? [see 29 CFR § 1614.102(a)(6); see		
	also Douglas v. Veterans Administration, 5 MSPR		
CEL	280 (1981)]	Vac	
C.5.b	When appropriate, does the agency discipline	Yes	Managers/employees associated
	or sanction managers and employees		with the two administrative
	for discriminatory conduct? [see 29 CFR		EEO cases where the agency
	§1614.102(a)(6)) If "yes", please state the		found discrimination were
	number of disciplined/sanctioned individuals during this reporting period in the comments.		disciplined/sanctioned.

C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors	Yes	
	about the discriminatory conduct? [see MD-715, II(C)]		
	C.6 – The EEO office advises managers/	Measure Met?	Comments
Compliance Indicator	supervisors on EEO matters.	(Yes/No/NA)	
▼ Measures			
C.6.a	Does the EEO office provide management/	Yes	The OCRD Director updates the
0.0.0	supervisory officials with regular EEO updates on	100	ASM as issues arise. The OCRD
	at least an annual basis, including EEO complaints,		Director also participates in
	workforce demographics and data summaries,		the ASM's bi-weekly senior staff
	legal updates, barrier analysis plans, and special		meetings. Additionally, the ASM
	emphasis updates? [see MD-715 Instructions,		has direct access to Diversity
	Sec. I] If "yes", please identify the frequency of the		Dashboards to view workforce
	EEO updates in the comments column.		demographics as needed.
C.6.b	Are EEO officials readily available to answer	Yes	
	managers' and supervisors' questions or		
	concerns? [see MD-715 Instructions, Sec. I]		
This element require	<b>): Proactive Prevention</b> es that the agency head make early efforts to	prevent discrim	ination and to identify and
This element require	): Proactive Prevention	prevent discrim	ination and to identify and Comments
This element require eliminate barriers to	<b>D: Proactive Prevention</b> es that the agency head make early efforts to equal employment opportunity.	Measure Met?	-
This element require	D: Proactive Prevention es that the agency head make early efforts to p equal employment opportunity. D.1 – The agency conducts a reasonable		-
This element require eliminate barriers to Compliance Indicator	D: Proactive Prevention es that the agency head make early efforts to be equal employment opportunity. D.1 – The agency conducts a reasonable assessment to monitor progress towards	Measure Met?	-
This element require eliminate barriers to Compliance Indicator Measures	D: Proactive Prevention es that the agency head make early efforts to be equal employment opportunity. D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	-
This element require eliminate barriers to Compliance Indicator Measures	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying	Measure Met?	-
This element require eliminate barriers to Compliance Indicator Measures	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715	Measure Met? (Yes/No/NA)	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         b equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]	Measure Met? (Yes/No/NA)	-
This element require eliminate barriers to Compliance Indicator	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         Does the agency regularly use the following	Measure Met? (Yes/No/NA)	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         b equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         Does the agency regularly use the following	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         Does the agency regularly use the following         sources of information for trigger identification:	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         Does the agency regularly use the following         sources of information for trigger identification:         workforce data; complaint/grievance data; exit	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         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;	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         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	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         pequal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         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	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         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	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         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	Measure Met? (Yes/No/NA) Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a	D: Proactive Prevention         es that the agency head make early efforts to         pequal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         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]	Measure Met? (Yes/No/NA) Yes Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a D.1.b	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         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]         Does the agency conduct exit interviews or         surveys that include questions on how the agency	Measure Met? (Yes/No/NA) Yes Yes	-
This element require eliminate barriers to Compliance Indicator Measures D.1.a D.1.b	D: Proactive Prevention         es that the agency head make early efforts to         p equal employment opportunity.         D.1 – The agency conducts a reasonable         assessment to monitor progress towards         achieving equal employment opportunity         throughout the year.         Does the agency have a process for identifying         triggers in the workplace? [see MD-715         Instructions, Sec. I]         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]         Does the agency conduct exit interviews or	Measure Met? (Yes/No/NA) Yes Yes	-

	D.2 – The agency identifies areas where barriers	Measure Met?	Comments
Compliance Indicator	may exclude EEO groups (reasonable basis to act.)	(Yes/No/NA)	
Measures			
D.2.a	Does the agency have a process for analyzing the	Yes	
	identified triggers to find possible barriers? [see		
	MD-715, (II)(B)]		
D.2.b	Does the agency regularly examine the impact	Yes	
	of management/personnel policies, procedures,		
	and practices by race, national origin, sex, and		
	disability? [see 29 CFR §1614.102(a)(3)]		
D.2.c	Does the agency consider whether any group	Yes	
	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)]		
D.2.d	Does the agency regularly review the following	Yes	Complaint data through
	sources of information to find barriers: complaint,/		iComplaints and workforce data
	grievance data, exit surveys, employee climate		and exit survey data through Data
	surveys, focus groups, affinity groups, union,		Insight and Monster Analytics.
	program evaluations, anti-harassment program,		Information regarding Unions,
	special emphasis programs, reasonable		reasonable accommodations, anti-
	accommodation program; anti-harassment		harassment, as well as any other
	program; and/or external special interest groups?		required information is provided by
	[see MD-715 Instructions, Sec. I] If "yes", please		the bureaus' EEO and HR personn
	identify the data sources in the comments column.		upon request.
	D.3 – The agency establishes appropriate action	Measure Met?	Comments
Compliance Indicator	plans to remove identified barriers.	[Yes/No/NA]	
Measures			
D.3.a.	Does the agency effectively tailor action plans	Yes	
	to address the identified barriers, in particular		
	policies, procedures, or practices? [see 29 CFR		
	§1614.102(a)(3)]		
D.3.b	If the agency identified one or more barriers during	Yes	
	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)]		
D.3.c	Does the agency periodically review the	Yes	
-	effectiveness of the plans? [see MD-715, II(D)]		

	D.4 – The agency has an affirmative action plan	Measure Met?	Comments
Compliance Indicator	for people with disabilities, including those with targeted disabilities.	(Yes/No/NA)	
Measures			
D.4.a	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	https://home.treasury.gov/about/ offices/management/civil-rights- and-diversity
D.4.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	
D.4.c	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	
D.4.d	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	
	<b>Efficiency</b> as the agency head to ensure that there are e agency's EEO programs and an efficient and f E.1 - The agency maintains an efficient, fair, and		- ·
Compliance Indicator	impartial complaint resolution process.	(Yes/No/NA)	
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	In FY 21, 99% of EEO counselings were timely.
E.1.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	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes	

E.1.d	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(I)? 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 2021 Averages: Acceptance letters were issued on average in 19.7 days; and Dismissal letters were issued on average in 20.1 days.
E.1.e	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	
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes	In FY 21, 94% of investigations were timely.
E.1.g	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	Correspondence is issued to complainant.
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes	In FY 21, 96% were timely.
E.1.i	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	In FY 21, 97% were timely.
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)[A]] If "yes", please describe how in the comments column.	Yes	OCRD contracts with the United States Postal Service to conduct its EEO investigations. We also have a contract with Martin Miser to serve as our backup for EEO investigations. OCRD meets with the EEO Investigators of each complaint frequently to discuss issues or concerns and ensure timeliness of the investigation. OCRD also conducts bi-weekly meetings to review the 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.

agency hold them accountable for poor work product and/or delays during performance review? [See MD.110, Ch. 5[V][A])       Yes         E.1.1       Does the agency submit complaint files and other documents in the proper format to EEO through the Federal Sector EEO Portal [FedSEP]? [See 29]       Yes         Compliance Indicator       E.2 - The agency has a neutral EEO process.       Measures Met? (Yes/No/NA)       Comments         E.2.a       Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD.110, Ch. 1[M][D])       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Complaint Departments         E.2.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[M][D])       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Complaint Departions. If outside councels needed, we engage the Office of General Counsel, ensuring a frewall betwee any representative? [see MD.110, Ch. 1[M][D])         E.2.c       If the EEO office relies on the agency review, in the comments column.       Yes         E.2.c       If the EEO office relies on the agency review and the agency representative? [see MD.110, Ch. 1[M][D])       Yes         E.2.d       Does the agency ensure that is agency representative? [see MD.110, Ch. 1[M][D])       Yes         E.2.d       If ensuel between the reviewing atzomey and the agency representative? [see EEO Report, Attaining a Model Agency Program: Efficien	E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the	Yes	
documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP? [See 29 CFR § 1614.403(g)]       Comments         Compliance Indicator       E.2 - The agency has a neutral EEO process.       Measure Met?       Comments         Measures       Has the agency established a clear separation between its EEO compliant program and its defensive function? [see MD-110, Ch. 1[W][D]]       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Compliant Operations of the autore who conducts the legal sufficiency review, does the EEO office have access to provide "yes", please identify the source/location of the attormey who conducts the legal sufficiency review, in the comments column.       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Complaint Operations. If outside coursel is needed, we angage the Office office are any representative! [see MD-110, Ch. 1[W][D]] if "yes", please identify the source/location of the attormey who conducts the legal sufficiency review, in the comments column.       Yes         E.2.c       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[W][D]]       Yes         E.2.d       Does the agency encreasing time frames incorporated for the legal compliants? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal compliants? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]       Yes       Comments<		product and/or delays during performance		
Compliance Indicator       E.2 - The agency has a neutral EED process.       Measure Met?       Comments         Measures       E.2.a       Has the agency established a clear separation between its EED complaint program and its defensive function? [see MD-110, Ch. 1[IV][D]]       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Complaint Operations, If outside counsel is needed, we engage the Clifice of General Counsel is needed, we engage the Clifice of General Counsel is needed, we engage the Clifice of General Counsel is needed, we engage the Clifice of General Counsel is needed, we engage the Clifice of General Counsel is needed, we engage the Clifice of General Counsel is needed, we engage the Clifice of General Counsel is needed, we engage the Clifice of General Counsel is needed. We engage the Clifice of General Counsel is needet the selese of the legal sufficiency review, is ther	E.1.I	documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29	Yes	
Compliance Indicator       [Yes/No/NA]         Measures       [Yes/No/NA]         E2.a       Has the agency established a clear separation between its EED complaint program and its defensive function? [see MD-110, Ch. 1[IV][D]]       Yes         E2.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 attrime who conducts the legal sufficiency review in the comments column.       Yes       Legal sufficiency review and conducts the legal sufficiency review in the agency's defensive function to conduct the legal sufficiency review, is there a finewall between the reviewing attrime and the agency representative? [see MD-110, Ch. 1[V][D]]       Yes         E2.c       If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a finewall between the reviewing attrime and the agency representative? [see MD-110, Ch. 1[V][D]]       Yes         E2.d       Does the agency ensure that its agency representative? [see MD-110, Ch. 1[V][D]]       Yes         E2.d       Does the agency ensure that its agency representative? [see MD-110, Ch. 1[V][D]]       Yes         E2.e       If applicable, are processing time frames incorporated for the legal sufficiency review, is there a finewall between the reviewing attormes incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency [see MD-110, Ch. 1[V][D]]       Yes         E2.e				
Compliance Indicator       (Yes/Ng/NA)         Measures       Has the agency established a clear separation between its EED complaint program and its defensive function? [see MD-110, Ch. 1[IV][D]]       Yes         E.2.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 conducted internally by the Asst. Director for Complaint Operations. If outside counsels is needed, we my representative? [see MD-110, Ch. 1[IV][D]] if "yes", please identify the source/location of the attorney who conducts the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1[V][D]]       Yes         E.2.c       If the EEO office relies on the agency's defensive year of the agency representative? [see MD-110, Ch. 1[V][D]]       Yes         E.2.d       Does the agency ensure that its agency representative? [see MD-110, Ch. 1[V][D]]       Yes         E.2.d       Does the agency ensure that its agency representative? (see MD-110, Ch. 1[V][D]]       Yes         E.2.d       Does the agency ensure that its agency representative does not intrude upon EED counseling, investigations, and final agency review for timely processing of complaints? [see EEO CReport, Attaining a Model Agency Program: Efficiency review for timely processing of complaints? [see EEO CReport, Attaining a Model Agency Program: Efficiency review for timely processing of complaints? [see EEO CReport, Atta		E.2 – The agency has a neutral EEO process.	Measure Met?	Comments
Measures       Least Name       Compliance         E2.a       Has the agency established a clear separation between its EED compliant program and its defensive function? [see MD-110, Ch. 1[(V][D)]       Yes       Legal sufficiency reviews, does the EED office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1[(V][D)] If 'yee', please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.       Yes       Legal sufficiency reviews, if outside coursel is needed, we engage the Office of General Coursel, ensuring a firewall betwee any representative? [see MD-110, Ch. attorney who conducts the legal sufficiency review, in the comments column.       Yes         E2.c       If the EED 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         E2.d       Does the agency ensure that its agency representative does not intrude upon EED counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV][D]]       Yes         E2.e       If applicable, are processing time frames incorporated for the legal coursel's sufficiency review for timely processing of complaints? [see EECC Report, Attaining a Model Agency Program: Efficiency [Dec. 1, 2004]]       Yes         E3 - The agency has established and encouraged the widespread use of a fair atternative dispute       Measure Met? Yes/No/NAI       Comments	Compliance Indicator			
E.2.a       Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1[[V][D]]       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Complaint Dyperations. If outside counsel is needed, we engage the Office of General attorney who conducts the legal sufficiency review, is there a finewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1[[V][D]]       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Complaint Operations. If outside counsel is needed, we engage the Office of General counsel, ensuring a firewall betwee any representational activities and providing advice to OCPD.         E.2.c       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[[V][D]]       Yes         E.2.d       Does the agency unsure that its agency representative? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.d       Does the agency ensure that its agency representative agency representative? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.d       Does the agency ensure that its agency representative? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review, is there a finewall betwee and reviewing attribute upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the l			(Yes/No/NAJ	
E.2.a       Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1[[V][D]]       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Complaint Dyperations. If outside counsel is needed, we engage the Office of General attorney who conducts the legal sufficiency review, is there a finewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1[[V][D]]       Yes       Legal sufficiency reviews are conducted internally by the Asst. Director for Complaint Operations. If outside counsel is needed, we engage the Office of General counsel, ensuring a firewall betwee any representational activities and providing advice to OCPD.         E.2.c       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[[V][D]]       Yes         E.2.d       Does the agency unsure that its agency representative? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.d       Does the agency ensure that its agency representative agency representative? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.d       Does the agency ensure that its agency representative? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review, is there a finewall betwee and reviewing attribute upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the l				
E2.b       between its EED complaint program and its defensive function? [see MD-110, Ch. 1[IV][D]]       Yes       Legal sufficiency reviews are conducted internally by the Asst.         E2.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.       If outside counsel is needed, we engage the Office of General Counsel, ensuring a firewall betwee any representational activities and providing advice to OCRD.         E.2.c       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[(V)[D]]       Yes         E.2.d       Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1[(V)[D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]       Yes         E3- The agency has established and encouraged the widespread use of a fair alternative dispute the widespread use of a fair alternative dispute       Measure Met? Yes/No/NA)       Comments			Vaa	
defensive function? [see MD-110, Ch. 1[[V][D]]         Image: Constraint of the second se	E.2.a		Yes	
E.2.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 conducted internally by the Asst. Director for Complaint Operations. If outside counsel is needed, we engage the Office of General Counsel, ensuring a firewall betwee any representational activities and providing advice to OCRD.         E.2.c       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         E.2.d       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         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review; see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004]]       Yes         Compliance Indicator       E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute       Measure Met?       Comments				
does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1[V][D]] If "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.       Director for Complaint Operations. If outside counsel is needed, we engage the Office of General Counsel, ensuring a firewall betwee any representational activities and providing advice to OCRD.         E.2.c       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[(V][D]]       Yes         E.2.d       Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1[(V][D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004]]       Yes         E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute the widespread use of a fair alternative dispute       Measure Met? (Comments       Comments	EOb		Vac	
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representative? [see MD-110, Ch. 1[[V][D]] If       "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.       If outside counsel is needed, we engage the Office of General Counsel, ensuring a firewall betwee any representational activities and providing advice to OCRD.         E.2.c       If the EED 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[(V)[D]]       Yes         E.2.d       Does the agency ensure that its agency representative? [see MD-110, Ch. 1[(V)[D]]       Yes         E.2.d       Does the agency ensure that its agency decisions? [see MD-110, Ch. 1[(V)[D]]       Yes         E.2.d       Does the agency ensure that its agency representative? [see MD-110, Ch. 1[(V)[D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]       Yes         Compliance Indicator       E.3- The agency has established and encouraged the widespread use of a fair alternative dispute       Measure Met? Comments       Comments				
"yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.       engage the Office of General Counsel, ensuring a firewall betwee any representational activities and providing advice to OCRD.         E.2.c       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         E.2.d       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         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency [Dec. 1, 2004]]       Yes         E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute       Measure Met?? [Yes/No/NA]				
attorney who conducts the legal sufficiency review in the comments column.       Counsel, ensuring a firewall between any representational activities and providing advice to OCRD.         E.2.c       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(IVJ[D])       Yes         E.2.d       Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IVJ[D])       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]       Yes         E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute the widespread use of a fair alternative dispute       Measure Me? Yes/No/Na)       Comments				
in the comments column.       any representational activities and providing advice to OCRD.         E.2.c       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         E.2.d       Does the agency ensure that its agency representative? [see MD-110, Ch. 1(IV)[D]]       Yes         E.2.d       Does the agency ensure that its agency error exiew, is incorporated does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)[D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004]]       Yes         E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute       Measure Met? [Comments				
Image: state stat				-
E.2.c       If the EED 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[I/V][D]]       Yes         E.2.d       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         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency [Dec. 1, 2004]]       Yes         E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute       Measure Met?       Comments				
function to conduct the legal sufficiency review, is       indexe a firewall between the reviewing attorney       indexe a firewall between the reviewing attorney         and the agency representative? [see MD-110, Ch.       in(V)[D]       in(V)[D]         E.2.d       Does the agency ensure that its agency       Yes         representative does not intrude upon EEO       incomseling, investigations, and final agency       incomseling, investigations, and final agency         decisions? [see MD-110, Ch. 1(V)[D]]       incorporated for the legal counsel's sufficiency       Yes         F.2.e       If applicable, are processing time frames       Yes         incorporated for the legal counsel's sufficiency       incorporated for the legal counsel's sufficiency       incorporated for the legal counsel's sufficiency         review for timely processing of complaints? [see       EEOC Report, Attaining a Model Agency Program:       incomplainte indoce and incomplaints? [see         EEOC Report, Attaining a Model Agency Program:       EEOC Report, Attaining a Model Agency Program:       incomplainte indoce and incomplaints? [see         EEOC Report, Attaining a Model Agency Program:       EEOC Report, Attaining a Model Agency Program:       incomplainte indoce and incomplaints?         the widespread use of a fair alternative dispute       Yes/No/NAj       incomplaints	E.2.c	If the EEO office relies on the agency's defensive	Yes	
there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1[[V][D]]       Image: Compliance Indicator         E.2.d       Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1[[V][D]]       Yes         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency [Dec. 1, 2004]]       Yes         the widespread use of a fair alternative dispute       Measure Met?       Comments				
1(IV)[D)]       Image: Constraint of the second of the secon				
E.2.d       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         E.2.e       If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency [Dec. 1, 2004]]       Yes         E.2.e       E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute       Measure Met? (Yes/No/NA)		and the agency representative? [see MD-110, Ch.		
representative does not intrude upon EEO       representative does not intrude upon EEO         counseling, investigations, and final agency       representative does not intrude upon EEO         decisions? [see MD-110, Ch. 1[V][D]]       representative does not intrude upon EEO         E.2.e       If applicable, are processing time frames         incorporated for the legal counsel's sufficiency       Yes         review for timely processing of complaints? [see         EEOC Report, Attaining a Model Agency Program:         Efficiency (Dec. 1, 2004)]         E.3 - The agency has established and encouraged         the widespread use of a fair alternative dispute         (Yes/No/NA)		1(IV)[D)]		
counseling, investigations, and final agency       adecisions? [see MD-110, Ch. 1[V](D])       adecisions?       adecisions?         E.2.e       If applicable, are processing time frames       Yes       adecisions?         incorporated for the legal counsel's sufficiency       review for timely processing of complaints? [see       adecisions?         EEOC Report, Attaining a Model Agency Program:       EEOC Report, Attaining a Model Agency Program:       addcomplaints?         Efficiency (Dec. 1, 2004)]       addcomplaints?       addcomplaints?         Finance Indicator       E3-The agency has established and encouraged       Measure Met?         Complaince Indicator       the widespread use of a fair alternative dispute       [Yes/No/NA]	E.2.d	Does the agency ensure that its agency	Yes	
decisions? [see MD-110, Ch. 1(IV)[D]]       Image: Complexity of the set of the s		representative does not intrude upon EEO		
E.2.e If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)] E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute the widespread use of a fair alternative dispute (Yes/No/NA)		counseling, investigations, and final agency		
incorporated for the legal counsel's sufficiency       incorporated for the legal counsel's sufficiency         review for timely processing of complaints? [see       incorporated for the legal counsel's sufficiency         EEOC Report, Attaining a Model Agency Program:       incorporated for the legal counsel's sufficiency         EEOC Report, Attaining a Model Agency Program:       incorporated for the legal counsel's sufficiency         EEOC Report, Attaining a Model Agency Program:       incorporated for the legal counsel's sufficiency         Efficiency (Dec. 1, 2004)]       incorporated for the legal counsel's sufficiency         E.3 - The agency has established and encouraged       Measure Met?         Comments       the widespread use of a fair alternative dispute		decisions? [see MD-110, Ch. 1(IV)(D)]		
review for timely processing of complaints? [see       Image: See Sector S	E.2.e	If applicable, are processing time frames	Yes	
EEOC Report, Attaining a Model Agency Program:       EEOC Report, Attaining a Model Agency Program:         Efficiency (Dec. 1, 2004)]       EEOC Report, Attaining a Model Agency Program:         E.3 - The agency has established and encouraged       Measure Met?         Compliance Indicator       the widespread use of a fair alternative dispute		incorporated for the legal counsel's sufficiency		
Efficiency [Dec. 1, 2004]]     Efficiency [Dec. 1, 2004]]       E     E     E       E     E     E       Image: the widespread use of a fair alternative dispute     Measure Met?       Compliance Indicator     (Yes/No/NA)				
E.3 - The agency has established and encouraged       Measure Met?       Comments         Compliance Indicator       the widespread use of a fair alternative dispute       (Yes/No/NA)				
Compliance Indicator the widespread use of a fair alternative dispute [Yes/No/NA]		Efficiency (Dec. 1, 2004)]		
Compliance Indicator the widespread use of a fair alternative dispute (Yes/No/NA)				
			Measure Met?	Comments
resolution (AUH) program.	Compliance Indicator		(Yes/No/NA)	
		resolution (ADR) program.		
Measures	Measures			

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

E.4.b	Does the agency have a system in place to re- survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
Compliance Indicator	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? [Yes/No/NA]	Comments
E.5.a	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	Analysis tools include: 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.
E.5.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 unpaid internship programs to establish a pipeline of diverse candidates for future employment; and Veteran resume data base.
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	
	E Responsiveness and Legal Compliance es federal agencies to comply with EEO statute ctions. F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	es and EEOC re Measure Met? (Yes/No/NA)	gulations, policy guidance, and Comments
F.1.a	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	
F.1.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	

F.1.c		Vee	
F.1.C	Are there procedures in place to ensure the timely	Yes	
	and predictable processing of ordered monetary		
	relief? [see MD-715, II(F)]	No -	
F.1.d	Are procedures in place to process other forms of	Yes	
<b>F</b> 4 -	ordered relief promptly? [see MD-715, II(F)]	N/	
F.1.e	When EEOC issues an order requiring compliance	Yes	
	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)]		
	F.2 – The agency complies with the law, including	Measure Met?	Comments
Compliance Indicator	EEOC regulations, management directives, orders,	(Yes/No/NA)	
	and other written instructions.		
Measures			
F.2.a	Does the agency timely respond and fully comply	Yes	
1.2.0	with EEOC orders? [see 29 CFR §1614.502;	100	
	MD-715, II(E)]		
F.2.a.1	When a complainant requests a hearing, does the	Yes	
1.2.0.1	agency timely forward the investigative file to the	100	
	appropriate EEOC hearing office? [see 29 CFR		
	§1614.108(g)]		
F.2.a.2	When there is a finding of discrimination that is	Yes	
1.2.0.2	not the subject of an appeal by the agency, does	100	
	the agency ensure timely compliance with the		
	orders of relief? [see 29 CFR §1614.501]		
F.2.a.3	When a complainant files an appeal, does the	Yes	
1.2.0.0	agency timely forward the investigative file to	100	
	EEOC's Office of Federal Operations? [see 29 CFR		
	§1614.403[e]]		
F.2.a.4	Pursuant to 29 CFR §1614.502, does the	Yes	
	agency promptly provide EEOC with the required		
	documentation for completing compliance?		
	F.3 - The agency reports to EEOC its program	Measure Met?	Comments
	efforts and accomplishments.		
Compliance Indicator		(Yes/No/NA)	
Measures			
F.3.a	Does the agency timely submit to EEOC an	Yes	
	accurate and complete No FEAR Act report?		
	[Public Law 107-174 (May 15, 2002), §203(a)]		
F.3.b	Does the agency timely post on its public webpage	Yes	Public webpage: <u>https://home.</u>
	its quarterly No FEAR Act data? [see 29 CFR		treasury.gov/footer/no-fear-act
	§1614.703(d)]		
L	- • ••	I	1

# 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	Has the agency established disability reasonable accommodation procedures that comply
	with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]
	As part of EEOC's feedback on Treasury and its bureaus FY 2017 affirmative action plans,
	EEOC identified that Treasury and some of its bureaus RA policies and procedures had not
	been reviewed and approved based on changes required by the updated 29 CFR 1614.203.

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

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

### **Responsible Official(s)**

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

Target Date	Planned Activities	Sufficient Funding	Modified Date	Completion
(mm/dd/yyyy)		& Staffing?	(mm/dd/yyyy)	Date
		(Yes or No)		(mm/dd/yyyy)
08/30/2018	Require bureaus to submit updated RA policies and	Yes		08/24/2018
	procedures to OCRD for review and comment.			
09/07/2018	OCRD will review bureau RA policies and procedures	Yes		09/07/2018
	and make any recommended changes. Those RA			
	policies and procedures requiring change will be			
	returned to the appropriate bureau for corrections.			
01/30/2018	Once bureau RA policies and procedures are	Yes		01/30/2018
	approved by OCRD, they will be submitted to EEOC			
	for review and final approval.			

03/30/2018	Pending EEOC's final approval of bureau RA policies	Yes	09/30/2020	
	and procedures, Bureaus will post interim RA policies			
	and procedures to internal and external websites.			
03/30/2019	Once RA policies and procedures are approved by	Yes	09/30/2020	
	EEOC, bureaus post their EEOC approved RA policies			
	and procedure to their internal			
	and external.			

Fiscal Year	Accomplishments
2018	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.
2019	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.
2020	OCRD met with EEOC regarding the RA Policy and Procedures status. OCRD submitted to EEOC the remaining
	RAPs for final review and approval. The EEOC's review was finalized at the end of FY 2020 resulting in a request for
	changes. OCRD received final approval from EEOC in FY 2021.
2021	Treasury's RA Policy and Procedures was approved by the EEOC on February 3, 2021. Treasury's approved policy
	will be entered into Treasury's Official Directives and Departmental Offices Systems (TODDS) assignment database
	for regular monitoring and updates.
	At the end of FY 2021, all Treasury bureau Reasonable Accommodation Policies have been updated, reviewed, and
	approved by OCRD. The Policies were submitted to, and approved by, EEOC.
	This deficiency is CLOSED.

# Part H: Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

### Statement of Model Program Essential Element Deficiency

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

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

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

### **Responsible Official(s)**

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

Target Date	Planned Activities	Sufficient Funding	Modified Date	Completion
(mm/dd/yyyy)		& Staffing?	(mm/dd/yyyy)	Date (mm/dd/
		(Yes or No)		уууу)
9/30/2019	Monitor implementation of IRS's planned activities to	Yes	9/30/2020	
	eliminate untimely processing of RA requests.			
04/30/2019	Allocate budget for Treasury-wide RA tracking	Yes		04/04/2019
	system.			
09/30/2019	Initiate procurement process to compete and award	Yes		09/24/2019
	a RA tracking system contract.			
04/30/2020	Train RA Coordinators and transition bureaus to new	Yes		09/30/2020
	RA Tracking system.			
05/29/2020	Implement RA tracking system.	Yes		07/30/2020

09/30/2022	IRS will continue communication with OCRD and	Yes		
	system moderators to implement enhancements for			
	successful migration to Treasury-wide RA tracking			
	system.			

Fiscal Year	Accomplishments
2018	N/A
2019	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.
	OCRD secured required funding for Treasury-wide RA tracking system and awarded the contract to MicroPact.
2020	In FY 2020, OCRD implemented the Treasury-wide RA tracking system, trained RA Coordinators, and transitioned
	the bureaus to the new system, with the exception of IRS. IRS requested further customization for the new system.
	In the interim, IRS maintained their prior RA tracking system. Implementation of the customized features are
	anticipated for FY 2021.
	IRS slightly improved its timely processing of RA cases in FY 2020 (28% timely processed). In February 2020,
	the IRS began a Lean Six Sigma (LSS) evaluation of its RA processes. In July 2020, the LSS team concluded the
	data gathering phase of the study. In order to better position the LSS team to analyze the data and formulate
	recommendations on processes to increase efficiency in responding and fulfilling requests for reasonable
	accommodation, the IRS initiated additional partners to the process to include senior subject matter experts
	from the Facilities Management & Security Services and Information Technology functions. The LSS team expects
	to present its findings and recommendations for changes to leadership to implement processes in Fiscal Year
	2021. Those recommendations will need to be vetted with partner support functions and might necessitate either
	contract or impact bargaining with the union before implementation.
2021	As of June 2021, IRS continued to make improvements regarding timely processing of RA cases (31% timely
	processed].
	Following data gathering including eliciting input from all Business Units, the LSS team identified several 'quick-
	hits' which were socialized with all Business Units and implemented. The quick-hits pertained to expediting
	accommodation request assessment and approval/denial as well as fulfillment of accommodation needs involving
	adaptive technology or furniture and workspace modifications. Preliminary data suggest the quick-hits are yielding
	beneficial results. An additional recommendation to maintain an inventory of hardware components commonly used
	to address RA needs was accepted and the Service is moving to address logistical challenges and establish the
	inventory. Having a ready inventory will expedite delivery of adaptive technology accommodations as procurement
	actions will already have taken place. One more proposal for reducing RA fulfillment time is being finalized.

## 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.a.5	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 Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21,
	2015); Complainant v. Dep't of Defense (Defense Commissary Agency), 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	Objective	Target Date	Modified Date	Date Completed
(mm/dd/yyyy)		(mm/dd/yyyy)	(mm/dd/yyyy)	(mm/dd/yyyy)
10/01/2019	Ensure Treasury and its bureaus conduct a prompt	9/30/2020		
	inquiry (beginning within 10 days of notification) of all			
	harassment allegations, including those initially raised			
	in the EEO complaint process.			

### **Responsible Official(s)**

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

Target Date	Planned Activities	Sufficient Funding	Modified Date	Completion
(mm/dd/yyyy)		& Staffing?	(mm/dd/yyyy)	Date (mm/dd/
		(Yes or No)		уууу)
10/01/2019	Monitor implementation of FS and OCC's planned	Yes		
	activities to ensure prompt initiation (beginning within			
	10 days of notification) of all harassment allegations,			
	including those initially raised in the EEO complaint			
	process.			
10/01/2020	In FY 2020, OCRD will explore the procurement of a	Yes		09/30/2020
	Treasury-wide Anti-Harassment Tracking System.			

09/30/2021	In FY 2021, OCRD will meet with each of the bureaus	Yes		
to ensure they are accurately calculating timeframes				
for conducting Harassment inquiries.				

Fiscal Year	Accomplishments
2020	In FY 2020, OCRD worked with the Office of the Chief Information Officer (OCIO) to explore several solutions to
	serve as a Treasury-wide tracking system for anti-harassment complaints. OCRD actively demonstrated a system to
	determine its effectiveness. In FY 2021, OCRD will continue to work with OCIO to see if there is system suitable to
	meet Treasury's requirements.
	In FY 2020, FS conducted 52 investigations, all of which were initiated within 10 calendar days of receipt of the
	complaint. This deficiency is CLOSED for FS.
	In FY 2020, OCC conducted 40 investigations, of which 33 were timely (83%). On OCC's Part G, it was stated that
	there were occasions in which employees who raised allegations failed to participate in the investigatory process
	or the process was extended. For example, after making allegations, employees resigned, went on extended leave,
	and/or failed to respond to requests for follow-up. In some instances, allegations were raised by management
	officials, with no follow through by the employees. Thus, efforts to conduct a prompt inquiry had to be postponed.
	The OCC will begin an internal review process in FY 2021 to examine the program and such occasions to
	determine if changes are needed.
2021	In FY 2021, OCC modified the Anti-Harassment policy for compliance with EEOC mandatory requirements;
	additionally, OCC modified and posted the annual training on safe workplaces and preventing sexual harassment
	for all employees and managers. Throughout FY 2021, OCC conducted mandatory orientation sessions for new
	managers, including topics such as Merit System Principles and Prohibited Personnel Practices.
	Based on the modified Anti-Harassment policy, OCC incorporated a more streamlined interface with Acquisitions in
	the Statement of Work (SOW) for the re-compete of the current investigatory contract. Within the updated SOW,
	language requiring contemporaneous inquiries to be conducted promptly and the availability of multiple investigators
	was inserted.
	Additionally, an EEO/Diversity Performance element was included for management annual reviews. This deficiency is CLOSED for OCC.

### 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	
Х	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	

### **Barrier Analysis Process**

Sources of Data	Source	Identify Information Collected
	Reviewed? (Yes or No)	
Workforce Data Tables	Yes	<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).
		<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 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.
		<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 participation rate for women falls below the Occupational CLF (OCLF) availability rate in the following six series:
		<ul> <li>0301: Miscellaneous Administration and Program, participation (60.18 percent) falls below the OCLF availability rate of 63.30 percent;</li> </ul>
		• 0340: Program Management, participation (58.36 percent) falls below the OCLF availability rate of 63.30 percent;
		<ul> <li>0512: Internal Revenue Agent, participation (53.24 percent) falls below the OCLF availability rate of 64.20 percent;</li> </ul>
		<ul> <li>0570: Financial Institution Examining, participation (38.38 percent) falls below the OCLF availability rate of 45.30 percent;</li> </ul>
		<ul> <li>0962: Contact Representative, participation (71.71 percent) falls below the OCLF availability rate of 82.10 percent; and</li> </ul>
		<ul> <li>1169: Internal Revenue Officer, participation (57.95 percent) falls below the OCLF availability rate of 64.20 percent.</li> </ul>
		<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:
		• 0301: Miscellaneous Administration and Program 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.

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected			
		O340: Program Management     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.			
		<ul> <li>0512: Internal Revenue Agent</li> <li>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> </ul>			
		<ul> <li>O570: Financial Institution Examining         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 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.     </li> </ul>			
		<ul> <li>D962: Contact Representative</li> <li>There are no positions in Treasury in the O962 series at the GS-13 and above grade</li> <li>level. All positions in the O962 series are GS-11 and below.</li> </ul>			
		<ul> <li>1169: Internal Revenue Officer         At the GS-13 and 14 grade levels, the participation rate for Women (54.96 percent and 47.52 percent respectively) falls 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>			
		<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.			
		<u>GS-13</u> New Hires: 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.			
		<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.			

Sources of Data Sou	Identify Information Collected			
	wed? or No)			
	<u>GS-14</u> New Hires: 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.			
	Internal Competitive Promotions: 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.			
	<u>GS-15</u> New Hires: 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.			
	Internal Competitive Promotions: 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.			
	SES New Hires: 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.			
	<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.			
	<b>A85:</b> A review of new hire data by those major occupations identified in the A6 and A4-1 shows that:			
	<ul> <li>D3D1: Miscellaneous Administration and Program</li> <li>At the GS-13, 14, 15, and SES grade levels, the participation rates 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> </ul>			

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<ul> <li>0340: Program Management</li> <li>In FY 2019, all hires in the 0340 series were at the SES grade level. Of those hires,</li> <li>23.08 percent were Women, falling below the OCLF availability rate of 63.30 percent.</li> </ul>
		<ul> <li>0512: Internal Revenue Agent         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> </ul>
		<ul> <li>0570: Financial Institution Examining         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 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).     </li> </ul>
		<ul> <li>1169: Internal Revenue Officer</li> <li>In FY 2019, the participation rate for Women new hires (60.00 percent) fell below</li> <li>the OCLF availability rate of 64.20 percent.</li> </ul>
		<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).
		<b>A14S2:</b> A review of new separation data by those major occupations identified in the A6 and A4-1 shows that:
		<ul> <li>O301: Miscellaneous Administration and Program         At the GS-13, 14, 15, and SES grade levels, the participation rates for separations             of Women (55.88 percent, 52.78 percent, 48.72 percent, and 25.00 percent             respectively) fell below the availability rate of 60.18 percent.     </li> </ul>
		<ul> <li>O340: Program Management         At the GS-13, 14, and SES grade levels, the participation rates for separations of             Women (75.00 percent, 66.67 percent, and 62.50 percent respectively) exceeded             the availability rate of 58.36 percent. At the GS-15 grade levels, the participation             rate for separations (48.78 percent) fell below the availability rate (58.36 percent).     </li> </ul>
		• 0512: Internal Revenue Agent At the GS-13 and 14 grade levels, the participation rate for separations (45.24 percent and 48.85 percent) fell below the availability rate of 53.24 percent. At the GS-15 grade level, the participation rate for separations (100.00 percent) exceeded the availability rate of 53.24 percent.
		<ul> <li>0570: Financial Institution Examining* At the GS-13, 14, 15, and SES grade levels, the participation rates for separations (39.68 percent, 41.38 percent, 38.89 percent, and 66.67 percent respectively) exceed the availability rate (38.38 percent).</li> </ul>

Sources of Data	Source	Identify Information Collect	ed			
	Reviewed?					
	(Yes or No)					
		0962: Contact Represel     In FX 2010, all apparation		the CC 11 and below grade		
		levels.	ns in the 1169 series were in t	ne 65-1 i and below grade		
		• 1169: Internal Revenue	Officer			
		percent) fell below the av 15 grade levels, the part	, the participation rate for sepa vailability rate (57.95 percent); icipation rate for separations (f ceeded the availability rate (57.9	nowever, at the GS-14 and 66.67 percent and 100.00		
Complaint Data (Trends)	Yes	FY 2019				
			blaints were filed with the Depa ( (Female) as one of the bases f			
		In FY 2019, of the 76 comple Sex (Female) as one of the ba	ints that reached Settlement, ' ses for the complaint.	16 (21.05 percent) identified		
			plaints were filed with the Depa ( (Female) as one of the bases f			
		In FY 2020, of the 93 compla	ints that reached Settlement, 2	23 (24.73 percent) identified		
		Sex (Female) as one of the bases for the complaint.				
		In FY 2020, there were no fir	idings of discrimination on the b	asis of Sex (Female).		
Grievance Data (Trends)	No		0			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No					
Climate Assessment	Yes	Of those Treasury responden	ts in the FY 2019 FEVS, 58% v	vere Female.		
Survey (e.g., FEVS)			Men	Women		
		Overall New IQ	66.52%	62.24%		
		Fairness	56.16%	50.34%		
		Open-Minded	66.35%	60.48%		
		Cooperative	63.75%	61.40%		
		Supportive	84.66%	80.50%		
		Empowerment	61.70%	58.48%		
		Among the overall New IQ sco	ores, and the scores for each c	ategory (Fairness, Open-		
		minded, Cooperative, Support	ive, and Empowerment), Wome	en positive scores fell below		
		Men positive scores in the ov	erall score and each of the cate	egories.		
		For item number 34, "Policies and programs promote diversity in the workplace (for				
		example, recruiting minorities and women, training in awareness of diversity issues,				
		mentoring)," Treasury scored	59.9%, which falls below the "p	ositive" threshold of 65%.		
		Treasury Women scored 57.5% while Treasury Men scored 66.1%.				
		For item 37, "Arbitrary action, personal favoritism and coercion for partisan political				
		purposes are not tolerated," Treasury scored 59.0%, which falls below the "positive"				
		· · · · · · · · · · · · · · · ·	,			

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected			
		For item 38, "Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated," Treasury scored 69.3%, which exceeds the "positive" threshold of 65%. Treasury Women scored 67.7% while Treasury Men scored 74.7%.			
		For item 45, "My supervisor is committed to a workforce representative of all segments of society," Treasury scored 75.8%, which exceeds the "positive" threshold of 65%. Treasury Women scored 74.5% while Treasury Men scored 80.1%.			
		For item 49, "My supervisor treats me with respect," Treasury scored 85.8%, which exceeds the "positive" threshold of 65%. Treasury Women scored 85.2% while Treasury Men scored 88.4%.			
		For item 55, "Supervisors work well with employees of different backgrounds," Treasury scored 69.4%, which exceeds the "positive" threshold of 65%. Treasury Women scored 67.9% while Treasury Men scored 74.2%			
		In FY 2015, Treasury received Exit Survey responses from 1232 Women (permanent). The majority of separating women were employed for More than 25 years (57.22% or 705), followed by 13-15 years (17.29% or 213), 4-6 years (11.12% or 137), 7-9 years (5.93% or 73), 1-3 years (4.06% or 50), 10-12 years (3.57% or 44), and less than 1 year (0.81% or 10). Of the respondents, 85.23% (1050) were GS or equivalent; of the "Other" pay systems, 55.42% (97) were IR and 40.57% (71) were NB. Of the respondents, 33.93% (418) were 13-15 or equivalent, 32.71% (403) were 9-12 or equivalent, 29.06% (358) were 5-8 or equivalent, 3.33% (41) were 1-4 or equivalent, and 0.97% (12) were SES or equivalent.			
		The majority of respondents, 11.12% (127) were 0592: Tax Examining, followed by 9.09% (112) were 0962: Contact Representative, 7.79% (96) were 0512: Internal Revenue Agent, 7.55% (91) were 0501: Financial Administration & Program, and 6.25% (77) were 2210: Information Technology Management. Of the respondents, 44.97% (554) were 60 and Over, 33.12% (408) were 50-59,			
		<ul> <li>9.25% (114) were 30-39, 7.55% (93) were 40-49, and 4.79% (59) were 18-29.</li> <li>Retirement accounted for 72.72% (896) of the respondents; of those retiring, 33.37%</li> <li>(299) were eligible for less than 1 year, 21.65% (194) were eligible for 1-2 years,</li> <li>20.65% (185) were eligible for 3-4 years, 16.29% (146) were eligible for 5-7 years,</li> <li>5.02% (45) were eligible for 10+ years, and 3.01% (27) were eligible for 8-9 years.</li> </ul>			
		The factors most frequently cited as having an impact on the decision to separate were Job-Related Stress, Office Morale, Resources available to do the job, the Office's organization and alignment with regard to effective and efficient service, resources available to do job, and ability to participate in decision-making.			
		The majority of female respondents, 82.39% (1015), stated that their work experience was generally positive and 59.90% (738) stated that they would return to work for Treasury. Of the respondents, 71.10% (876) stated that they would recommend Treasury as a good place to work.			

Sources of Data	Source	Identify Information Collected			
	Reviewed?				
	(Yes or No)				
		<b>FY 2016</b> In FY 2016, Treasury received Exit Survey responses from 1136 Women (permanent). The majority of separating women were employed for More than 25 years (57.66%, or 655), followed by 13-25 years (16.55% or 188), 7-9 years (9.15% or 104), 4-6 years (6.07% or 69), 10-12 years (5.02% or 57), 1-3 years (3.61% or 41), and less than 1 year (1.94% or 22). Of the respondents, 85.83% (975) were GS or equivalent; of the "Other" pay systems, 64.33% (101) were IR and 33.76% (53) were NB. Of the respondents, 34.24% (389) were 13-15 or equivalent, 32.22% (366) were 9-12 or equivalent, 28.35% (322) were 5-8 or equivalent, 4.40% (50) were 1-4 or equivalent, and 0.79% (9) were SES or equivalent. The majority of respondents, 11.53% (131) 0592: Tax Examining, followed by 9.51%			
		(108) were 0962: Contact Representative, 9.33% (106) were 0343: Management & Program Analysis, 7.04% (80) were 0501: Financial Administration & Program, and 6.34% (72) were 2210: Information Technology Management.			
		Of the respondents, 46.57% (59) were 60 and Over, 31.51% (358) were 50-59, 10.04% (114) were 30-39, 7.83% (89) were 40-49, and 3.70% (42) were 18-29.			
		Retirement accounted for 72.45% (823) of the respondents; of those retiring, 30.98% (255) were eligible for less than 1 year, 23.82% (196) were eligible for 1-2 years, 18.83% (155) were eligible for 3-4 years, 15.19% (125) were eligible for 5-7 years, 7.17% (59) were eligible for 10+ years, and 4.01% (33) were eligible for 8-9 years.			
		The factors most frequently cited as having an impact on the decision to separate were Job-Related Stress, Office Morale, Ability to participate in decision-making, the Office's organization and alignment with regard to effective and efficient service, and access to developmental opportunities.			
		The majority of respondents, 85.92% (976) stated that their work experience was generally positive and 63.20% (718) stated that they would return to work for Treasury. Of the respondents, 74.65% (848) stated that they would recommend Treasury as a good place to work.			
		<b>FY 2017</b> In FY 2017, Treasury received Exit Survey responses from 1078 Women (permanent). The majority of separating women were employed for More than 25 years (61.78%, or 666), followed by 13-25 years (14.56%, or 157), 7-9 years (6.77%, or 73), 10-12 years (5.38%, or 58), 4-6 years (4.64%, or 50), less than 1 year (3.62%, or 39), and 1-3 years (3.25%, or 35). Of the respondents, 83.95% (905) were GS or equivalent; of the "Other" pay systems, 67.86% (114) were IR and 29.76% (50) were NB. Of the respondents, 33.02% (356) were 9-12 or equivalent, 31.73% (342) were 5-8 or equivalent, 31.45% (339) were 13-15 or equivalent, 3.06% (33) were 1-4 or equivalent, and 0.74% (8) were SES or equivalent.			
		The majority of respondents, 11.60% (125) were 0592: Tax Examining, followed by 11.32% (122) were 0962: Contact Representative, 8.72% (94) were 0501: Financial			

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		Administration & Program, 6.49% (70) were 1169: Internal Revenue Officer, 6.22% (67) were 0343: Management & Program Analysis, and 6.22% (67) were 2210: Information Technology Management.
		Of the respondents, 46.85% (505) were 60 and Over, 32.84% (354) were 50-59, 8.91% (96) were 30-39, 6.68% (72) were 40-49, and 3.80% (41) were 28-29.
		Retirement accounted for 73.84% (796) of the respondents; of those retiring, the majority, 29.02% (231) were eligible for less than 1 year, followed by 22.99% (183) eligible for 1-2 years, 18.22% (145) eligible for 5-7 years, 17.59% (140) eligible for 3-4 years, 7.41% (59) eligible for 10+ years, and 4.77% (38) eligible for 8-9 years.
		The factors most frequently cited as having an impact on the decision to separate are Job-Related Stress, Office Morale, Reasonableness of Workload, Ability to Participate in Decision-Making, Resources Available to do Job, and Pay Level in Relation to Job Responsibilities and Performance.
		The majority of respondents, 82.75% (892) stated that their work experience was generally positive and 61.04% (658) stated that they would return to work for Treasury. Of the respondents, 72.36% (780) stated that they would recommend Treasury as a good place to work.
		FY 2018
		In FY 2018, Treasury received Exit Survey responses from 1131 Women (permanent). The majority of separating women were employed for More than 25 years (61.10%, or 691), followed by 13-25 years (18.21% or 206), 7-9 years (6.37% or 72), 10-12 years (6.01% or 68), 1-3 years (4.16% or 47) 4-6 years (2.92% or 33), and less than 1 year (1.24% or 14). Of the respondents, 87.27% (987) were GS or equivalent; of the "Other" pay systems, 61.43% (86) were IR, and 32.86% (46) were NB. Of the respondents, 34.39% (389) were 13-15 or equivalent, 32.45% (367) were 9-12 or equivalent, 27.59% (312) were 5-8 or equivalent, 4.95% (56) were 1-4 or equivalent, and 0.62% (7) were SES or equivalent.
		The majority of respondents, 10.96% (124) were 0962: Contact Representative, 10.43% (118) were 0592: Tax Examining, 9.37% (106) were 0501: Financial Administration & Program, 7.78% (88) were 0512: Internal Revenue Agent, 6.90% (78) were 0343: Management & Program Analysis, and 6.56% (73) were 2210: Information Technology Management.
		Of the respondents, 48.19% (545) were 60 and Over, 34.22% (387) were 50-59, 7.25% (82) were 30-39, 6.90% (78) were 40-49, and 2.65% (30) were 18-29.
		Retirement accounted for 76.13% (861) of the respondents; of those retiring, the majority, 30.78% (265) were eligible for less than 1 year, 21.95% (189) were eligible for 1-2 years, 19.40% (167) were eligible for 3-4 years, 17.07% (147) were eligible for 5-7 years, 6.27% (54) were eligible for 10+ years, and 4.53% (39) were eligible for 8-9 years.

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected			
		The factors most frequently cited as having an impact on the decision to separate were Job-Related Stress, Office Morale, Ability to Participate in Decision-Making, Access to Developmental Opportunities, and Reasonableness of Workload.			
		The majority of respondents, 82.67% (935) stated that their work experience was generally positive and 58.53% (662) stated that they would return to work for Treasury. Of the respondents, 71.97% (814) stated that they would recommend Treasury as a good place to work.			
		FY 2019			
		In FY 2019, Treasury received Exit Survey responses from 940 Women (permanent). The majority of separating women were employed for More than 25 years (55.53%, or 522), followed by 13-25 years (19.47%, or 183), 10-12 years (6.91%, or 65), 1-3 years (5.85%, or 55), 7-9 years (5.43%, or 51), 4-6 years (4.15%, or 39), and less than 1 year (2.66%, or 25). Of the respondents, 86.91% (817) were GS or equivalent and 0.53% (5) were WG or equivalent; of the "Other" pay systems, 53.91% (62) were IR, and q45.22% (52) were NB. Of the respondents, 35.32% (332) were 13-15 or equivalent, 32.23% (303) were 9-12 or equivalent, 26.49% (249) were 5-8 or equivalent, 5.74% (54) were 1-4 or equivalent, and 0.21% (2) were SES or equivalent.			
		The majority of respondents, 11.60% (109) were in 0592: Tax Examining, 9.04% (85) were 0962: Contact Representative, 8.51% (80) were 0501: Financial Administration & Program, 6.91% (65) were 0343: Management & Program Analysis, and 6.38% (60) were 2210: Information Technology Management.			
		Of the respondents, 45.64% (429) were age 60 and Over, 32.77% (308) were 50-59, 9.36% (88) were 30-39, 8.19% (77) were 40-49, and 2.98% (28) were 18-29.			
		Retirement accounted for 71.17% (669) of the respondents; of those retiring, the majority, 30.79% (206) were eligible for less than 1 year, 24.22% (162) were eligible for 1-2 years, 18.54% (124) were eligible for 3-4 years. 15.10% (101) were eligible for 5-7 years, 6.73% (45) were eligible for 10+ years, and 4.63% (31) were eligible for 8-9 years.			
		The factors most frequently cited as having an impact on the decision to separate were Job-Related Stress, Office Morale, Resources available to do Job, Ability to Participate in Decision-Making, and Reasonableness of Workload.			
		The majority of respondents, 84.04% (790) stated that their work experience was generally positive and 60.32% (567) stated that they would return to work for Treasury. Of the respondents, 75.53% (710) stated that they would recommend Treasury as a good place to work.			
		FY 2020			
		In FY 2020, Treasury received Exit Survey responses from 786 Women (permanent). The majority of separating women were employed for More than 25 years (58.27% or 458), followed by 13-25 years (16.03% or 126), 10-12 years (7.51% or 59), Less than			

Sources of Data	Source	Identify Information Collected				
	Reviewed?					
	(Yes or No)	1 year (5.47% or 43), 4-6 years (4.45% or 35), 7-9 years (4.20% or 33), and 1-3 years (4.07% or 32). Of the respondents, the majority, 85.11% (669), were GS or equivalent; of the "Other" pay systems, 51.33% (58) were IR, 47.79% (54) were NB, and 0.88% (1) was TR. Of the separations, 39.82% (313) were from 13-15 or equivalent grades, 30.53% (240) were 9-12 or equivalent, 25.70% (202) were 5-8 or equivalent, 3.31% (26) were 1-4 or equivalent, and 0.64% (5) were SES or equivalent.				
		The majority of respondents (74, or 9,41%) were in 0512 Internal Revenue Agent, followed by 0962: Contact Representative (73, or 9.29%), 0592: Tax Examining (69, or 8.78%), 0343: Management & Program Analysis (65, or 8.27%), 0501: Financial Administration & Program (59, or 7.51%), and 2210: Information Technology Management (48, or 6.11%).				
		Of the respondents, 44.40% (349) were age 60 and Over, 33.72% (265) were 50-59, 9.54% (75) were 30-39, 7.25% (57) were 40-49, and 2.94% (31) were 3.94% (31) were 18-29.				
		Retirement accounted for 63.49% (499) of the respondents; of those retiring, the majority, 30.46% or 152, were eligible for less than 1 year, followed by 22.44% (112) eligible for 1-2 years, 18.64% (93) eligible for 3-4 years, 16.42% (82) eligible for 5-7 years, 7.01% (35) eligible for 10+ years, and 5.01% (25) eligible for 8-9 years.				
		The factors most frequently cited as having an impact on the decision to separate from the agency were Job-Related Stress, Office Morale, Pay Level in Relation to Job Responsibilities and Performance, Access to Developmental Opportunities, and Reasonableness of Workload.				
		The majority of respondents (86.39%, or 679) stated that their work experience was generally positive, and 63.61% (500) stated they would return to work for Treasury. Of the respondents, 79.26% (623) stated that they would recommend Treasury as a good place to work.				
Focus Groups	No					
Interviews Reports (e.g., Congress, EEOC, MSPB, GAO,	No					
OPM)						
Other (Please Describe)	No					

### **Status of Barrier Analysis Process**

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

### Statement of Identified Barrier(s)

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

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

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

### **Responsible Official(s)**

Title	Name	Performance Standards Address the Plan	
		(Yes or No)	
Acting Director, OCRD	Snider Page	Yes	

Target Date	Planned Activities	Modified Date	Completion
(mm/dd/yyyy)		(mm/dd/yyyy)	Date (mm/dd/
			уууу]
12/30/2019	Reach out to EEO Officers for those bureaus (DO and IRS) with noted		12/20/2019
	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		12/30/2020
	2020 to identify trends for Women perceptions in the workforce.		
09/30/2020	Identify a high-level Treasury Barrier Analysis Team, a working group that		09/30/2020
	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		03/10/2021
	phases (analysis, methods, resources, senior leadership support).		
03/30/2021	Treasury Barrier Analysis Team will implement plan.		03/10/2021
05/31/2021	Treasury Barrier Analysis Team will collect data.		04/21/2021
07/30/2021	Treasury Barrier Analysis Team will analyze and report data.		05/13/2021

06/31//2021	Treasury Barrier Analysis Team will create additional action plan to	06/09/2021
	eliminate identified barrier(s).	
03/31/2022	Bureau sub-committees will be formed with relevant parties.	
06/30/2022	Bureau sub-committees will review policies, procedures, practices, and	
	conditions relevant to the occupation.	
09/30/2022	Bureaus will have a bureau-specific action plan developed to eliminate	
	identified barrier(s).	

Fiscal Year	Accomplishments
FY 2020	The Barrier Analysis Working Group (BAWG) was formed in September 2020, consisting of members from
	each bureau. Treasury Female exit survey responses were reviewed.
FY 2021	In FY 2021, the BAWG identified a plan for addressing lower than expected participation rates for Women in
	the GS 13-15 and SES grades.
	Because each bureau has a different mission, each bureau's workforce is also different, and therefore, each
	bureau has different conditions, practices, and policies that affect each bureau individually. Each bureau
	reviewed workforce data and identified one or two mission-critical and/or most populous occupations where
	female participation rates at the GS-13 and above grade levels consistently falls below the respective availability
	rate. In FY 2021, most bureaus have formed sub-working groups consisting of sub-component EEO personnel
	(if applicable), HR, and hiring managers/supervisors. Bureaus are analyzing their data to identify triggers within
	various phases of employment, including recruitment and outreach.
	The Treasury-wide BAWG meets monthly to discuss plans and progress, as well as to identify any challenges to
	completing the barrier analysis efforts.

### 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.

• Cluster GS-11 to SES (PWD) Yes O No X

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.

• Cluster GS-1 to GS-10 (PWTD)	Yes O	No X
• Cluster GS-11 to SES (PWTD)	Yes O	No X

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

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

### Section II: Model Disability Program

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

### A. Plan to Provide Sufficient & Competent Staffing for the Disability Program

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year. Yes X No O

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

	# of FTE Staff by Employment Status		oyment Status	Deepeneikle Official	
Disability Program Task	Full Time	Part Time	Collateral	Responsible Official	
			Duty	(Name, Title, Office, Email)	
Processing applications from PWD and PWTD	60	14	20	See specific bureau PART J's.	
Answering questions from the public about hiring	55	1	20	See specific bureau PART J's.	
authorities that take disability into account					
Processing reasonable accommodation requests from	46	2	12	See specific bureau PART J's.	
applicants and employees					
Section 508 Compliance	207	0	2	See specific bureau PART J's.	
Architectural Barriers Act Compliance	19	1	319	See specific bureau PART J's.	
Special Emphasis Program for PWD and PWTD	15	0	5	See specific bureau PART J's.	
NOTE: 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.					

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

No O

In Fiscal Year (FY) 2021, the Office of Civil Rights and Diversity (OCRD) provided training sessions to the bureaus' staff on an asneeded basis regarding the PARTJ and use of the new MD-715 V2 workforce data tables. OCRD and the bureau's Disability Program Managers also participated in the quarterly Federal Exchange on Employment and Disability (FEED) meetings, hosted by the Equal Employment Opportunity Commission (EEOC) and Department of Labor (DOL), which educates attendees on various issues and topics related to disability.

The bureau Disability Program Managers and Reasonable Accommodation Coordinators received refresher training on the new Reasonable Accommodation (RA) Tracking System that was deployed in FY 2020. Ongoing private sessions are offered on an asneeded basis.

Annually, all HR professionals are required to complete online courses related to veteran's employment, which include disability components. This training, provided by the Department, is mandated by Executive Order (EO) 13518.

# B. Plan to Ensure Sufficient Funding for the Disability Program

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

Yes X No O

## 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 DOL's WRP Training, Treasury sponsored Bender Consulting Job Fair, and the Treasury Department's Veteran Employment Summit to market Treasury and its job opportunities.

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

The Schedule A Hiring Authority is promoted and available for use along with Veterans Appointment Authorities to non-competitively appoint PWD/PWTD and veterans with a service-connected disability rating of 30% or more. The agency has incorporated the use of non-competitive hiring authorities into management discussions and training, and strongly encourages the use of non-competitive hiring authorities under both Schedule A for Individuals with Disabilities and the 30% or More Disabled Veterans authority for recruiting PWD and PWTD in the permanent workforce. The Human Resources Office forwards qualified applicant resumes from the Special Placement Program Coordinator to hiring officials for review and consideration.

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

When applicants utilize the Schedule A Hiring Authority, the process for eligibility and hire encompass:

1) An 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; and

2) Applicant referral - individuals deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures, this includes the application of veterans' preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, Veterans' Recruitment Appointment (VRA), etc.).

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

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

Yes X No O

N/AO

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

# B. Plan to Establish Contacts with Disability Employment Organizations

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

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

Meetings with professional organizations such as Wounded Warriors and DVRC are held periodically to share Treasury's process for providing vacancy announcements, and share information about opportunities, including career development tracks. Continue to coordinate and participate in career job fairs with organizations i.e., Bender Consulting who provides opportunities for hiring persons with disabilities.

## 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.

•	New Hires for Permanent Workforce (PWD)	Yes O	No X
•	New Hires for Permanent Workforce (PWTD)	Yes O	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.

• New Hires for MCO (PWD)	Yes X	No O
• New Hires for MCO (PWTD)	Yes X	No O

Data from the Treasury Workforce Analytics (WA) Table B6 V2 (permanent workforce): New hires by Occupational Series and Monster Table B6 V2 (permeant workforce) (mission-critical occupations) were analyzed to identify triggers among the following new hires:

FY 2021 New Hires	Qualified vs. New Hires	Qualified vs. New Hires
0110 (21)	PWD: 10.11% - 4.76%**	PWTD: 6.74% - 0.00%* *
0301 (55)		PWTD: 8.31% - 16.36% * *
0340 (4)	PWD: 32.69% - 0.00%***	PWTD: 15.38% - 0.00%***
0343 (26)		PWTD: 11.87% - 7.69%**
0501 (84)		PWTD: 12.84% - 9.52% * *
0511 (13)	PWD: 19.71% - 7.69%***	PWTD: 6.45% - 0.00%***
0905 (47)	PWD: 11.74% - 2.13%**	PWTD: 5.30% - 0.00%* *
1811 (89)	PWD: 9.52% - 3.37%*	PWTD: 3.17% - 0.00%*

\*The 1811 or Criminal Investigators occupation, limits the employment opportunities available for PWTD based on the Office of Personnel Management (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.

\*\*Triggers were noted when comparing the qualified applicant flow data with the new hires for PWD and PWTD in the 0110, 0301,0340, 0343, 0501, 0511, 0905, 1811, and occupational series. For the Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART J. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in their specific bureau's PART J. Treasury will monitor the Part J developed by each bureau 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 determined a threshold of 50 new hires. Any hire rate less than 50, will not support a statistically significant outcome. The occupations with limited hiring, 0110, 0340, 0343, 0511 and 0905, did not have enough hires to determine if there is an actual trigger.

**NOTE:** It is important to note that when the Department looks at Treasury-wide data as a whole, the progress noted may not be an accurate reflection of the true progress of each bureau. The consolidated view of the data may mask where potential barriers 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. The OCRD requested the bureaus to complete detailed analyses to determine if any PWD or PWTDs are facing a potential glass ceiling, blocked pipeline, or glass wall; and based on their findings, develop plans to eliminate identified barriers.

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

• Qualified Applicants for MCO (PWD)	Yes O	No X
• Qualified Applicants for MCO (PWTD)	Yes O	No X

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

• Promotions for MCO (PWD)	Yes X	No O
• Promotions for MCO (PWTD)	Yes X	No O

Data from the Treasury WA Table B6 V2 (permanent workforce): by Occupational Series and Monster Table B6 V2 (permanent workforce) (mission-critical occupations) were analyzed to identify promotions, indicating the following results:

FY 2021 Promotions	Qualified Applicants	Qualified Applicants
to MCOs	vs. Internal Promotions	vs. Internal Promotions
0301 (21)	PWD: 44.85% - 23.81%	PWTD: 20.96% - 9.52%*
0340 (13)	PWD: 51.09% - 46.15%	PWTD: 18.48%-15.38% *
0343 (71)	PWD: 41.64% - 25.35%	PWTD: 18.19%-11.27%
0501 (166)	PWD: 32.88% - 21.69%	PWTD: 14.46% - 9.64%
0570 (71)	PWD: 13.64% - 7.04%	PWTD: 3.03% - 1.46%
1169 (88)	PWD: 22.33% - 18.18%	PWTD: 10.69 - 11.36%
1811 (12)		PWTD: 0.00% - 0.00% *
2210(121)	PWD: 38.20% - 31.40%	PWTD: 17.91% - 17.36%

The following triggers were identified:

Treasury noted a trigger between the qualified applicants and the actual promotions in all occupational series, except in the series 1811 for PWD and 1169 for PWTD. Those Treasury bureaus that noted triggers in their workforce evaluation are noted in their PART J reporting. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau's PART J. Treasury will monitor the Part J developed by each bureau to ensure appropriate plans are developed to eliminate any identified barriers.

\* When there is limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury determined a threshold of 50 hires or less is not enough hires to expect that all groups would be hired at rates comparable to their qualification rates. For those occupations (1811) with limited hiring, there were not enough hires resulting in internal promotions to determine if there is an actual trigger.

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

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

## A. Advancement Program Plan

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

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

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

Treasury encourages diverse employee (including PWD/PWTD) participation in management, leadership and career development programs through employee resource groups (ERGs), such as the Adelante' which is a Hispanic ERG and the VERG which is the Veteran's ERG. There are a host of other communication venues throughout the agency. Developmental opportunities are broadly communicated to all employees through internal weekly and monthly newsletters, internet website postings, and shared by ERGs.

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 (IDP) process. All development opportunity announcements are posted on the Treasury's internal website.

In conjunction with available training, Treasury will explore over the next two years, the development of a committee composed of bureau diversity, equity inclusion, and accessibility (DEIA) representatives to explore additional opportunities (e.g., mentoring) to the disabled community.

## B. Career Development Opportunities

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

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

The Treasury Executive Institute (TEI) offers Departmental Offices (DO) employees the opportunity for 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. The Bureau of Engraving and Printing (BEP) offers a series of programs for GS 7-15 employees or equivalent. Programs include:

- The New Leaders Program (GS 7-11 employees or equivalent). This program focuses on developing future public service leaders and includes leadership self-assessments, experiential learning, and individual development opportunities integrated into a competency-based learning approach.
- The Executive Leadership Program (GS 12-13 employees or equivalent). This program enhances support to organizational mission and goals, focusing specifically on the competency of "leading people" through developmental activities and experiences.
- The Executive Potential Program (GS 14-15 employees or equivalent), a competency-based leadership program that prepares high-potential employees to focus on leading change effectively at the senior level.

• The Career Development Program (GS-11 and below or equivalent) provides upward mobility via defined career training using individual career development plans for training and other opportunities to employees, who positions offer limited promotion potential, for placement into positions in other occupational series for which they would not otherwise be qualified.

Bureau of Fiscal Service (FS) encourages all employees to take advantage of the 40 hours of training available to all employees as supported by the service wide training budget and the individual Assistant Commissioner's training budget. The Commissioner's Scholarship Program and the Certification Exam Program are available to all employees. Managers are required to create Individual development plans (IDPs) to expand and build upon each of their employees' strengths. Managers are reminded to consider permanently assigned PWD/PWTD for development opportunities as part of their IDP process. FS offers career development opportunities to all employees via notices of opportunities, non-competitive details, and promotions, e.g., career-ladder positions, competitive details, and merit promotions. In addition, FS has a Mentoring Program with platforms to meet the needs of PWD, PWTD, and veterans. Developmental opportunities will continue to be broadly communicated to all employees through internet website postings.

IRS offers mentoring and career development programs throughout the Agency to support development of employees in both technical and leadership competencies. Career development tools include but are not limited to:

Details offered through the Service-wide Opportunity Listing website; Career Learning Plans (CLP) jointly developed by employees and their managers; Leadership Succession Review (LSR) process, which provides the opportunity for all employees interested in becoming managers to become actively involved with their development; Front Line Readiness Program (FLRP), designed to develop employees for front line manager positions; Senior Manager Readiness Program (SMRP), designed to develop competencies and skills necessary to prepare participants for Senior Manager (SM) positions; Senior Executive Service (SES) CDP, used to identify and hire career executives; Self-directed, Mentor web-based program pairs a more experienced person with someone interested in career development; and the Taxpayer Advocate Service (TAS) Intake Leadership Development Program (ILDP), designed to provide an opportunity for intake advocates and lead intake advocates to develop their leadership skills.

IRS-Chief Counsel (IRS-CC) solicited participants for the Executive Leadership and Development Program (ELDP) in December 2021. The ELDP will take place in FY 2022. The Human Resources Investment Fund (HRIF) training dollars were made available in FY 2021 for employees to use towards outside, job-related training.

The United States Mint (Mint) offers the following career development opportunities to its regional employees throughout:

Operator Certification Apprenticeship Program (OCAP) (San Francisco): OCAP ensures consistent and accurate training while strengthening the relationship between employee and supervisor through designed interaction. The training is structured and integrated to focus on developing Mint personnel to be competitive with Mint's manufacturing industry. Those employees who complete the Program will receive a nationally recognized certificate of apprenticeship that not only increases their competitiveness within Treasury, but it can be used within the industry.

The Manufacturer Certification Apprenticeship Program (MCAP) (Philadelphia and Denver): MCAP is a competency-based training and development program that allows employees to acquire the experience, knowledge, and skills necessary to perform the varied duties directly related to the manufacturing of coins and dies at the Mint. In short, it's cross-training. MCAP participants also receive a nationally recognized certificate, and the Program provides career growth and advancement opportunities.

The Office of Comptroller of the Currency (OCC) career development programs include:

• 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 expands professional development opportunities for bank examiners in pay band NB-IV in the eight specialty areas of the EXCEL I Program.
- The Honors Attorney Program is designed to provide cross-training and developmental assignments to equip attorneys with legal skills and experiences across multiple legal practices areas.
- The Leadership Exploration and Development (LEAD) Program is an enterprise-wide leadership development program targeted to employees at the NB-V to NB-VI.2 levels, to help develop specific competencies aligned to skills and abilities needed at the team leader and/or manager level.
- The Entry-Level Examiner Program, sponsored by Midsize and Community Bank Supervision, is a recruitment and career
  development program for entry-level bank examiner positions in pay bands NB-III and NB-IV. Assignments cover all areas of
  banking, including loans, interest rate risk, capital, liquidity, consumer protection programs, and compliance with banking laws
  and regulations. Through a program of continuing education and career development, OCC entry-level examiners expand their
  knowledge and skills in preparation for certification to National Bank Examiner at the pay band NB-V.
- The MCBS NB-V UCE Recognition Events for Bank Examiners provides bank examiners exposure to the career options available in the various bank supervision lines of business; resources and factors to consider when making career decisions; and the ability to learn more about leadership development.
- Agency training and development courses are available to all employees, in the classroom, online, virtual, and self-study.
- Temporary details and short-term work assignments are advertised to all employees on the agency's Opportunities Board.

The Financial Crimes Enforcement Network (FinCEN) offers career development opportunities to all employees via non-competitive details and promotions, e.g., career-ladder positions, competitive details, and merit promotions. Leadership development opportunities exist for all qualified employees through such programs as the New Leader Program, Executive Leadership Program, Executive Potential Program, Mentoring Program, FinCEN Career Development Toolkit, Leadership Development Program Guide, and the Women's Leadership Series (WLS).

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

Career Development	Total Participants		PWD		PWTD	
Opportunities*	Applicants (#)	Selectees (#)	Applicants	Selectees (%)	Applicants	Selectees (%)
			(%)		(%)	
Internship Programs						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development						
Programs						
*For bureau specific career develo	*For bureau specific career development opportunities, see bureau PART J's. Treasury has engaged business partners to consider					
taking necessary steps to create a plan of action to track the above requested data.						

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

• Applicants (PWD)	Yes O	No X	
Selections (PWD)	Yes O	No X	

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.

• Applicants (PWTD)	Yes O	No X
Selections (PWTD)	Yes O	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.

Awards, Bonuses, & Incentives (PWD)	Yes X	No O
• Awards, Bonuses, & Incentives (PWTD)	Yes X	No O

The Department analyzed data from the Treasury WA Table B9-2 against the inclusion rate indicating a continued trend with the following triggers:

The inclusion rate for PWD (11.65%) and PWTD (12.88%) in Time Off Awards (1-10 hours), was below the inclusion rate for employees with no disability (13.27%).

The inclusion rate for PWD (8.49%) and PWTD (9.51%) in Time Off Awards (11-20 hours), was below the inclusion rate for employees with no disability (10.51%).

The inclusion rate for PWD (4.89%) and PWTD (5.05%) in Time Off Awards (21-30 hours), was below the inclusion rate for employees with no disability (5.66%).

The inclusion rate for PWD (13.17%) in Time Off Awards (31-40 hours), was below the inclusion rate for employees with no disability (13.80%).

The inclusion rate for PWD (20.96%) and PWTD (22.96%) in Cash Awards (\$1000-\$1999), was below the inclusion rate for employees with no disability (25.12%).

The inclusion rate for PWD (12.16%) and PWTD (14.10%) in Cash Awards (\$2000-\$2999), was below the inclusion rate for employees with no disability (14.87%).

The inclusion rate for PWD (5.12%) and PWTD (5.49%) in Cash Awards (\$3000-\$3999), was below the inclusion rate for employees with no disability (10.15%).

The inclusion rate for PWD (0.35%) and PWTD (0.34%) in Cash Awards (\$4000-\$4999), was below the inclusion rate for employees with no disability (0.78%).

The inclusion rate for PWD (0.19%) and PWTD (0.19%) in Cash Awards (\$5000 or more), was below the inclusion rate for employees with no disability (0.62%).

- 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.
  - Pay Increases (PWD) Yes X No O
     Pay Increases (PWTD) Yes X No O

The inclusion rate for PWD (2.68%) and PWTD (2.99%) in Quality Step Increases (QSIs), was below the inclusion rate for employees with no disability (3.58%).

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.

Other Types of Recognition (PWD)	Yes O	No O	N/A X
• Other Types of Recognition (PWTD)	Yes O	No O	N/AX

# D. Promotions

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

a. <b>SES</b>		
i. Qualified Internal Applicants (PWD)	Yes O	No X
ii. Internal Selections (PWD)	Yes X	No O
b. Grade GS-15		
i. Qualified Internal Applicants (PWD)	Yes X	No O
ii. Internal Selections (PWD)	Yes X	No O

# c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Yes X	No O
ii. Internal Selections (PWD)	Yes X	No O
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Yes O	No X
ii. Internal Selections (PWD)	Yes X	No O

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

#### Internal Applicant vs. Qualified Internal Applicant vs. Internal Selections

GS-13 PWD:	32.86% - 32.95% - 21.16%
GS-14 PWD:	35.84% - 35.43% - 16.67%
GS-15 PWD:	44.47% - 42.77% - 15.38%
SES PWD:	60.14% - 61.42% - 34.48%

While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentage of the Qualified Applicant Pool, the Selection and the Promotions are the result of existing employees who applied to not only internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2021. This will also result in differences between internal / external selections and promotions rates.

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

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. <b>SES</b> i. Qualified Internal Applicants (PWTD)	Yes X	No O
ii. Internal Selections (PWTD)	Yes X	No O
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Yes X	No O
ii. Internal Selections (PWTD)	Yes X	No O
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Yes X	No O
ii. Internal Selections (PWTD)	Yes X	No O
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Yes O	No X
ii. Internal Selections (PWTD)	Yes X	No O

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

Internal Applicant vs. Qualified Internal Applicant vs. Internal Selections

GS-13 PWTD:	14.86% -	15.36% -	10.05%
GS-14 PWTD:	17.28% -	16.64% -	6.14%
GS-15 PWTD:	18.68% -	17.61% -	0.00%
SES PWTD:	23.31% -	23.22% -	13.79%

While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentage of the Qualified Applicant Pool, the Selection and the Promotions are the result of existing employees who applied to not only internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2021. This will also result in differences between internal / external selections and promotions rates.

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

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

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

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

#### **External Applicant vs. New Hires**

GS-13 PWD:	17.43% - 23.86%
GS-14 PWD:	21.07% - 19.33%
GS-15 PWD:	26.43% - 5.26%
SES PWD:	25.91% - 24.14%

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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.

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

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

# External Applicant vs. New Hires

GS-13 PWTD: 7.78% - 11.68% GS-14 PWTD: 9.67% - 10.08%

GS-15 PWTD: 13.21% - 5.26%

SES PWTD: 12.75% - 13.79%

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

# a. Executives

i. Qualified Internal Applicants (PWD)	Yes O	No X
ii. Internal Selections (PWD)	Yes X	No O
b. <b>Managers</b>		
i. Qualified Internal Applicants (PWD)	Yes X	No O
ii. Internal Selections (PWD)	Yes X	No O
c. <b>Supervisors</b>		
i. Qualified Internal Applicants (PWD)	Yes O	No X
ii. Internal Selections (PWD)	Yes X	No O

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

Supervisory positions	Internal Applicants	Qualified Applicants	Internal Promotions
Executives PWD:	58.63%	59.71%	31.43%
Managers PWD:	6.67%	0.00%	0.00%
Supervisors PWD:	66.67%	66.67%	0.00%

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6. Does your agency have a trigger involving <u>PWTD</u> 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 O	No X
ii. Internal Selections (PWD)	Yes X	No O
b. <b>Managers</b>		
i. Qualified Internal Applicants (PWTD)	Yes X	No O
ii. Internal Selections (PWD)	Yes X	No O
c. <b>Supervisors</b>		
i. Qualified Internal Applicants (PWTD)	Yes O	No X
ii. Internal Selections (PWD)	Yes X	No O

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

Supervisory positions	Internal Applicants	<b>Qualified Applicants</b>	Internal Promotions
Executives PWTD:	22.48%	22.30%	11.43%
Managers PWTD:	6.67%	0.00%	0.00%
Supervisors PWTD:	0.00%	0.00%	0.00%

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

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving **PWD** among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

a. New Hires for Executives (PWD)	Yes X	No O
b. New Hires for Managers (PWD)	Yes X	No O
c. New Hires for Supervisors (PWD)	Yes X	No O

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

Supervisory positions	Qualified External Applicants	New Hires
Executives PWD:	24.59%	18.42%
Managers PWD:	35.10%	31.82%
Supervisors PWD:	22.22%	0.00%

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8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

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

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

Supervisory Positions	Qualified External Applicants	New Hires
Executives PWTD:	12.52%	10.53%
Managers PWTD:	12.91%	0.00%
Supervisors PWTD:	0.00%	0.00%

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

# 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 O No X N/A O

In FY 2021, Treasury did not convert all eligible Schedule A employees to competitive appointments.

FINCEN did not timely convert an eligible Schedule A employee due to a management oversight while the employee was on extended leave.

IRS had 36 conversions and two non-conversions. One non-conversion was due to the employee's decline in performance; therefore, performance period was extended 90 days for observation. The other non-converted employee had extensive LWOP and awaiting guidance from the policy office to determine how the LWOP affects the conversion date.

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

The inclusion rate for PWD (7.19%) exceeded the inclusion rate of persons with no disability (1.19%) for voluntary separations. The inclusion rate for PWD (7.53%) exceeded the inclusion rate of persons with no disability (1.19%) for involuntary separations. 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 (PVVTD)	Yes X	No O
b. Involuntary Separations (PWTD)	Yes X	No O

The inclusion rate for PWTD (27.74%) exceeded the rate of persons with no disability (1.2%) for voluntary separations. The inclusion rate for PWTD (23.06%) exceeded the rate of persons with no disability (1.2%) for involuntary separations.

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

When evaluating the types of voluntary separations, we noted that 13.95 percent were due to retirement, 21.75 percent were transfers, 11.81 percent were resignations, and 25.09 percent were due to death. Of the voluntary separations, 36.61 percent were disabled veterans.

Based on the comments in the FY 2021 Treasury Employee Exit Survey, Treasury does not consider any of the voluntary separations showing a trigger. 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 a potential barrier.

During the period of October 1, 2020, through September 30, 2021, 168 permanent/seasonal PWD

responded to the Department's Exit Survey. The overall responses from PWD were similar to the

overall permanent/seasonal employee responses, in that, the factor most frequently cited as impacting a PWD's decision to leave was job stress (64.88%) followed by office morale (44.65%); responses for my ability to participate in decision making (45.83%) was an additional factor for PWD.

Additional responses specified that 73.21 percent of the respondents indicated their work experience was generally positive; 62.50 percent stated they would be interested in returning to work for Treasury; and 68.45 percent stated they would recommend Treasury as a good place to work.

B. Accessibility of Technology and Facilities

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

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

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

Information on how to file a complaint can be found at: <u>https://www.treasury.gov/about/organizational-structure/offices/Mgt/</u> 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: <u>https://home.treasury.gov/utility/accessibility/web-accessibility</u>.

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

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: <a href="https://home.treasury.gov/utility/accessibility/physical-accessibility">https://home.treasury.gov/utility/accessibility/physical-accessibility</a>.

Additionally, the following link (which is also located on the "Accessibility" page) provides information regarding how to file a complaint of discrimination: <u>https://home.treasury.gov/utility/accessibility/disability-resources</u>.

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 2021, the OCRD Audit Program, which includes Accessibility Reviews for Treasury bureau-occupied buildings, continued with an audit of DO. OCRD reviewed the accessibility of six DO buildings. A report listing the areas of noncompliance was forwarded to the appropriate officials to achieve full compliance.

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 2021 are:
BEP 10
DO 9
FinCEN 0 – No RA requests to process in FY 2021
FS 10
Mint 11
IRS 58
IRS-CC 20
OCC 10
The overall average for processing the Departments initial requests for reasonable accommodations is 18.47 business days. The Department recognizes the high average for IRS which is currently reviewing its methodology for calculating "average days for providing reasonable accommodations." This FY the IRS reduced their processing time from 89 to 58 days.
Treasury implemented a Treasury-wide reasonable accommodation tracking system that will eliminate the need to manually calculate processing timeframes. IRS is scheduled to transitioned to the system in FY 2022.

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 2021, 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 and procured a Treasury-wide PAS contract. This contract allows its bureaus to establish a blanket purchase agreement (BPA) against the Treasury-wide base contract. Training for PAS requests was provided to all managers, supervisors, and selected HR Professionals in FY 2019. Since 2019, PAS training has been included in the employee orientation of all newly-hired and -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 (19.69 %)?
  - Yes No X N/A O
- 2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?
  - Yes X No N/A O
- 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.

There was one complaint with a finding of discrimination without a hearing. The following corrective action was taken by the agency:

- monetary benefits issued to Complainant,
- mandatory training completed by management official, and
- posting notice of violation.
- 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 (13.53 %)?

Yes O	No X	N/A O
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2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Yes X No O N/A O

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.

Same	as	above
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# 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 O No X

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

Yes O No O N/A X

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

Trigger 1	Note: The following bureaus have identified t	triggers and initia	ted the barrier	analysis process fo	or PWD and
	PWTD: BEP, DO, FS, IRS, IRS-CC, and OCC				
	their deficiencies.				-
Barrier(s)					
Objective(s)					
Responsible Of	ficial(s)		Performance	e Standards Addr	ess the Plan?
			(Yes or No)		
Barrier Analys	is Process Completed?		Barrier(s) Ide	entified?	
(Yes or No)			(Yes or No)		
Sources of Dat		Sources	Identify Infor	mation Collected	
		Reviewed?			
		(Yes or No)			
Workforce Data	a Tables				
Complaint Data	(Trends)				
Grievance Data	(Trends)				
Findings from D	ecisions (e.g., EEO, Grievance, MSPB, Anti-				
Harassment Pr	ocesses)				
Climate Assess	ment Survey (e.g., FEVS)				
Exit Interview D	ata				
Focus Groups					
Interviews					
	ongress, EEOC, MSPB, GAO, OPM)				
Other (Please D	)escribe)			1	
Target Date	Planned Activities		Sufficient	Modified Date	Completion Date
(mm/dd/yyyy)			Staffing &	(mm/dd/yyyy)	(mm/dd/yyyy)
			Funding		
			(Yes or No)		
Fiscal Year	Accomplishments				

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

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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.

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

