

EEOC FORM
Bureau of Engraving and Printing
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

MD-715

Parts A Through E

Part A - Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
Department of the Treasury	Bureau of Engraving and Printing	13 th & C Streets SW	Washington	DC	20228	TRAI	11001

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	1742	19	1761

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

Agency Leadership	Name	Title
Head of Agency	Leonard Olijar	Director
Head of Agency Designee	Patricia (Marty) Greiner	Deputy Director (Chief Administrative Officer)

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

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Judith Diaz Myers	Acting Chief	0301	SES	202-874-2007	Judith.DiazMyers@bep.gov
Affirmative Employment Program Manager	Meltina Bynum	Diversity Outreach Coordinator	0260	GS-13	202-874-3604	meltina.bynum@bep.gov
Complaint Processing Program Manager	Willie Tucker	EEO/ADR Specialist	0260	GS-13	202-874-0099	willie.tucker@bep.gov

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Diversity & Inclusion Officer	Meltina Bynum	Diversity Outreach Coordinator	0260	GS-13	202-874-3604	meltina.bynum@bep.gov
Hispanic Program Manager (SEPM)	Meltina Bynum/ Paula Rathers	Diversity Outreach Coordinator/ EEO/ADR Specialist	0260	GS-13/ GS-12	202-874-3604/ 817-847-3950	meltina.bynum@bep.gov Paula.rathers@bep.gov
Women's Program Manager (SEPM)	Meltina Bynum/ Paula Rathers	Diversity Outreach Coordinator/ EEO/ADR Specialist	0260	GS-13/ GS-12	202-874-3604/ 817-847-3950	meltina.bynum@bep.gov Paula.rathers@bep.gov
Disability Program Manager (SEPM)	Willie Tucker	EEO/ADR Specialist	0260	GS-13	202-874-0099	willie.tucker@bep.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Willie Tucker	EEO/ADR Specialist	0260	GS-13	202-874-0099	willie.tucker@bep.gov
Reasonable Accommodation Program Manager	Rushelle Wilson	EEO/ADR Specialist	0260	GS-09	202-874-2437	Rushelle.wilson@bep.gov
Anti-Harassment Program Manager	Meltina Bynum	Diversity Outreach Coordinator	0260	GS-13	202-874-3604	Meltina.bynum@bep.gov
ADR Program Manager	Willie Tucker	EEO/ADR Specialist	0260	GS-13	202-874-0099	willie.tucker@bep.gov
Compliance Manager	Willie Tucker	EEO/ADR Specialist	0260	GS-13	202-874-0099	willie.tucker@bep.gov
Principal MD-715 Preparer	Meltina Bynum	Diversity Outreach Coordinator	0260	GS-13	202-874-3604	meltina.bynum@bep.gov
Other EEO Staff	Lynette Taylor	EEO/ADR Specialist	0260	GS-09	202-874-4571	Lynette.taylor@bep.gov

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)

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.

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

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

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

Part E – Executive Summary

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

Part E.1 - Executive Summary: Mission

Introduction/Mission

This report covers the period of October 1, 2018 through September 30, 2019, and outlines the Bureau of Engraving and Printing's (BEP/Bureau) Equal Employment Opportunity (EEO) program activities for Fiscal Year (FY) 2019. The report highlights the BEP's accomplishments during FY 2019 in obtaining and maintaining a model EEO Program by promoting the concepts of equal opportunity for all of our employees and applicants.

The Bureau of Engraving and Printing

BEP's mission is to develop and produce United States currency notes, trusted worldwide. Additionally, BEP designs and manufactures high quality security documents that deter counterfeiting and meet customer requirements for quality, quantity, and performance.

The BEP began printing currency in 1862. BEP operates based on authority conferred upon the Secretary of the Treasury by 31 U.S.C. 321(a) (4) to engrave and print currency and other security documents. Operations are financed by means of a revolving fund established in 1950 in accordance with Public Law 81-656. This fund is

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reimbursed through product sales for direct and indirect costs of operations, including administrative expenses.

In 1977, Public Law 95-81 authorized the BEP to include an amount sufficient to fund capital investment and to meet working capital requirements in the prices charged for products, and eliminating the need for appropriations from Congress.

BEP produces U.S. currency and other security documents issued and used by the Federal Government. Other activities at BEP include engraving plates and dies; manufacturing certain inks used to print security products; and purchasing materials, supplies, and equipment in accordance with requirements of customers. BEP also provides technical assistance and advice to other Federal agencies in the design and production of documents, which, because of their innate value or other characteristics, require counterfeit deterrence. BEP reviews cash destruction and unfit currency operations at Federal Reserve Banks and is responsible for the accountability and destruction of internally generated security waste products. As a free service to the public, BEP also processes claims for the redemption of mutilated paper currency.

Office of Equal Opportunity and Diversity Management (OEODM)

OEODM provides leadership, direction and guidance in carrying out BEP's Equal Employment Opportunity (EEO), Diversity and Civil Rights responsibilities. OEODM administers BEP's EEO and Diversity programs by developing policy, oversight, and technical guidance, including EEO complaint processing, diversity awareness, coordinating reasonable accommodations, and special emphasis programs.

EEO Program

BEP's core values are Integrity, Performance, Fairness and Respect. In support of those values, the MD-715 Working Group [OEODM and the Office of Human Resources (OHR)] met quarterly during FY 2019, and made progress toward establishing and maintaining a model EEO program in accordance with the six essential elements established by MD-715. BEP is committed to creating a working environment that allows its employees to be engaged in its programs and activities. An increase in job satisfaction is evident based on BEP employees' responses to the Federal Employee Viewpoint Survey (FEVS) questions Q5, Q7 and Q13, demonstrating how BEP employees enjoy the important work that they do and are willing to go the extra mile to get it done; and Q28 and Q8, demonstrating how BEP employees believe in the quality of work done by their work units and look for ways to do the job better.

BEP incorporates diversity management into its daily operations, which helps BEP align with MD-715, the policy guidance issued by the U.S. Equal Employment Opportunity Commission (EEOC) and Executive Order 13583 Establishing Coordinated Government-wide Initiative to promote Diversity and Inclusion in the Federal Workplace that Federal agencies follow in establishing and maintaining effective programs of equal employment opportunity.

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

N/A

Part E.3 - Executive Summary: Workforce Analyses

Workforce Demographics

BEP's workforce demographic trends over the period of FY 2009 to FY 2019¹ identified the areas where low participation rates have been of the most concern government-wide and at BEP: the distribution of Hispanic female and White female in law enforcement (TR) positions, the participation rates for Hispanics and Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD).

At the close of FY 2019, BEP had 1742 permanent employees, an increase of 12 (0.70 percent net change) employees from FY 2018.

Participation Rates in the Permanent Workforce

In support of BEP's mission, BEP utilizes the Relevant Civilian Labor Force (RCLF) tool, which is based off the National CLF, to provide a more realistic benchmark comparator based on the overall occupational composition of the BEP's total workforce. When calculating a weighted average for all available occupations in the Federal government, the RCLF calculates the expected labor force based solely on BEP's occupations. Historically, BEP has noted a male participation rate of 26.84 percent above their Civilian Labor Force (CLF) availability rate. This is largely due to the overall composition of the BEP workforce, which is 53.27 percent prevailing rate employees and 46.72 percent general schedule employees.

When assessing the overall gender participation rate of males vs females in BEP, the data showed little change since FY 2009 when participation rates were 75.05 percent for males and 24.95 percent for females, while in FY 2019, males represented 78.70 percent and females represented 21.30 percent. Overall, in FY 2019, males (78.70 percent) are participating above their CLF and RCLF availability rate (51.84 percent CLF vs. 64.71 percent RCLF). Whereas, female participation rate (21.30 percent) is below the CLF and RCLF availability rate (48.16 percent CLF vs 35.29 percent RCLF). The Ethnicity and Race Indicator (ERI) data in FY 2009 showed BEP's permanent workforce was 47.35 percent White and 52.67 percent non-White. In FY 2019, the participation rate for Whites increased to 49.43 percent of the workforce and non-Whites decreased to 50.17 percent. BEP noted a trend in the lower participation rate for non-Whites in the overall workforce. Specifically: Hispanics (8.50 percent compared to 9.27 percent RCLF), Asians (3.1 percent compared to 4.56 percent RCLF), and Two or More Races (0.40 percent compared to 0.54 percent RCLF) are participating at rates below their RCLF availability rates. Blacks (37.37 percent compared to 10.77 percent RCLF), American Indian/Alaska Natives (0.97 percent compared to 0.95 percent RCLF) and Native Hawaiian or Other Pacific Islanders (0.23 percent compared to 0.14 percent RCLF) are participating at rates greater than their RCLF availability rates.

¹ Enterprise Data Management System, Treasury's system of record, maintains employment data that covers a rolling period of 10 years. Beginning in FY 2019 data for trend analysis was available for FY 2009 through FY 2019.

BEP conducted a data analysis to determine BEP retirement eligibility and developed a plan to recruit, as well as, retain and develop current employees. The strategy used to conduct and analyze the data came from the Human Capital initiatives, systems of record for succession planning, workforce planning (including retirement eligibility, retention, and development by occupations), competency modeling, and leadership development competencies. This resulted in identifying the percentage of retirement eligible employees in the Mission Critical Occupations and the development of a four-year workforce plan for designated business units. The 2019 Workforce Planning (WFP) Initiative efforts resulted in 96% of the workforce undergoing a review of all positions, to include the determination of those eligible to retire. BEP developed and implemented a WFP model and tool to identify gaps, retention needs, and recruitment opportunities. All WFP was completed in FY 2019, with the exception of one office that was granted a waiver due to a newly appointed senior leader. Competencies were baselined in 2018 and currently BEP has teamed with Treasury's Enterprise Business Solutions (EBS), to determine competency use and migrate BEP's Competency Models into the integrated Talent Management (ITM) System during 2020.

Recruitment

As indicated in the Diversity and Inclusion Strategic Implementation Plan, BEP established an outreach and recruitment team. The primary objective of the team is to identify, plan, and implement changes that will improve or increase the ERI/gender participation rates within the workforce. Team initiatives are based on the Federal Agency Annual EEO Program Status Report (Management Directive-715) participation rates where employees' ERI and gender availability rates are lower than the Civilian Labor Force (CLF) and Relevant Civilian Labor Force (RCLF). The team is comprised of the OHR Outreach Coordinator and OEODM's Diversity Coordinator, with support from Associate Directors and BEP subject matter experts. BEP has successfully increased our outreach efforts and attendance at job fairs.

During FY 2019, the team developed an Outreach and Recruitment Plan, which focuses on employing initiatives that are based on the results of BEP participation rates that are below the CLF and the RCLF and to review its employment practices to eliminate barriers that prevent minorities from having a disadvantage in the Federal hiring process. As a result of the Outreach and Recruitment Plan, BEP attended four outreach and recruitment events in FY 2019 where the job fairs yielded a large number of veterans, people with disabilities and minorities. The turnout exceeded the job fair expectations. BEP received a steady flow of attendees and collected over 50 resumes. Attendees expressed a great deal of interest with the occupations that exist within BEP. As a result of creating the outreach and recruitment team, and advance planning for job fairs, the BEP table was well staffed with individuals and pamphlets about BEP that provided on-the-spot information pertinent to recruitment. BEP interviewed potential job applicants and made tentative offers.

In addition, BEP conducted outreach efforts to ten Minority Serving Institutions, and shared information about BEP and available occupations within our workforce through advertisement in their school newspapers.

Barrier Analysis

To address the underrepresentation of Hispanics within the workforce, BEP conducted a detailed barrier analysis in one of BEP's major occupation series, 0083 Police Officers. Based on the analysis, it was evident that a barrier exists in the outreach and recruitment of Hispanic and White women. In addition, OEODM worked closely with OHR and the hiring managers in the Police Operations Division to gather information on the hiring process, job qualifications, vacancy announcement, application flow data and application process. BEP subsequently developed recruitment and outreach strategies that targeted Hispanic and White females for employment opportunities. Due to the increase of hiring events in FY 2019, BEP was able to hire one male and two females in the occupation series 0083, Police Officer. Although, they were hired, their ERI will not be available until they complete several onboarding requirements for Police Officers.

BEP also noted that Hispanic males are participating at rates below their Workforce Availability Rate (WAR) of 5.38 percent in grades GS-12 through SES and Hispanic females are participating below their workforce availability rate of 1.83 percent in grades GS-13 and GS-15.

BEP's next step is to conduct an analysis of career tracks that lead to SES positions within BEP, evaluate the existing policies and procedures for hiring and advancement opportunities in the major critical occupation/mission critical occupations, (e.g. promotions) and continue to review historical data for trends.

In addition to reviewing BEP's GS workforce to determine which occupations lead to GS-12 and above, BEP will also conduct an analysis to determine what occupations lead to leadership positions within the workforce, as well as, what constitutes the feeder pool and leadership positions within our workforce.

Disability Employment Program

BEP's OEODM and OHR collaboratively manage a Schedule A data sheet to help track, maintain, identify and refer qualified Schedule A applicants. BEP also partners with the Wounded Warrior and the Workforce Recruitment Program (WRP) coordinators in an effort to identify qualified applicants with disabilities, including individuals with targeted disabilities. Currently, BEP has a Schedule A resume repository and is procuring access to an automated government-wide Schedule A repository in FY 2020.

BEP has established a working relationship with the Computer/Electronic Accommodation Program (CAP) to secure devices frequently used by PWD and PWTD. BEP maintains contact with interpreter service providers and partners with the WRP to identify qualified applicants with disabilities and targeted disabilities.

BEP continued using centralized funding to ensure reasonable accommodation training and providing the necessary equipment for reasonable accommodation requests. During the reporting period, there were 23 reasonable accommodation requests and the average timeframe for processing the requests was nine days. This average was well within BEP's goal of 20 business days.

Moreover, all new employees were briefed on reasonable accommodation during the new employee orientation process. Reasonable accommodation training was provided for 304 supervisors and managers in FY 2019.

Hiring Goal of PWD and PWTD

BEP continues to exceed the Federal government goal of 12 percent participation rate for PWD (16.15 percent). In addition, BEP's was able to maintain its objective of two percent hiring goal for PWTD (2.13 percent).

In FY 2019, OHR conducted workforce planning and executive succession planning to include analysis of designated workforce, leadership positions, program offices, and occupations to include strategies for employee development, succession programs, and organizational assessments that benefit people with and without disabilities.

The BEP EEO staff also partnered with OHR to outline assigned responsibilities and procedures for the administration of the BEP special hiring and outreach program. BEP's EEO staff developed a detailed presentation on recruitment and outreach, which included templates and provided instructions on how to structure recruitment and outreach efforts.

In FY 2019, BEP had an overall 30 percent military veteran baseline, a 13 percent disabled veteran's baseline, and a nine percent baseline of 30 percent or more disabled veterans.

Exit Survey

All employees that separate from BEP are asked to complete an Exit Survey. The results of this survey are used to identify, and if possible, address factors impacting an employee's decision to leave. In FY 2019, there were 98 voluntary and ten involuntary separations of which 80 were males and 28 were females. Out of 108 separations, 33 employees completed the exit survey, 17 respondents indicated that they left due to retirement, seven transferred to another Federal Agency, one accepted a position with a state/local government entity, five received promotions in another Federal Agency, and three resigned for reasons not specified on the Exit Survey. Sixty-four percent of the respondents are leaving in less than five years; whereas, 79% respondents indicated their work experience as generally positive and 76% respondents recommended Treasury as a good place to work. With regard to ERI, 31 (94 percent) respondents were non-Hispanics; whereas, two (6.06 percent) Hispanics completed the exit survey.

In FY 2019, 23 permanent PWD separated from BEP. Of those, 20 were voluntary and three were involuntary. Eight employees separated due to retirement and six transferred to another Federal agency; whereas, four employees resigned, one was removed and two were discharged. Two employee separations were due to death.

Part E.4 - Executive Summary: Accomplishments

- Partnered with Treasury Executive Institute through program participation and developing training curriculum.

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- Attended multiple job fairs, assembled recruitment teams that complement target audiences, and developed an annual Outreach and Recruitment plan.
- Conducted outreach efforts to ten Minority Serving Institutions (MSI) and provided them with a newsletter and flier about BEP and how to apply for jobs on USAJOBS.
- Selected four new interns to participate in the Pathways Program.
- Partnered and trained on Civil Treatment in Workplace for Leaders.
- Provided on-line training to 1668 employees, conducted in-person diversity training for 313 production employees and supervisors across all three shifts at both manufacturing locations.
- Provided EEO and harassment/hostile work environment training to BEP employees.
- Delivered individualized EEO/Diversity and workforce demographic briefings to Senior Executives and their management teams to highlight their successes and target future recruitment activities.
- Exceeded the 2% hiring goal for PWTD and the 12% hiring goal for PWD by creating awareness around what constitutes a disability.
- Created an OEODM website that includes information on special observances.
- Continued the Diversity and Inclusion (D&I) Council, composed of 30 members (25 employees and five Senior Leaders)
 - Diversity among members includes positions, locations (both facilities), gender, race, individuals with disabilities, national origin and a member of the LGBT community.
 - Conducted a voice-of-the-employee survey across BEP to identify the top D&I educational and awareness needs for BEP employees.
 - Designed a three to five year D&I educational strategy.
 - Presented workshops and training on Unconscious Bias, LGBTQ, Understanding Autism, First Generational Professionals and Understanding and Communicating with a Multigenerational Workforce.
 - Hosted an annual D&I Month.
 - Designed and delivered a “Who Wants to be a Diversity and Inclusion Millionaire” game: a fun and engaging educational activity to enhance employee cultural awareness.
 - Published quarterly educational articles.
 - Conducted presentations and/or employee panels on: Generational Differences, Unconscious Bias, First Generation Professionals, Sexual Identity and Gender Identity language, inclusive and respectful disability language guidance. Created a D&I Council website.
- Enhanced mentoring programs for employees at all levels with an emphasis on aspiring executive level employees. Held mentoring program kick-off session on August 20, 2019, to announce the program and implement the application process.

- All SES current and new appointments completed their unconscious bias or similar training prior to serving on an ERB.
- Implemented the following strategies to recruit, employ, retain, and advance Disabled Veterans with an added emphasis on Veterans with a compensable service-connected disability of 30% or more:
 - Prior to advertising vacancy announcements, collaborate with OHR to be proactive in considering candidates in the ten-point Veterans' status;
 - Continue to encourage new and current BEP employees to complete Standard Form 256, Self-Identification of Disability; and
 - Educate and promote awareness to BEP's Veterans and Disabled Veterans on available developmental opportunities within BEP utilizing intranet, learning management systems, social networks, and other effective outreach strategies.

Part E.5 - Executive Summary: Planned Activities

During FY 2020 - 2024, OEODM and OHR will partner to develop and implement the following practices related to SES recruitment:

- Update internal procedures to require the appropriate management official to review the statistics relating to the diversity of the internal pool prior to recruiting internally.
- Post SES vacancy announcements for a minimum of 30 calendar days to allow sufficient time to recruit widely (shorter periods should be on an exception only basis, when there is a demonstrated urgent need).
- Reevaluate where BEP currently sends vacancy announcements to identify the best opportunity to reach those groups with lower than expected application rates, as well as, overall workforce participation in comparison to their Occupational Civilian Labor Force (OCLF) benchmarks.
- Ensure Executive Review Board (ERB) panels are diverse as to gender, race, and ethnicity, whenever possible.

Additional planned activities:

- Complete contract to onboard interns from programs such as, INROADs, Hispanic Association of Colleges and Universities and the Washington Center for Internships and bring on two interns from MSIs.
- Deliver Civil Treatment Workforce training for leaders
- Release an email to all managers who have approved vacancies regarding Workforce Recruitment Plan (WRP) and Monster Vet hiring to increase employment of Veterans and individual with disabilities.
- Conduct informational sessions with prospective veteran and disabled veteran applicants to promote BEP's career opportunities.
- Partner with BEP stakeholders to educate Veterans about the organization's mission, provide Veterans with techniques and information that will enable them

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to write an effective resume for Federal employment, provide practical demonstrations on how to better navigate through the Federal hiring process; and provide tips on how to more effectively track the application progress via informational sessions.

- Determine appropriate monitoring and results measurement to assess job fair attendance. Evaluate BEP's mentoring program through the use of a survey. Capture the number of employees, SES, Managers and Supervisors and collect demographic data of mentoring participants (race, national origin, veterans, people with disabilities, etc.).
- Research, develop and implement a succession plan for mission critical occupations and/or SES positions.

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

I, Judith Diaz Myers, Acting Chief, Office of Equal Opportunity and Diversity Management, 301, SES am the

Principal EEO
Director/Official
for Bureau of Engraving and Printing

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

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, Sex or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program Status
Report is in compliance with EEO MD-715.

Judith Diaz Myers, Acting Chief, Office of Equal Opportunity and
Diversity Management, 301, SES

Date

Signature of Agency Head or Agency Head Designee

Leonard R. Olijar, Director, Bureau of Engraving and Printing

Date

MD-715 - PART G
Agency Self-Assessment Checklist

The Part G Self-Assessment Checklist is a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F

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of MD-715. This self-assessment permits EEO Directors to recognize, and to highlight for their senior staff, deficiencies in their EEO program that the agency must address to comply with MD-715's requirements. Nothing in Part G prevents agencies from establishing additional practices that exceed the requirements set forth in this checklist.

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





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

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

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

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Agency Self-Assessment Checklist

 Compliance Indicator  Measures	A.1 – The agency issues an effective, up-to-date EEO policy statement.	Measure Met? (Yes/No/NA)	Comments
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	10/15/2018
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	
 Compliance Indicator  Measures	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments
A.2.a	Does the agency disseminate the following policies and procedures to all employees:	Yes	
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:	Yes	



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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	
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	https://www.moneyfactory.gov/eeoadr.html
A.2.c	Does the agency inform its employees about the following topics:		
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	It is posted on both the internal and external websites, common areas/breakrooms and informational posters are posted throughout the Agency and given out during new employee orientation.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	It is posted on both the internal and external websites. BEP conducts an annual ADR week during the month of June, which highlights the importance of ADR and conflict resolution. Additionally, BEP conducts quarterly ADR informational tables.
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	It is posted on both the internal and external websites, common areas/breakrooms and informational posters are posted throughout the Agency and given out during new employee orientation.
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.	Yes	It is posted on both the internal and external websites, common areas/breakrooms and informational posters are posted throughout the Agency and given out during new employee orientation.
A.2.c.5	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	Internal websites, policies, new employee orientation





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 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator
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	Performance awards (mandatory D&I and supervisory performance goals); monetary/non-monetary 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	
Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.			
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)]	Yes	
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.	No	
B.1.a.2	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	

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B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	05/07/2019
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	N/A	Treasury's Office of Civil Rights and Diversity (OCD) is responsible for all aspects of the formal complaint process.
B.2.d	Is the EEO Director responsible for overseeing the timely issuing final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	N/A	Treasury's OCD is responsible for all aspects of the formal complaint process.
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes	
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	NA	BEP does not have any subordinate level components





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 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	BEP's Strategic Plan, Core Values: Equitable treatment of all employees, free from bias, dishonesty, or injustice.
 Compliance Indicator  Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
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 possible program deficiencies? [see MD-715, II(D)]	Yes	
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes	
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	Yes	
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	





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

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 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments New Indicator
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 C.F.R. § 1614.102(d)(3)]	Yes	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes	
B.5.a.5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes	
 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments New Indicator
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes	
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes	
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes	
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Yes	

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Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
C.1.a	C.1 – The agency conducts regular internal audits of its component and field offices. Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	Yes	Annually after the submission of the bureau MD-715 reports, OEODM evaluates their submissions and provides feedback on the status of deficiencies, implementation of planned activities to eliminate deficiencies and recommends additional measures required to eliminate noted deficiencies. Additionally, OEODM partners with OHR to conduct quarterly audits of the Bureau's programs. The following was the schedule for FY 2019: October 1, 2018, January 14, 2019, April 1, 2019, July 1, 2019
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 after the submission of the bureau MD-715 reports, OEODM evaluates their submissions and provides feedback on the status of barrier analysis, recommends next steps and additional analysis required. When needed OEODM meets with key stakeholders to review data and explain measures needed to conduct a barrier analysis in the upcoming FY.
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	
 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments New Indicator

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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	
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	



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C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	
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 <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	Yes	
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	Cell Blank
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)]	Yes	Cell Blank
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	Cell Blank



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C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	Yes	
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	https://www.moneyfactory.gov/eeoadr.html



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C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	Yes	
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments New Indicator





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C.3.a	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	
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes	
C.3.b.2	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	
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes	
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Yes	
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes	
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes	
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes	
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	
 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments

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C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
C.4.d	Does the HR office timely provide the EEO office have timely access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes	
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes	
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes	
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes	
 Compliance Indicator  Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)	Yes	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	During FY 2019, there were no findings of discrimination



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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 about the discriminatory conduct? [see MD-715, II(C)]	Yes	
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	Quarterly
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	
Essential Element D: PROACTIVE PREVENTION This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.			
 Compliance Indicator  Measures	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments



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D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
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D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes	
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes	
 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments New Indicator
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	



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D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.	Yes	I-Complaints for complaint data, BEP exit survey results, Monster Analytics for Workforce/Applicant Flow Data, SEPM's and Employee Resource Groups, RA processing, Outside Reports, EEOC annual reports and special emphasis reports
 Compliance Indicator  Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments New Indicator
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes	
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes	





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D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes	
 Compliance Indicator  Measures	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities	Measure Met? (Yes/No/NA)	Comments New Indicator
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://www.moneyfactory.gov/eeoadr.html
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	Cell Blank
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	Cell Blank
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	Cell Blank



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Essential Element E: EFFICIENCY This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.			
 Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments
 Measures			
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
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)?	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
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.	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process
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?	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
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)?	N/A	
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)?	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
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)?	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.



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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.	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised 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(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.	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
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)]	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
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? EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
 Compliance Indicator  Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments



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E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	
 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
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 of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes	
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes	





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E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes	
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes	
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  Measures	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	Complaints (complaint trends), findings, RA processing, exit survey data, FEVS results and EEOC annual reports. Workforce data Development of Workforce Analytics, Treasury’s automated data analysis tool.
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	Evaluate all best practices provided from Treasury’s Human Capital Advisory Council and EEO Officer’s meeting and see if any would be applicable to BEP.
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	

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Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
F.1.a	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements. 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	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	

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 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments Indicator moved from E-III Revised
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes	
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes	
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	N/A	Treasury's OCRD is responsible for all aspects of the formal complaint process.
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes	This is posted to the Treasury website by OCRD at https://www.treasury.gov/No-Fear-Act/Pages/default.aspx

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F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes	This is posted to the Treasury website by OCRD at https://www.treasury.gov/No-Fear-Act/Pages/default.aspx https://www.moneyfactory.gov/eeoadr.html
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MD-715 – Part I

Agency EEO Plan to Eliminate Identified Barrier

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A6, A7 & A8	Hispanic females are participating at rate 0.52% below their Occupational Civilian Labor Force (OCLF) availability rate (2.20%) in the Police Officer (0083) occupational series. White females are also participating at a rate of 2.59% below their OCLF availability rate (8.50%).

EEO Group(s) Affected by Trigger

EEO Group	Yes/No
All Men	
All Women	
Hispanic or Latino Males	
Hispanic or Latino Females	Yes
White Males	
White Females	Yes
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 Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	BEP conducted a trend analysis of the A7 and supplemental A8S to track applicants and hires for the major occupations by race/ethnicity and gender for the occupation series 0083 (Police Officer) to compare participation rate for Hispanic females and White females to the OCLF availability rate. The analysis showed that between FY 2013 to FY 2019 Hispanic females and White females have been

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		applying at a lower rate than the OCLF availability rate.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	Yes	<p>Conducted interviews with hiring managers and members of the Police Operations Division to discuss the hiring process (outreach and recruitment), job qualifications, vacancy announcement, application flow data and application process for occupation series (0083).</p> <p>During the interview, hiring managers indicated that for several years there were no hires within police officer positions. Even though there were vacant positions in the occupation 0083, hiring managers were not able to hire due to limited funding and in conjunction with right-sizing the workforce, which dictated a targeted amount of officers to sufficiently perform the duties and responsibility for BEP. In addition, hiring is focused on utilizing a variety of Veteran Hiring authorities.</p> <p>Past outreach and recruitment efforts by the Police Operations Division, focused on the field of study (law enforcement, criminal justice, political science, military police, veterans and corrections).</p> <p>During the interview we discussed the possibility of targeted recruitment for Hispanic females in the Fort Worth, Texas demographic areas of New Mexico, Arizona and Texas, which has a large concentration of Hispanics for future outreach efforts. The Police Operations Division was not aware of the lower than expected participation rate of Hispanic females in the Police Officer occupation series or the need to focus outreach and recruitment towards Hispanic females and/or White females.</p>
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC and OPM
Other (Please Describe)	No	

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s)

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Description of Policy, Procedure, or Practice
BEP's process of traditionally posting vacancies to USAJOBS with no targeted recruitment and outreach to Hispanic and White Women.

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Develop a recruitment and outreach strategy that targets female for employment opportunities in the Police Officer occupation.	10/03/2016	09/29/2019	Yes		09/05/2019

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Chief of Office of Equal Opportunity and Diversity Management	Judith Diaz Myers	Yes
Chief of Office of Human Resources	Karnelis Godette	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Establish an effective repository for resumes.		09/30/2017
09/30/2018	Establish a relationship with other Federal agencies and Minority Serving Institutions (Hispanic Serving Institutes) to gain insight on outreach efforts for Hispanic females and White females in law enforcement.	09/30/2019	09/30/2019
09/30/2019	Attend at least four outreach and recruitment events.		10/2018 04/01/2019 09/18/2019 09/19/2019 09/27/2019

Report of Accomplishments

Fiscal Year	Accomplishments
2018	As a result of our participation at an outreach and recruitment event we had two Hispanic females and two White females applied for the occupation series 0083.
2019	As a result of our participation at an outreach and recruitment event we were able to hire one male and two females in the occupation series 0083.
Cell Blank	Cell Blank
Cell Blank	Cell Blank
Cell Blank	Cell Blank

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MD-715 – Part I

Agency EEO Plan to Eliminate Identified Barrier

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A1, A4-1, and A14S	Hispanic males are participating below their workforce availability rate of 5.38 percent in general schedule (GS) grades 12 through Senior Executive Service (SES) and Hispanic females are participating below their workforce availability rate of 1.83 percent in GS 13 and 15 grades.

EEO Group(s) Affected by Trigger

EEO Group	Yes/No
All Men	
All Women	
Hispanic or Latino Males	Yes
Hispanic or Latino Females	Yes
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 Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	BEP reviewed Tables A1, A4-1 and A14S to track workforce participation, the participation rate in GS grades, and separation based on occupations. The analysis showed in FY 2016, Hispanics were below their workforce availability rate (WAR) (4.78 percent) in GS 13, 15 and SES grades. In FY 2017 and 2018, Hispanic males were below their workforce availability in GS 12 through the Senior Executive Service grades. From FY 2016 through FY 2018, Hispanic females are above the WAR at the GS 12, 14 and SES grades; however, Hispanic females have a lower than

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		expected participation rate from GS 13 and 15 grades.
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice

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Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Chief of Office of Equal Opportunity and Diversity Management	Judith Diaz Myers	Yes
Chief of Office of Human Resources	Karnelis Godette	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

Report of Accomplishments

Fiscal Year	Accomplishments

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.

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.

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

a. Cluster GS-1 to GS-10 (PWD)	Yes 0	No X
b. Cluster GS-11 to SES (PWD)	Yes 0	No X

Not applicable for the general schedule.

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

a. Cluster GS-1 to GS-10 (PWTD)	Yes X	No 0
b. Cluster GS-11 to SES (PWTD)	Yes 0	No X

Cluster GS-1 to GS-10 BEP is (0.92) 1.08% below from meeting the goal of 2%.

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

BEP communicated the numerical goals to hiring managers and recruiters through: internal Bureau partnership meetings, internal Bureau communications, executive briefings, recruitments events, and an SF-256 re-survey program.

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.

PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

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

Yes X No 0

Not applicable.

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

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Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	20		2	Karnelis Godette, Chief, Office of Human Resources (Karnelis.Godette@bep.gov)
Answering questions from the public about hiring authorities that take disability into account	11		15	Karnelis Godette, Chief, Office of Human Resources (Karnelis.Godette@bep.gov)
Processing reasonable accommodation requests from applicants and employees			4	Judith Diaz Myers, Acting Chief, Office of Equal Employment and Diversity Management
Section 508 Compliance			2	Sharilyn Cook, Manager, Office of Enterprise Solutions
Architectural Barriers Act Compliance			1	Daniel Carver, Chief, Office of Facilities Support
Special Emphasis Program for PWD and PWTD			4	Judith Diaz Myers, Acting Chief, Office of Equal Employment and Diversity Management

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

Yes X No 0

During FY 2019, disability staff attended Equal Employment Opportunity Commission (EEOC) Disability Program Manager training and National Employment Law Institute training. The entire disability program staff received reasonable accommodation training.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Yes X No 0

Not applicable.

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.

BEP's Office of Equal Employment and Diversity Management (OEODM) and Office of Human Resources (OHR) collaboratively manage a Schedule A data sheet to help track, maintain, and identify qualified Schedule A applications that are received. BEP partners with the Wounded Warrior and the Workforce Recruitment Program (WRP) in an effort to identify qualified applicants with disabilities,

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including individuals with targeted disabilities. BEP developed a Schedule A resume repository and gained access to an automated government-wide Schedule A repository in fiscal year 2019. BEP partnered with the Department of the Treasury and Monster Government Services to create a customized job search tool that provides veterans services such as, a federal resume tutorial, a military skills translator, and a resume to job match capability. BEP has established an outreach and recruitment team as indicated within the Diversity and Inclusion Strategic Implementation Plan. The primary objective of the team is to identify, plan, and implement changes that will improve or increase the Ethnic and Race Indicator (ERI)/gender participation rates within the workforce.

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

Schedule A is available for use along with Veteran Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with service-connected disability rating of 30% or more. OHR implemented a mandatory Strategic Consult with all hiring officials prior to recruitment. During this consult, OHR and hiring officials discuss hiring flexibilities, including Schedule A and Veterans appointments.

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

When individuals apply utilizing the Schedule A hiring authority, the servicing HR Specialist reviews and determines if the applicant meets qualifications/position requirements and that they have provided the required proof of disability. Applicants deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures, including the application of veterans' preference (where applicable). Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (e.g. Merit Promotion, Non-Competitive, VRA, etc.). Alternatively, when individuals submit their resumes directly to BEP or the Bureau Special Placement Program Coordinator (SPPC) for vacant positions, the SPPC refers the resumes to the designated servicing HR Specialist. The HR Specialist then reviews the resumes to determine qualifications and eligibility. 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.

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

Yes X No 0 N/A 0

OHR partnered with the agency's Veteran's Employment Resource Group (VERG) to host a lunch and learn on Veteran Hiring Authorities in December 2017. Additionally, OHR mandates a Strategic Consult for all hiring officials prior to recruitment, whereby hiring flexibilities and authorities (including Schedule A and Veterans appointments) are encouraged and discussed. As an on-going effort, OEODM has future plans in FY 2020 to train, advertise and promote hiring authorities and information about converting eligible Schedule A employees after their two-year probationary period.

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.

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BEP has established a working relationship with the Computer/Electronic Accommodation Program (CAP) to secure devices frequently used by PWD and PWTD. BEP also maintains contact with interpreter service providers and partners with the Wounded Warrior and the Workforce Recruitment Program (WRP) to be able to identify qualified applicants with disabilities and targeted 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.

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

Not applicable.

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

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

FY 2019 Hires Qualified vs. Hires Qualified vs. Hires

0083 (5) Hires: PWD: not applicable PWTD: 1.40% - 0.00%

2210 (7) Hires: PWD: 9.52% - 0.00% PWTD: 4.01% - 0.00%

Police Officers (0083) and Information Technology Management (2210), both have a low application rate for PWTD among the new hires for the mission critical occupations. The occupation series 2210 also has a low application rate for PWD among the new hires for the mission critical occupations. Based on FY 2018 data, the application rates for Police and Information Technology Management were not an area of concern when they had low hires. A determination cannot be made if there is an actual trigger; due to limited hiring. BEP will conduct an annual self-assessment to monitor and identify any areas of concern.

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

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

Not applicable.

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

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

Not applicable.

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

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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.

BEP offers career development opportunities to all employees via non-competitive details and temporary promotions. The career development opportunities are marketed through internal communications and external sources. BEP designed and implemented an upward mobility program for all eligible employees (including PWD and PWTD) in FY 2018; the program is designed for current employees who are in a position or an occupational series that has limited or no upward career mobility. The program just completed its first year of implementation and it will be monitored over the next two years to determine the effectiveness and identify any areas of improvements.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

Below is a list of the various career development programs the Bureau provides to its employees:

New Leaders Program (NLP). The NLP targets GS 7-11 employees (or equivalent) and is designed to develop future public service leaders. The program includes leadership self-assessments, experiential learning, and individual development opportunities integrated into a competency-based learning approach.

Executive Leadership Program (ELP). The ELP is designed for GS 12-13 (or equivalent) employees seeking to support their organization in meeting its mission and goals. The program focuses specifically on the competency of "leading people" through developmental activities and experiences.

Executive Potential Program (EPP). The EPP is a competency-based leadership program that prepares high-potential GS 14-15 employees (or equivalent) to lead effectively at senior levels in the federal government. The curriculum is focused on "leading change" and transforming senior managers into change leaders.

Career Development (CADE) Program. The CADE Program provides upward mobility via defined career training and opportunities that allow the selection and training of disabled veterans (and other employees) GS-11 (or equivalent) and below, whose positions offer limited promotion potential, for placement into positions in other occupational series for which they would not otherwise be qualified.

Electro-Machinist & Mechanical-Machinist Trainee Program. This program is advertised as a four-year trainee program to journeyman Electro-Machinists. This position is located in the Electro-Machine Shop, Office of Security Printing. The incumbent participates in a four-year training program with the Bureau of Engraving and Printing including formal, laboratory, and on-the-job training. The incumbent is normally assigned to maintain/support all currency printing/processing equipment, including temporary and permanent modifications and installations required to maintain production goals. The incumbent works with journeymen and other peers, while participating in on-the-job training.

In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2019 MD-715 report, which is due on February 28, 2020.]

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Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Training Programs	0	0	0	0	0	0
Detail Programs	3	1	0	0	0	0
Other Career Development Programs	NA	NA				

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

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

Not applicable.

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

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

Not applicable.

C. AWARDS

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

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

The inclusion rate for PWD (4.51%) and PWTD (2.63%) was below the inclusion rate for employees with no disability (8.06%) for time-off awards between 1 - 10 hours.

The inclusion rate for PWTD (0.00%) was below the inclusion rate for employees with no disability (0.69%) for time-off awards of between 21 - 30 hours.

The inclusion rate for PWD (1.39%) and PWTD (0.00%) was below the inclusion rate for employees with no disability (2.08%) for time-off awards of between 31 - 40 hours.

The inclusion rate for PWD (10.42%) and PWTD (5.26%) in cash awards \$500 or less, was below the inclusion rate for employees with no disability (17.79%).

The inclusion rate for PWD (5.90%) and PWTD (2.63%) in cash awards \$501 - \$999 was below the inclusion rate for employees with no disability (8.41%).

The inclusion rate for PWD (51.39%) and PWTD (52.63%) in cash awards \$1000 - \$1999 was below the inclusion rate for employees with no disability (68.94%).

The inclusion rate for PWTD (0.00%) in cash awards \$2000 - \$2999 was below the inclusion rate for employees with no disability (2.85%).

The inclusion rate for PWD (2.08%) and PWTD (2.63%) in cash awards \$3000 - \$3999, was below the inclusion rate for employees with no disability (3.47%).

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The inclusion rate for PWD (0.00%) and PWTD (0.00%) in cash awards \$5000 or greater, was below the inclusion rate for employees with no disability (0.07%).

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

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

The inclusion rate for PWTD (0.00%) in quality step increases fell below the inclusion rate for employees with no disability (0.49%).

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

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

Not applicable.

D. PROMOTIONS

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

a. SES

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

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

Applicants/Qualified/Promotions
GS-14 – PWD: 18.18% - 20.00% - 16.67%

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.

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

Applicants/Qualified/Promotions GS-14 – PWTD: 18.18% - 20.00% - 0.00%
--

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

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

Qualified Applicants/Hires GS-15 – PWD: 6.72% - 0.00%
--

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

Qualified Applicants/Hires GS-15 - PWTD: 2.99% - 0.00% GS-13 - PWTD: 6.70% - 0.00%
--

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

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

Qualified Applicants/Promotions Managers – PWD: 33.33% - 16.67%
--

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

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

Qualified Applicants/Promotions Managers – PWTD: 33.33% - 0.00%
--

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.
- | | | |
|------------------------------------|-------|------|
| a. New Hires for Executives (PWD) | Yes X | No 0 |
| b. New Hires for Managers (PWD) | Yes 0 | No X |
| c. New Hires for Supervisors (PWD) | Yes 0 | No X |

Qualified Applicants/Hires Executives – PWD: 5.66% - 0.00%

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.

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

New Hires for Supervisors (PWTD)	Yes 0	No X	Qualified Applicants/Hires
Executives – PWTD: 2.52% - 0.00%			

Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace personal assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Yes 0 No X N/A 0

One employee was eligible to be converted in FY 2019, and was not converted due to a misunderstanding the employee had about the conversion. The conversion is pending with OHR.

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

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

Number of Perm Employees:

NO DIS – 1431 PWD – 285

VOL SEP Inclusion Rate:

NO DIS – 5.38% (77) PWD – 7.01% (20)

InVOL Sep Inclusion Rate:

NO DIS – 0.34% (5) PWD – 1.05% (3)

The inclusion rate for PWD (7.01%) exceeded the inclusion rate of persons with no disability (5.38%) for voluntary separations.

The inclusion rate for PWD (1.05%) exceeded the inclusion rate of persons with no disability (0.34%) 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.

c. Voluntary Separations (PWTD)	Yes X	No 0
d. Involuntary Separations (PWTD)	Yes 0	No X

Number of Perm Employees:

NO DIS – 1,431 PWTD – 38

VOL SEP Inclusion Rate:

NO DIS – 5.38% (77) PWTD – 10.52% (4)

InVOL Sep Inclusion Rate:

NO DIS – 0.34% (5) PWTD – 0.00% (0)

The inclusion rate for PWTD (10.52%) is below the inclusion rate of persons with no disability (5.38%) for voluntary separations.

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

23 permanent PWD separated from BEP in FY 2019. Of those, 20 were voluntary and three were involuntary. Eight employees separated due to retirement and six transferred to another Federal agency; whereas, four employees resigned, one was removed and two were discharged. Two employee separations was due to death.

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.

<https://www.moneyfactory.gov/eeoadr.html>

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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.

<https://www.moneyfactory.gov/accessibilitystatement.html>

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.

BEP has improved the accessibility of the parking program by ensuring an adequate number of accessible spaces are available to employees for on premise parking. BEP has also worked to install several accessible doors, as well as an accessible ramp for entering and exiting the facility. During FY 2019, we continued to use closed captioning for our lunch and learns and provided hearing impaired employees with the use of an iPad to video-chat with an interpreter during meetings. BEP is working to procure and install accessible doors for disabled employees in the fitness center.

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).

The average time frame for processing initial reasonable accommodation requests during the reporting period was nine days.

1. 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 BEP continued using centralized funding to ensure reasonable accommodation training and providing the necessary equipment for reasonable accommodation requests. During the reporting period, there were 23 reasonable accommodation requests. Additionally, reasonable accommodation supervisory training was deployed in FY 2019, and all new employees were briefed on reasonable accommodation during the new employee orientation process.

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.

During the FY 2018 reporting period, the BEP developed a Personal Assistance Services (PAS) policy and procedures, which can be found on BEP's internal and external websites. Additionally, internal communications to the workforce were released to inform employees of how they can electronically access the Bureau's current policies and procedures. In FY 2019, internal communications went out to

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the workforce on the proper procedures for when they encounter an individual with a service animal. PAS training is scheduled for managers and supervisors in FY 2020.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?
Yes ☒ No ☐ N/A ☐
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?
Yes ☐ No ☒ N/A ☐
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

Not applicable.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?
Yes ☐ No ☒ N/A ☐
2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?
Yes ☒ No ☐ N/A ☐
3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Not applicable.

Section VII: Identification and Removal of Barriers

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?
Yes ☒ No ☐
2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?
Yes ☒ No ☐ N/A ☐
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.

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Trigger 1 FY2019	PWD among voluntary and involuntary separations exceed that of person without disabilities.			
Barrier(s)	BEP lacks a comprehensive retention strategy for its employees with disabilities.			
Objective(s)	To retain persons with disabilities.			
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
Patricia (Marty) Greiner, Deputy Director (Chief Administrative Officer) Judith Diaz Myers, Acting Chief, Office of Equal Employment and Diversity Management Karnelis Godette, Chief, Office of Human Resources (Karnelis.Godette@bep.gov)		Yes		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
03/30/2019	OEODM analyze workforce separation data to identify barriers retaining employees with disabilities	Yes		11/30/2018
03/30/2019	OEODM train workforce on reasonable accommodation program and workplace personal assistance services.	Yes		2/5/2019 3/4/2019 4/1/2019 4/2/2019 4/7/2019 5/30/2019 6/3/2019 6/4/2019 7/1/2019 7/9/2019
06/15/2019	OEODM present barrier analysis and draft strategic plan for retention of PWD to OHR	Yes		5/7/2019 7/21/2019
09/30/2019	In collaboration with OHR, implement strategic plan to address retention.	Yes	09/30/2020	
09/30/2019	In collaboration with OHR, continue promotion of training, mentoring programs and similar programs that address advancement.	Yes		8/20/2019
09/30/2020	Continue to ensure accessibility of technology and facilities	Yes		