



The Bureau of  
**Engraving & Printing**

# **FY 2024 MANAGEMENT DIRECTIVE 715**



*"We have made significant progress as an organization, and I have no doubt this is due to the teamwork and efforts of our senior leadership, managers, supervisors, and employees. Let's continue to make our work environment the 'BEPlace' to be, where we treat each other with dignity and respect; create a welcoming and inclusive workplace; and execute work requirements based on equal opportunity principles." Patricia Collins, BEP Director, June 11, 2024*

**BUREAU OF ENGRAVING AND  
PRINTING ANNUAL EEO PROGRAM STATUS  
REPORT FISCAL YEAR 2024**

**PARTS A THROUGH D**

**PART A – DEPARTMENTAL OR AGENCY IDENTIFYING INFORMATION**

Agency	Second Level Component	Address	City	State	Zip Code	Agency Code	FIPS Code
United States Department of the Treasury	Bureau of Engraving and Printing	14 <sup>th</sup> & C Streets SW	Washington	DC	20228	TRAI	11001

**PART B – TOTAL EMPLOYMENT**

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	1889	54	1943

**PART C.1 HEAD OF AGENCY AND HEAD OF AGENCY DESIGNEE**

Agency Leadership	Name	Title
Head of Agency	Patricia Collins	Director
Head of Agency Designee	Patricia (Marty) Greiner	Deputy Director (Chief Administrative Officer) and Diversity and Inclusion Officer (DIO) <i>October 2023 to April 2024</i>
	Harry Singh	Acting Deputy Director (Chief Administrative Officer) and Diversity and Inclusion Officer (DIO) <i>May to September 2024</i>

**PART C.2 – AGENCY OFFICIAL(S) RESPONSIBLE FOR OVERSIGHT OF EEO**

EEO Program Staff	Name	Title	Occupational Series	Phone Number	Email Address
Principal EEO Director/Official	Judy Caniban	Chief	0260	202-914-8658	Judy.Caniban@bep.gov
Affirmative Employment Program Specialist	Julia Kohli	EEO Specialist	0260	202-874-2437	Julia.Kohli@bep.gov
Complaints and Compliance Program Specialist	James Young	EEO Specialist	0260	202-874-0099	James.Young@bep.gov <i>October 2023 to June 2024</i>
	Charles Brooks	Supv. EEO Specialist	0360	817-847-3644	charles.brooks@bep.gov <i>August to September 2024</i>

Special Emphasis Program Specialist	Paula Rathers	EEO Specialist	0260	817-847-3950	Paula.Rathers@bep.gov
Hispanic Program Specialist	Julia Kohli	EEO Specialist	0260	202-874-2437	Julia.Kohli@bep.gov
Women's Program Specialist	Julia Kohli	EEO Specialist	0260	202-874-2437	Julia.Kohli@bep.gov
Disability Program Specialist	Julia Kohli	EEO Specialist	0260	202-874-2437	Julia.Kohli@bep.gov
Reasonable Accommodation Program Coordinator	Lynette Taylor	EEO Specialists	0260	202-874-4571	Lynette.Taylor@bep.gov
	Catherine DeGrate			817-847-3681	Catherine.DeGrate@bep.gov
Alternative Dispute Resolution Program Specialists	James Young	EEO Specialists	0260	202-874-0099	James.Young@bep.gov <i>October 2023 to June 2024</i>
	Catherine DeGrate			817-847-3681	Catherine.DeGrate@bep.gov <i>July to September 2024</i>
Anti-Harassment Program	Nancy Danganan	Senior EEO Specialist	0260	202-449-2158	Nancy.Danganan@bep.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Jessica Ulrey	HR Specialist	0201	817-847-3684	Jessica.Ulrey@bep.gov
Principal MD-715 Preparer	Julia Kohli	EEO Specialist	0260	202-874-2437	Julia.Kohli@bep.gov

## PART D.1 – LIST OF SUBORDINATE COMPONENTS COVERED IN THIS REPORT

Subordinate Component	City	State	Country	Agency Code	FIPS Code
None					

## PART D.2 – MANDATORY AND OPTIONAL DOCUMENTS FOR THIS REPORT

*In the table below, BEP must submit these documents with its MD 715 Report*

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

*In the table below, BEP may decide whether to submit these documents with its MD 715 Report*

Did BEP submit the following optional documents?	Please Respond Yes or No	Comment
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	Incorporated into BEP's Affirmative Action Plan
Diversity and Inclusion Plan Under Executive Order 13583	No	Incorporated into BEP's Diversity, Equity, Inclusion and Accessibility Plan Under Executive Order 14035
Diversity Policy Statement	Yes	
Human Capital Strategic Plan	Yes	
EEO Strategic Plan	Yes	Incorporated into BEP's Diversity, Equity, Inclusion and Accessibility (DEIA) Plan
Results From Most Recent Federal Viewpoint Survey or Annual Employee Survey	Yes	

## PART E. EXECUTIVE SUMMARY

### Mission

The Bureau of Engraving and Printing (BEP) is a bureau under the Department of the Treasury. 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. BEP has two production facilities, one in Washington, DC and one in Fort Worth, Texas.

The following strategic goals allow BEP to be responsive and effective in accomplishing its mission:

- ❖ Execution: To deliver quality products to our stakeholders in a timely, cost-effective, and environmentally responsible manner.
- ❖ Innovation: To create innovative designs, processes, and products that exceed stakeholders' expectations.
- ❖ Excellence: To achieve overall excellence by balanced investment in people, processes, facilities, and technology.

The ingenuity, industriousness, and commitment of BEP's employees are the driving force towards achieving these goals; and strengthen BEP's focus to recruit, develop, and retain a 21<sup>st</sup> century workforce.

### Introduction

This report covers the period from October 1, 2023, through September 30, 2024, and outlines BEP's Equal Employment Opportunity (EEO) program activities for fiscal year (FY) 2024. The report highlights BEP's accomplishments during FY 2024, and details the FY 2025 planned activities and strategies towards continuing to achieve a model EEO program. Below is the key for the workforce analysis.

Key for Workforce Analysis	
HM	Hispanic Male
HF	Hispanic Female
WM	White Male
WF	White Female
BM	Black Male
BF	Black Female
AM	Asian Male
AF	Asian Female
NHOPI M	Native Hawaiian/Other Pacific Islander Male
NHOPI F	Native Hawaiian/Other Pacific Islander Female
AIANM	American Indian/Alaskan Native Male
AIANF	American Indian/Alaskan Native Female
2+RacesM	Two or More Races Male
2+RacesF	Two or More Races Female
PWD	People with Disabilities
PWTD	People with Targeted Disabilities
Note	<i>Unless otherwise indicated numbers are shown in percentages</i>

## Workforce Analysis

As of September 30, 2024, the total workforce consisted of 1,943 civilian employees: 1,889 (97.22 percent) permanent and 54 (2.78 percent) temporary employees. The total workforce represents an increase of 37 employees, a net change of 1.94 percent over FY 2023. Permanent employees increased by 31, a net change of 1.67 percent from FY 2023, while temporary employees increased by 6, a net change of 12.50 percent over FY 2023.

### a. Workforce Participation Rates by Race/Ethnicity, Sex, and Disability Status

In FY 2024, White males (40.9 percent) and Black males (23.21 percent) continued to be the two largest groups within BEP's workforce, followed by Black females (12.15 percent), Hispanic males (9.16 percent), and White females (6.69 percent). Other groups (i.e., Hispanic females, Asian males, Asian females, Native Hawaiian Other Pacific Islander [NHOPI] females and males, American Indian/Alaskan Native [AIAN] females and males and Two or More Races), collectively, comprised 8.74 percent of BEP's total workforce. (See *Diagram [D] 1*)

All male groups and Black females continue to have good participation at BEP as compared to their availability in the civilian labor force (CLF). The challenge BEP has continued to experience is bringing Hispanic females and White females into the BEP workforce at a rate comparable to their availability in the CLF. Overall, BEP experiences low participation rates for females when compared to the CLF, while the presence of male employees within BEP has historically exceeded the CLF. (See *D1*)

Diagram 1: Overall BEP Workforce by Race, National Origin (RNO) and Sex

FY	Males	Females	HM	HF	WM	WF	BM	BF	AM	AF	NHOPIM	NHOPIF	AIANM	AIANF
CLF	51.79	48.21	6.8	6.16	35.7	31.8	5.7	6.61	2.19	2.18	0.08	0.08	0.31	0.31
FY 2022	77.93	22.07	8.6	1.8	40.9	5.96	24.4	12.5	3.3	1.4	0.26	0.00	0.57	0.16
FY 2023	77.23	22.77	8.9	2.2	39.9	6.56	24.1	12.2	3.15	1.36	0.16	0.05	0.58	0.1
FY 2024	77.1	22.9	9.16	2.26	40.04	6.69	23.21	12.15	3.35	1.39	0.15	0.05	0.67	0.1

The participation rates of persons with disabilities (PWD)<sup>1</sup> and persons with targeted disabilities (PWTD) have continued to increase for the past six fiscal years. At the end of FY 2024, 24.70 percent (480 employees) were coded as PWD, which exceeded the Federal goal of 12.0 percent and was an 11.37 percent (49 employees) positive net change from FY 2023. On the other hand, 2.68 percent (52 employees) self-identified PWTD, which was above the Federal goal of 2.0 percent and a positive net change of 15.56 percent (7 employees) compared to FY 2023. For the last five fiscal years, BEP has continued to meet or exceed these Federal goals, a significant accomplishment considering that five of the six mission-critical occupations at BEP require atypical physical effort, exposure to heavy-duty equipment or machines and/or noise. (See *D2*)

In FY 2024, 68.40 percent (1329 employees) of the BEP workforce identified themselves as having no disabilities. There were 6.90 percent (134 employees) at BEP who chose not to identify if they have a disability. Although this is a small percentage of employees choosing not to identify, this is higher than what BEP reported in FY 2023 and FY 2022, which was 4.78 percent (92 employees) and 2.49 percent (48 employees), respectively.

<sup>1</sup> Inclusive of PWTD per EEOC's requirement.



Diagram 2: Overall BEP Workforce by Disability

Program	FY 2021	FY 2022	FY 2023	FY 2024	Details
People with Disability (PWD)	≤ GS-10	≤ GS-10	≤ GS-10	≤ GS-10	<ul style="list-style-type: none"> <li>FY 2021: GS-1 to GS-10 = 23.43%; GS-11 to SES = 22.36%</li> <li>FY 2022: GS-1 to GS-10 = 28.24%; GS-11 to SES = 23.67%</li> <li>FY 2023: GS-1 to GS-10 = 27.13%; GS-11 to SES = 25.85%</li> <li>FY 2024: GS-1 to GS-10 = 31.46%; GS-11 to SES = 28.51%</li> </ul>
	≥ GS-11	≥ GS-11	≥ GS-11	≥ GS-11	
People with Targeted Disability (PWTD)	≤ GS-10	≤ GS-10	≤ GS-10	≤ GS-10	<ul style="list-style-type: none"> <li>FY 2021: GS-1 to GS-10 = 2.09%; GS-11 to SES = 2.76%</li> <li>FY 2022: GS-1 to GS-10 = 2.67%; GS-11 to SES = 2.60%</li> <li>FY 2023: GS-1 to GS-10 = 2.43%; GS-11 to SES = 2.70%</li> <li>FY 2024: GS-1 to GS-10 = 0.94%; GS-11 to SES = 3.75%</li> </ul>
	≥ GS-11	≥ GS-11	≥ GS-11	≥ GS-11	
Overall Disabilities	PWTD	PWTD	PWTD	PWTD	<ul style="list-style-type: none"> <li>FY 2021: PWTD = 2.44%; PWD = 19.92%</li> <li>FY 2022: PWTD = 2.31%; PWD = 21.86%</li> <li>FY 2023: PWTD = 2.36%; PWD = 22.62%</li> <li>FY 2024: PWTD = 2.68%; PWD = 24.70%</li> </ul>
	PWD	PWD	PWD	PWD	
<b>G</b>	<b>Met or Exceeded 12% PWD and 2% PWTD Federal Goals</b>			<b>R</b>	<b>Not meeting Federal Goals</b>

b. Workforce Participation in Mission Critical Occupations<sup>2</sup>

The diagram below shows the participation rates in each mission critical occupation (MCO). Occupational series 4406 (Letter Press Operator) is the most populous occupation within BEP. BEP has also designated 0083 (Police), 2210 (Information Technology Management), 2606 (Electronic Industrial Controls Mechanic), 4454 (Intaglio Press Operating), and 6941 (Bulk Money Handling) as MCOs. Males outnumbered females across all demographic groups in all MCOs in the respective occupational CLF (OCLF). Black males are the only demographic group participating above the respective OCLF in all six of the MCOs. Hispanic females and White females are the demographic groups who have consistently been participating below OCLF in four (0083, 2606, 4406, and 4454) and five (0083, 2210, 2606, 4406, and 4454) of the six MCOs, respectively. White males have low participation in four (0083, 2210, 2606, and 6941); however, their low participation in 2606 is not considered a significant trigger at this time. Hispanic male participation is low in two MCOs (2606, and 6941), which is an improvement from FY 2023, when this group also had low participation in 2210. Black females have lower participation than the OCLF in one MCO (4406); Asian males are not participating at the rate comparable to their availability in the OCLF in three of the MCOs (2210, 4406 and 4454); Asian females were significantly absent in two MCOs (4406 and 4454) despite their availability in the respective OCLF; Although NHOP and AIAN males and females have low participation rates in some MCOs, their availability in the OCLF is very low, in some cases at or below 0.60 percent.

<sup>2</sup> Statistically significant cited when participation rate is 0.6 percent or more below the OCLF.

Diagram 3: Workforce Participation in MCOs

Occ Code		Male	Female	HM	HF	WM	WF	BM	BF	AM	AF	NHOPI	NHOPIF	AIANM	AIANF
0083	%	91.10	8.90	16.75	1.05	31.94	3.14	37.70	4.19	3.14	0.00	0.00	0.52	1.05	0.00
OCLF		86.40	13.60	12.10	2.40	60.70	7.60	9.40	3.00	1.80	0.20	0.10	0.00	0.50	0.10
2210	%	68.82	31.18	4.30	1.08	26.88	8.60	30.11	17.20	5.38	4.30	0.00	0.00	1.08	0.00
OCLF		70.90	29.10	4.50	1.60	54.30	21.60	3.60	2.50	7.00	2.60	0.10	0.00	0.10	0.10
2606	%	97.12	2.88	9.62	0.00	68.27	1.92	16.35	0.96	2.88	0.00	0.00	0.00	0.00	0.00
OCLF		95.30	4.70	12.60	0.60	70.10	3.00	7.90	0.80	2.30	0.20	0.10	0.00	0.60	0.00
4406	%	97.81	2.19	12.28	0.44	74.12	0.88	8.77	0.44	2.19	0.00	0.00	0.00	0.00	0.44
OCLF		74.20	25.80	9.40	3.50	54.40	17.90	6.10	2.70	2.90	0.90	0.10	0.00	0.30	0.10
4454	%	96.90	3.10	13.18	0.78	67.44	0.00	11.63	2.33	1.55	0.00	0.00	0.00	1.55	0.00
OCLF		74.20	25.80	9.40	3.50	54.40	17.90	6.10	2.70	2.90	0.90	0.10	0.00	0.30	0.10
6941	%	77.78	22.22	8.59	4.55	24.75	5.05	42.42	12.63	1.01	0.00	0.51	0.00	0.51	0.00
OCLF		92.00	8.00	17.20	1.20	51.10	4.50	20.10	2.00	1.20	0.10	0.20	0.00	0.60	0.10

c. New Hires by RNO and Sex

In FY 2024, BEP had 221 new hires. The diagram below shows that nearly 68 percent of all new hires were males. In contrast, BEP onboarded females at a much lower rate (32.13 percent), with White females significantly below their availability in the CLF. Of all groups, White males and Black males were the two groups with the highest percentage of hires for the last three fiscal years. The trend for the past five years has been for most new hires to be White closely followed by Black, while the least hired groups were AIAN, NHOPI, Asian and Hispanic. (See D4). Not shown on the chart below is that 2+RacesF were hired at a rate of 0.45 percent which is below their CLF of 1.05 percent.

Diagram 4: New Hires by RNO and Sex

New Hires	Males	Females	HM	HF	WM	WF	BM	BF	AM	AF	NHOPI	NHOPIF	AIANM	AIANF
CLF	51.79	48.21	6.82	6.16	35.65	31.82	5.70	6.61	2.19	2.18	0.08	0.08	0.31	0.31
FY 2022	76.75	23.25	14.04	1.32	35.96	8.33	22.37	10.09	4.39	3.07	0.00	0.00	0.00	0.00
FY 2023	67.72	32.28	10.58	6.35	32.80	11.11	17.99	12.70	4.76	1.59	0.00	0.53	0.00	0.00
FY 2024	67.87	32.13	9.05	3.17	33.48	11.76	18.55	15.38	4.07	1.36	0.00	0.00	1.81	0.00

d. New Hires in Mission-Critical Occupations by RNO and Sex

In FY 2024, male new hires in four of the MCOs (2606 and 6941) were below their respective OCLF, down from four MCOs in FY 2023. For female new hires, four job series (0083, 2210, 4406, 4454) were below their OCLF, which was an increase from three OCLFs in FY 2023.

When comparing participation rates in the MCOs and new hires by MCO (D3 vs D5), it was evident that BEP experienced the most challenges with hiring females and White males for MCOs, notwithstanding their availability in the OCLF, which potentially points towards the need to continue refining BEP's outreach and recruitment efforts based on analysis of the candidates for MCO positions being reached. Common across the new hires of females and White males was their low participation rate in 0083 and 4454. One hundred percent of the hiring in the 4406 and 4454 series was male, closely followed by the 0083 series with 95.00 percent of new hires being male.



Additionally, there were no new hires of Asian females, NHOPI males and females, or AIAN females in the MCOs in FY 2024. Not shown on D-5 (*below*) is that 2+RacesM were hired at 0.52 percent in 0083, 1.08 percent in 2210, 0.44 percent in 4406, and 1.55 percent in 4454; 2+RacesF had no new hires in the MCOs in FY 2024. While 2+RacesM continue to have low participation in MCO new hires overall, their participation improved significantly since FY 2023, when the group had only one new hire across all MCOs.

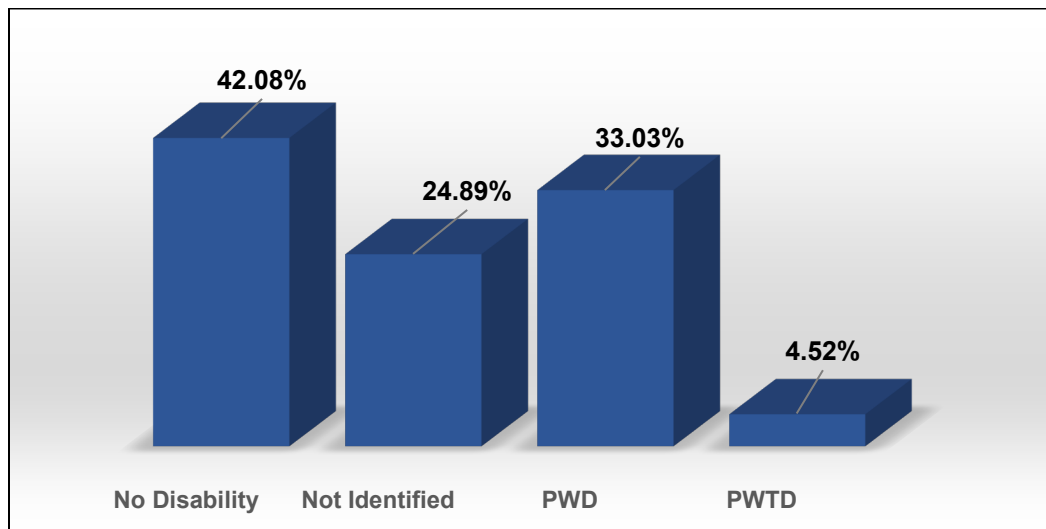
Diagram 5: New Hires in MCOs by RNO and Sex

Series	Males	Females	HM	HF	WM	WF	BM	BF	AM	AF	NHOPI M	NHOPI F	AIANM	AIANF
0083	95.00	5.00	15.00	0.00	25.00	5.00	40.00	0.00	10.00	0.00	0.00	0.00	5.00	0.00
OCLF	86.40	13.60	12.10	2.40	60.70	7.60	9.40	3.00	1.80	0.20	0.10	0.00	0.50	0.10
2210	80.00	20.00	10.00	0.00	30.00	0.00	30.00	20.00	0.00	0.00	0.00	0.00	0.00	0.00
OCLF	70.90	29.10	4.50	1.60	54.30	21.60	3.60	2.50	7.00	2.60	0.10	0.00	0.10	0.10
2606	90.91	9.09	18.18	0.00	63.64	9.09	9.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OCLF	95.30	4.70	12.60	0.60	70.10	3.00	7.90	0.80	2.30	0.20	0.10	0.00	0.60	0.00
4406	100.00	0.00	17.65	0.00	70.59	0.00	5.88	0.00	5.88	0.00	0.00	0.00	0.00	0.00
OCLF	74.20	25.80	9.40	3.50	54.40	17.90	6.10	2.70	2.90	0.90	0.10	0.00	0.30	0.10
4454	100.00	0.00	33.33	0.00	33.33	0.00	16.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OCLF	74.20	25.80	9.40	3.50	54.40	17.90	6.10	2.70	2.90	0.90	0.10	0.00	0.30	0.10
6941	80.65	19.35	12.90	9.68	35.48	0.00	32.26	9.68	0.00	0.00	0.00	0.00	0.00	0.00
OCLF	92.00	8.00	17.20	1.20	51.10	4.50	20.10	2.00	1.20	0.10	0.20	0.00	0.60	0.10

e. New Hires by Disability

Of the 221 new hires in FY 2024, 73 were PWD and 10 were PWTD. At 33.03 percent PWD and 4.52 percent PWTD, both new hire rates exceeded the Government-wide goals of 12 percent and 2 percent respectively. (See D6)

Diagram 6: New Hires by Disability



f. New Hires in MCOs by Disability

A review of the new hires in MCO shows that the 0083 (Police), 4406 (Letter Press Operator), 4454 (Intaglio Press Operating) and 6941 (Bulk Money Handling) series continued to have no new hires from the PWTD group. Additionally, no PWTD were hired into 2210 (Information Technology), contrasted with one PWTD hired into the 2210 series in FY 2023. However, 16.18 percent of the five new hires in the 2606 (Electronic Industrial Controls Mechanic) series were PWTD. The total number of PWTD hires into MCOs in FY 2024 was comparable to the number of PWTD hires in the past two years with two in FY 2023 and two in FY 2022. It is also noted that PWD accessions into the 0083, 2210, and 2606 series far exceeded the 12 percent goal, with 60 percent, 60 percent, and 33.45 percent of new hires, respectively. (See D7).

Diagram 7: New Hires in MCOs by Disability

MCO		No Disability	Not Identified	PWD	PWTD
0083	#	6	2	12	0
	%	30.00	10.00	60.00	0.00
2210	#	3	1	6	0
	%	30.00	10.00	60.00	0.00
2606	#	4	2	5	2
	%	36.36	18.18	45.45	18.18
4406	#	13	4	0	0
	%	76.47	23.53	0.00	0.00
4454	#	3	3	0	0
	%	50.00	50.00	0.00	0.00
6941	#	13	9	9	0
	%	41.94	29.03	29.03	0.00

g. Separations by RNO and Sex

In FY 2024, there were 181 separations. A review of those separations indicates that 67.4 percent were males and 32.60 percent were females. Of the male separations, White males (30.94 percent) and Black males (25.97 percent) had the highest participation rates. This trend holds true when reviewing the permanent workforce, where 67.05 percent were male separations with 31.21 percent being White male separations and 24.86 percent Black male separations. Black males had the highest number of the involuntary separations (55.56 percent of the total workforce's involuntary separations, and 57.14 percent of the permanent workforce's involuntary separations).

However, in FY 2024, White males were joining the BEP workforce at a higher rate (33.48 percent of new hires) than their separations (30.94 percent). The FY 2024 separation rate for White males was significantly below their separation rate in FY 2023, (43.68 percent). Conversely, in FY 2024, Black males joined the BEP workforce at 18.55 percent, a rate significantly below their separation rate (25.97 percent). Ideally, the separation rate would be lower than the new hire rate.

In FY 2024, Hispanic females and White females continued to be hired at higher rates, 6.35 percent, and 11.11 percent respectively, than they separated (3.31 percent and 11.05 percent, respectively). Of possible concern is Black females who separated faster than they were hired in FY 2024, as well as in FY 2023. (See D8)

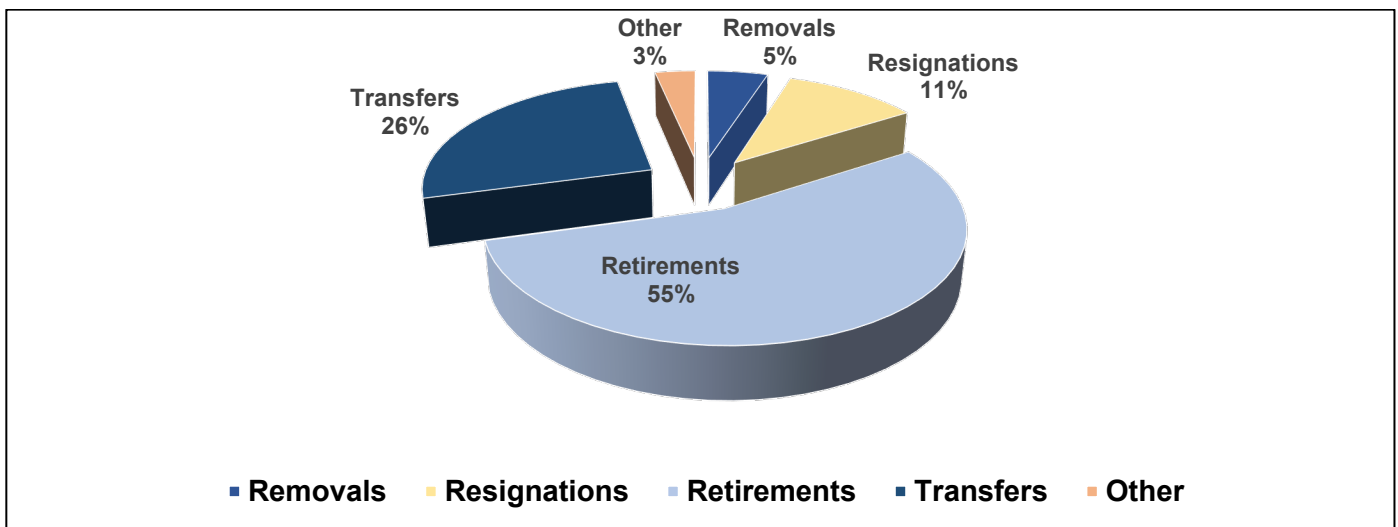
Diagram 8: Separations vs New Hires by RNO and Sex

FY 2024	Males	Females	HM	HF	WM	WF	BM	BF	AM	AF	NHOPIIM	NHOPIF	AIANM	AIANF
New Hires	67.87	32.13	9.05	3.17	33.48	11.76	18.55	15.38	4.07	1.36	0.00	0.00	1.81	0.00
Separation	67.40	32.60	7.18	3.31	30.94	11.05	25.97	17.13	2.21	1.10	0.00	0.00	0.55	0.00

Note: Not displayed on D8 is the hire of two and separation of one 2+RacesM in FY 2024.

Of the 181 separations, retirement accounted for 54.70 percent (99) of separations in FY 2024, followed by 29.28 percent other personnel actions (53). The group “other” includes small number of a variety of actions including death (6), discharge (0), termination (1), and transfers (47). Resignation was the reason for the 11.05 percent (20) separations while 4.97 percent (nine) were removal. (See D9) Permanent employees made up 95.58 percent (173) of the separations, while 4.42 percent (8) of the FY 2024 separations were from temporary employees.

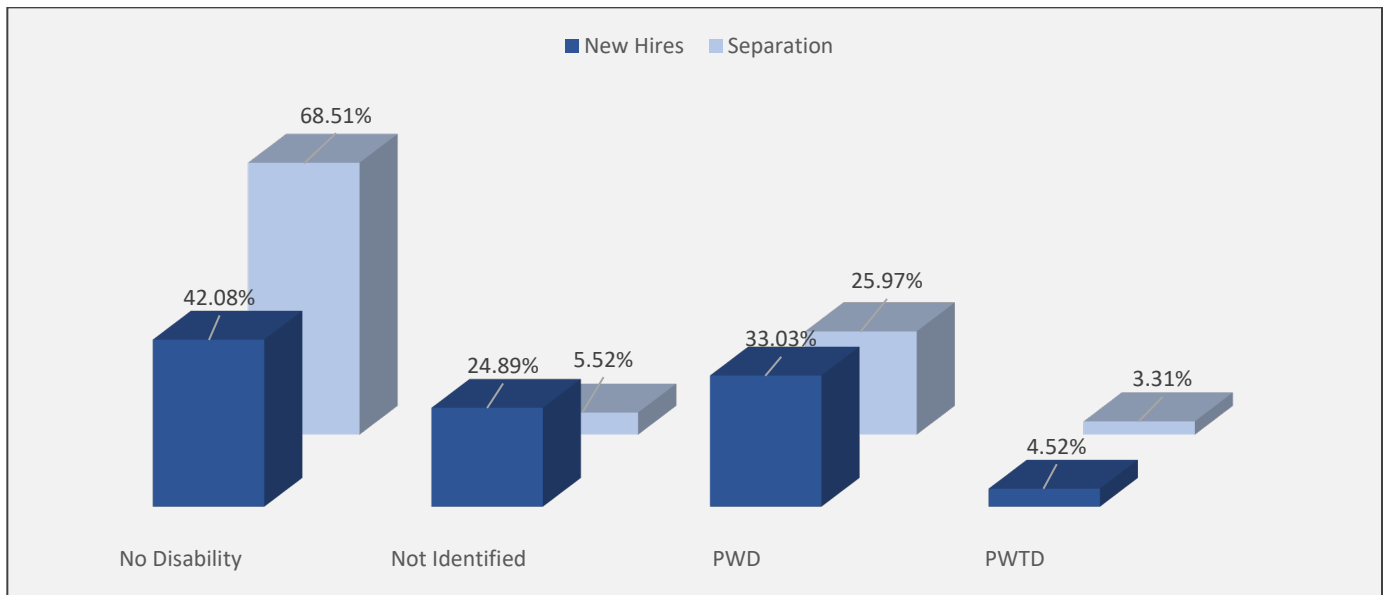
Diagram 9: Types of Separations



#### h. Separations by Disability

An analysis of separations shows that 25.97 percent (47 employees) were PWD, while 3.31 percent (six employees) were PWTD. Comparing the new hire and separation rates shows that BEP hired PWDs and PWTDs at a higher rate than these groups were separating from the BEP workforce. (See D10)

Diagram 10: Separations vs New Hires by Disability



i. Senior leadership and Pipeline

In FY 2024, members of the Senior Executive Service (SES) at BEP totaled 11 with males representing 72.73 percent of the SES and females representing 27.27 percent, compared with 63.65 percent and 36.35 percent in FY 2023. White males had the highest representation at 45.45 percent of SES, followed by White females at 18.18 percent. Black males, Black females, Asian males, and Hispanic males also participate at the SES level. No other groups were present. Males have a significantly higher participation rate as compared to females. (See *D11*)

White males, White females, Black females, and Asian females have good participation rates in the pipeline at the GS-15 level. All groups, except NHOPi females and AIAN females, were present at the feeder grade (GS-14) for senior leadership grade levels.

Late in FY 2023, the Department of the Treasury requested that its bureaus conduct an analysis of Black females in SES positions. In FY 2024, multiple triggers were found at the SES grade level including Black females. At BEP, Black females are represented at 9.09 percent of the SES workforce, which is above the CLF of 6.62 percent, but below Black female participation in the GS-14 and GS-15 levels, at 14.49 percent and 13.89 percent, respectively. Additionally, Black females comprise 12.15 percent of the entire BEP workforce. We will continue to review all available information, including BEP's recruitment and hiring practices, to determine if there are barriers preventing certain groups, including Black females from full participation at the SES and GS-15 grade levels.

Diagram 11: Participation in Senior Leadership and Pipeline Grades by RNO and Sex

Senior Grades		All	Male	Female	HM	HF	WM	WF	BM	BF	AM	AF	NHOPI M	NHOPI F	AIANM	AIANF	2+RaceM	2+RaceF
GS-14	#	207	137	70	11	4	69	28	35	30	17	7	1	0	3	0	1	1
	%	100.00	66.18	33.82	5.31	1.93	33.33	13.53	16.91	14.49	8.21	3.38	0.48	0.00	1.45	0.00	0.48	0.48
GS-15	#	36	25	11	1	0	16	5	8	5	0	1	0	0	0	0	0	0
	%	100.00	69.44	30.56	2.78	0.00	44.44	13.89	22.22	13.89	0.00	2.78	0.00	0.00	0.00	0.00	0.00	0.00
SES	#	11	8	3	1	0	5	2	1	1	1	0	0	0	0	0	0	0
	%	100.00	72.73	27.27	9.09	0.00	45.45	18.18	9.09	9.09	9.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00

j. Treasury-Requested Analysis of Hispanic Females in Science, Technology, Engineering, and Math (STEM) Positions

The Treasury bureaus were also asked to conduct an analysis of Hispanic females in STEM positions. The top five most populous STEM occupations at BEP in FY 2024, were Information Technology (2210), General Engineering (0801), Contracting (1102), General Physical Sciences (1301), and Chemistry (1320). (See D12).

Diagram 12: STEM Occupation Series at BEP

Occ Series Code	Occ Series Description	Positions at BEP
0028	Environmental Protection Specialist	4
0801	General Engineering	56
0808	Architecture	1
0810	Civil Engineering	1
0819	Environmental Engineering	1
0830	Mechanical Engineering	6
0850	Electrical Engineering	4
0896	Industrial Engineering	1
1102	Contracting	53
1301	General Physical Sciences	40
1320	Chemistry	31
1515	Operations Research	3
2210	Information Technology Management	94

BEP data show that except for 1102, Hispanic females have robust participation in all other four most populous STEM occupations when compared to their availability in the OCLF. (See D13).

Diagram 13<sup>3</sup>: Participation of Hispanic Females in BEP's Top STEM Occupations

STEM	Hispanic Females
<b>2210 INFORMATION TECHNOLOGY</b>	<b>2.13</b>
<b>OCLF</b>	<b>1.60</b>
<b>0801 GENERAL ENGINEERING</b>	<b>5.36</b>
<b>OCLF</b>	<b>0.99</b>
<b>1102 CONTRACTING</b>	<b>0.00</b>
<b>OCLF</b>	<b>4.60</b>
<b>1301 GENERAL PHYSICAL SCIENCES</b>	<b>5.00</b>
<b>OCLF</b>	<b>2.81</b>
<b>1320 CHEMISTRY</b>	<b>6.45</b>
<b>OCLF</b>	<b>2.39</b>

Analyzing the participation of Hispanic females in the BEP STEM occupations will continue in FY 2025.

#### FY 2024 Summary of Workforce Analysis:

- Hispanic females and White females** continue to experience *significant low participation* in the overall BEP workforce and in at least four of the six MCOs.
- Black males and females** new hire rates were *significantly above* the CLF; however, these two groups were also *separating faster* when compared to the rate they were hired into the BEP workforce.
- BEP continues to *exceed* the Federal goals of 12 percent and 2 percent for **PWD and PWTD** respectively, in the overall workforce; however, the rate of PWTDs at the GS-1 to GS-10 cluster *fell short* of the 2 percent goal for the first time since FY 2020.
- PWD and PWTD** were hired at rates *above* the Federal goals of 12 percent and 2 percent respectively, and they separated at rates that were *lower* than the new hire or accession rate.
- In FY 2024, the MCOs that hired the most PWDs were **0083 Police and 6941 Bulk Money Handling**. The only MCO that hired PWTD was **2606 (Electronic Industrial Controls Mechanic)**.
- The **SES** at BEP were predominantly **male**; however, the **White female and Black female** groups were represented at the SES level.

#### FY 2024 Accomplishments

The FY 2024 accomplishments are documented here through the six essential elements of a model EEO program as found below.

- Demonstrated Commitment from Senior Leadership:

BEP demonstrated strength in this element as evidenced by the BEP Director's top-down approach in communicating her commitment to a model EEO program and direct engagement from BEP's Senior Executive Team (SET).

<sup>3</sup> Table 8 Source: Data Insight report Workforce by ERI and Gender within Specified Occupational Series, as of pay period ending November 16, 2024. Because this report could not be backdated to display FY 2024 data, some participation rates vary from table A6.



- BEP's Acting Director issued all the applicable EEO policies on October 1, 2023, and the policies were re-issued on June 11, 2024, within 90 days of the new BEP Director's official designation. All policy statements<sup>4</sup> were made available on BEP's external and internal websites. On the external site, [Office of Equal Opportunity and Diversity Management | Engraving & Printing \(bep.gov\)](https://www.bep.gov/office-of-equal-opportunity-and-diversity-management-engraving-and-printing), the information can be easily found by using the search tool or on the landing page under Featured Resources & Services and under Policy.
- The BEP Director leveraged Special Emphasis Program (SEP) requirements when issuing weekly messages to the BEP workforce, emphasizing EEO as an organizational imperative and a shared responsibility of all BEP employees.
- The SET championed SEP by becoming Executive Sponsors (ES) for each SEP and actively engaging in BEP's efforts to bring awareness and education in EEO during BEP and Treasury SEP events. ES disseminated messaging in recognition of their respective SEP observance and enhanced cross-cultural awareness and empathy by educating the workforce about the history and notable achievements of the recognized group, as well as the challenges SEP groups continue to face.
- The SET continued to support the Barrier Analysis Team (BAT) through the designated ES who provided executive direction and guidance on barrier analysis and elimination efforts. The BAT's ES attended biweekly team meetings and participated in barrier analysis activities and provided valuable input and mentorship to the team throughout the process of preparing their annual brief to the SET. The ES' active participation and support has been key to sustaining the BAT's efforts.
- BEP's Director signed a new Circular establishing procedures for Employee Resource Groups (ERG) in April 2024, providing BEP employees to form ERGs with the goal of advancing BEP's efforts for a more welcoming, respectful and engaging workforce.
- The SET expanded the capacity of BEP's Anti-Harassment Program (AHP) to respond to reports of harassment by increasing the number of internal factfinders and continuing to authorize the Office of Equal Opportunity and Diversity Management (OEODM) to utilize contractor services, when needed, for a more appropriate, thorough and timely fact-finding into the allegation/s of harassment.
- BEP increased the budget for EEO and reasonable accommodation programs (Braille machine, 10 new scooters, 3 new wheelchairs, civil treatment training), and contract support to conduct organizational 508 assessment.

b. Integration of EEO Into the Agency's Strategic Mission:

The measures of success for this program element in FY 2024, included sustained effective collaboration and partnership between internal BEP organizations and key stakeholders; increased BEP workforce's EEO awareness and competencies; and increased capacity to deploy EEO program requirements. Specifically:

- BEP approved the establishment of three new ERGs in FY 2024. The new ERGs are: Veterans Got Your Six ERG (VGY6), Caminos Hispanic ERG, and Women in Manufacturing ERG (WiM). The ERGs partnered with OEODM to host an ERG Fair in May 2024. The fair served to recruit

<sup>4</sup> Reasonable Accommodations Policy Statement, Equal Employment Opportunity Policy Statement, Alternative Dispute Resolution Policy Statement, Anti-Harassment Policy Statement, Sexual Harassment Policy Statement, Personal Assistant Services Policy Statement, Sexually Offensive/Unauthorized Material on BEP Property, and Responsibility for Timely Cooperating in the EEO Complaint Process.

new members and educate the workforce about the value and benefits of ERGs.

- BEP conducted about 13 bi-weekly new employee orientations for each location (Washington, DC and Fort Worth, TX facilities) in FY 2024, incorporated EEO information and complaint filing procedures, to a total of 221 new hires.
- BEP continued to deliver mandatory EEO training for supervisors and non-supervisory employees. Both supervisors and non-supervisors were required to complete:
  - One hour of live training with five topics: EEO complaints, anti-harassment, accommodations for disabilities and religious practices, alternative dispute resolution, and information about respectful communication.
  - No FEAR Act training
- BEP also continued to refine its New Supervisors Training and deployed the module quarterly. The agenda included the topics below. A SET member kicked off each session with a review of BEP's expectations of supervisors as leaders and role models. In FY 2024, BEP conducted four New Supervisor Training sessions.
  - Recruitment and Placement
  - Performance Management
  - Developing Employees
  - Dealing with Poor Performance and Misconduct
  - Labor Relations
  - Leave Administration
  - Work-Life Flexibilities
  - EEO
- Delivered separate supervisor and nonsupervisory Civil Treatment training; facilitated organizational conflict resolution efforts to resolve workplace conflicts; conducted D&I dialogues with few selection organizations; and deployed special training on appropriate response to neurodivergent individuals, multiple sessions to include shift workers.
- Increased BEP's capacity to effectively execute EEO program requirements when OEODM onboarded/backfilled approve positions and the Office of Human Resources (OHR) established a second Outreach Coordinator position.
- BEP organizations engaged the OEODM Chief in the discussion, review, and assessment of BEP's EEO-related requirements for the replacement Washington, DC Facility, and other requirements that impact BEP employees or human resources issues. OEODM Chief was a regular participant in partnership meetings to include monthly Joint Labor Management Partnership Council, quarterly Chiefs' forum, Internal Control Policy Committee, quarterly Working Group for Business and IT (Information Technology) Change Requests (CR) and Opportunities Partnership, BEP Strategic Planning sessions and Integrated Program Management Office (IPMO) new facility workgroup.
- OEODM presented the state of BEP's EEO Program to the BEP SET and all seven Directorates' leadership teams and the ERGs in February and March 2024. The presentation also included an overview of the MD-715 report with Directorate-specific information and an overview of the results of Treasury's deployment of the Inclusion Survey, an OPM survey with five measures of inclusion (Fair, Open, Cooperative, Supportive and Empowering).
- BEP continued partnerships with minority-serving institutions that (a) create pathways to careers for high school and college students from all segments of society and positions graduates to advance in their career; and (b) provide immersive internship and academic seminars to students from hundreds of colleges and universities and young professionals from

across the U.S. and more than 25 countries. In FY 2024, BEP selected ten selected paid interns via the Scholars Intern Program, a significant increase in utilization of total 4800 hours compared to FY 2023 and FY 2022.

- BEP OHR established the FY 2022-2024 Outreach and Recruitment plan. Actions for the plan that were designated for FY 2024 were completed to respond to ongoing recruitment and retention efforts in Mission/Major Occupations and areas of low participation identified during MD-715 processing. The FY 2025-2027 Outreach and Recruitment Plan was completed at the end of FY 2024.
- BEP purchased 13 professional memberships in FY 2024 to assist in focusing recruitment and outreach to all segments of society. OHR utilized feedback and data from barrier analysis team in identifying professional memberships to obtain.
- BEP participated in 31 recruitment and outreach events in FY 2024, which were selected to enhance recruitment from all segments of society and also showcase BEP's career opportunities to high school students. A sampling of the events include outreach to Historically Black Colleges and Universities, Veterans, People with Disabilities, Women in Law Enforcement, 4-H, and Federal Asian Pacific American Council (FAPAC) events. BEP in-person participants included managers and supervisors in addition to OHR and OEODM.
- In April 2024, BEP held its second Career Fair since before COVID. It was successful in highlighting current job openings and inviting both BEP employees and non-BEP employees to explore career options at the Western Currency Facility (WCF) in Texas. OEODM had a table and shared information on the demographics of the workforce.
- OHR hosted Monthly Human Resources Update Meetings to provide supervisors and managers ongoing education and updates on topics such as Schedule A, Pathways programs, Prohibited Personnel Practices, career development, EEO-related training opportunities, and retention.
- OEODM continued to deploy virtual office hour sessions to educate the workforce on topics specific to EEO and prevention of workplace conflict. Twenty-one topics were presented with sessions were offered to all shifts, to ensure as many employees as possible had an opportunity to attend.

c. Accountability and Program Management:

BEP's FY 2024 accomplishments in this program area are as follows:

- All BEP employees continued to have a performance element in FY 2024, measuring contribution to BEP's EEO efforts.
- Managers and supervisors were also held to a higher standard measuring their efforts to ensure EEO for all employees, participation and timely response to reasonable accommodation requests, complaints or AHP processing requirements.
- Leaders from multiple offices collaborated to ensure continuation of efforts in response to the Department of the Treasury, Office of Civil Rights and Equal Employment Opportunity (OCRE) audit on the effectiveness and efficiency of BEP's Title VII and Rehabilitation Act and other EEO-related programs, including Accessibility compliance reviews on the facilities at both BEP locations. Efforts included updating the supervisory performance standards to include additional criteria related to EEO, and deployment of a Gravograph machine to support braille signage at the Washington, DC facility (both to be deployed in FY 2025).

- Bi-weekly partnership meetings between OHR and OEODM, and biweekly BAT meetings included reviewing personnel policies, practices, and procedures to determine if there are barriers to equal opportunity for certain groups.
- OEODM conducted a year-end assessment of EEO programs, issued a scorecard on the effectiveness and efficiency of the Title VII and Rehabilitation Act programs, and established a roadmap to address deficiencies and highlight best practices.
- BEP focused on the enhancement of workplace dispute resolution capabilities. BEP's Alternative Dispute Resolution (ADR) brochure was updated and deployed to OEODM's page on the bureau's SharePoint site.
- BEP continued its use of an agreement with the Federal Mediation and Conciliation Services (FMCS) to provide effective ADR services as well as training and coaching in conflict resolution techniques to the workforce. The services are used as the ADR option in EEO complaints, for facilitated discussions when harassment is alleged to the anti-harassment program and as a workplace proactive solution (WPS) to conflict. BEP engaged FMCS to conduct four organizational ADR and seven individual workplace conflicts (non-EEO). Most managers have started to understand that ADR is one of BEP's WPS to address workplace issues before they escalate.
- A dedicated parking area was identified for BEP's DC Facility (DCF) fleet of scooters, which were procured for reasonable accommodation (RA) purposes.
- Completed e-certify disability, Race and National Origin, Sex Campaign.
- Incorporated accessibility compliance considerations into BEP's physical spaces in the current location in DCF, inclusion of accessibility requirements into planning documents for new DCF facility and refresh projects at WCF and 508 compliance checks for all communications before posting in internal and external websites and dissemination to the workforce.
- In FY 2023, the Office of Enterprise Solutions (OES), which includes BEP's Section 508 Team, set up a contract for a Section 508 organizational review; in FY 2024, the assessment began with deploying a survey to BEP offices to establish a baseline. The assessment survey received a 79 percent response rate and enabled OES to identify gaps and recommend solutions. The Manager of OES' Enterprise Strategic Planning and Management Division briefed BEP's Office Chiefs on the results of the assessment and plans to continue addressing the identified gaps.
- OES developed and implemented a complaint management system to efficiently address and resolve potential accessibility compliance issues reported by users. This included mounting a fillable form on the BEP intranet for users to report issues, complaints, and questions.
- OES developed a metrics dashboard to track the five core areas of Section 508 compliance; this dashboard is intended to provide clear and actionable insights for continuous improvement.

d. Proactive Prevention

- BEP OEODM and OHR continued to develop partnership by meeting to discuss and conduct analysis in the areas of outreach and recruitment, workforce development, and performance awards. Meetings were held on a bi-weekly basis throughout the year and were directed by actions detailed in BEP's DEIA Strategic Plan.
- OEODM, OHR and the Office of Chief Counsel (OCC) continued to utilize the ADR team to

provide management officials with appropriate tools to ensure full engagement during ADR for a positive outcome.

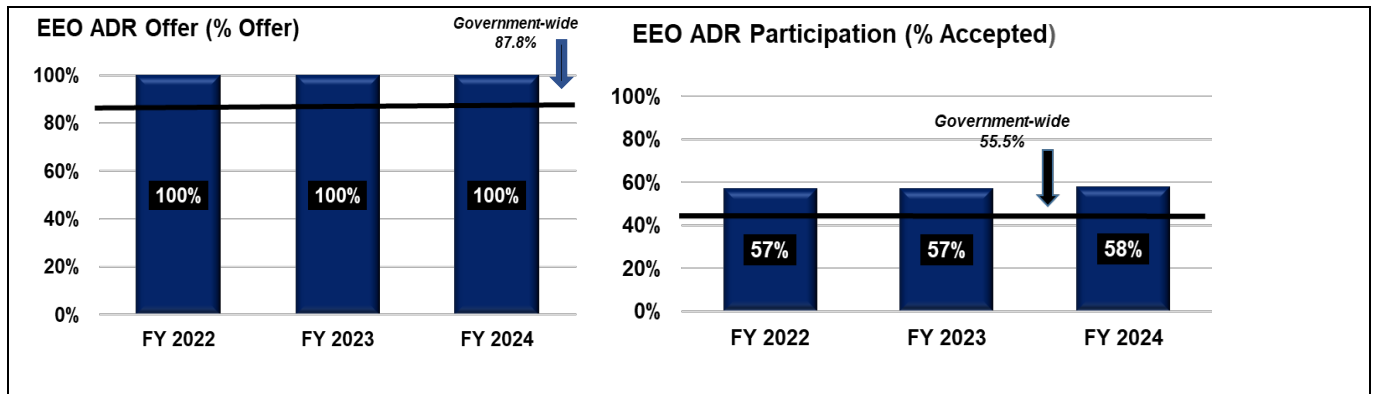
- OHR, OCC, the Offices of Security (OS) and Environmental Health and Safety (OEHS), Chief Financial Officer (CFO), and Chief Information Officer (CIO) Directorates continued to provide support to OEODM during RA processing and ADR.
  - BEP's BAT accelerated its barrier analysis efforts focusing on identifying potential barriers to all or any demographic's participation in BEP's MCOs, utilizing the Equal Employment Opportunity Commission's root cause analysis tool and the common triggers for MCOs, reviewing Position Descriptions (PD), and comparing PDs to OPM Qualification standards. The team identified and prioritized several triggers for further analysis.
  - To assist with BEP's barrier analysis efforts, BEP developed a workforce demographics dashboard as a timely resource for providing a snapshot of the workforce. In FY 2024, OEODM and CIO continued to collaboratively refine the dashboard to allow for a directorate-level data visualizations.
  - BEP re-deployed Civil Treatment training sessions in FY 2024. Building upon the content presented in mandatory EEO training, Civil Treatment provides employees and supervisors practical guidance on appropriate workplace behavior, and identifying and correcting issues before they rise to the level of harassment or discrimination. All BEP offices will receive this training. In FY 2024, OEODM delivered eight Civil Treatment for Employees sessions, engaging 139 employees; and five Civil Treatment for Leaders sessions, engaging 28 supervisors.
  - OEODM continued to provide materials for managers, supervisors, groups or Directorates to conduct facilitated discussions. In FY 2024, OEODM responded to multiple requests to facilitate short EEO discussions during regular team meetings.
  - Utilized BEP News to communicate on EEO-related topics to promote and secure buy-in from all employees.
  - The FY 2023 Affirmative Action Plan was posted on BEP's internal and external websites.
-

e. Efficiency

- Complaints and ADR Program

Processing	FY 2021	FY 2022	FY 2023	FY 2024	Accomplishments
Counseling	100%	100%	100%	100%	<p>Title 29 Code of the Federal Regulations (C.F.R) Part 1614.105 require agencies to complete counseling and issue the Notice of Right to File a Formal Complaint no later than 30 days or 90 days (if counseling is extended or when there was an ADR) from initial contact and intent to enter the precomplaint process.</p> <p><b>FY 2024: OEODM process all 34 informal complaints timely. Consequently, BEP has always exceeded the Government-wide benchmark of 95% timely counseling.</b></p>
Investigations	100%	100%	100%	100%	<p>29 C.F.R. § 1614.108 require agencies to complete investigations from formal file date within 180, 270 days if extended or 360 days if amended. Failure to complete could potentially result in sanctions. Although OCRE manages formal processing, OEODM is still responsible for timely notice to BEP officials and submission of required document and/or information.</p> <p><b>FY 2024: OEODM works closely with Treasury Office of Civil Rights and Equal Employment Opportunity to ensure timely investigations of 13 formal cases. BEP has always exceeded the Government-wide benchmark of 85% timely investigations.</b></p>
Informal Alternative Dispute Resolution (ADR)	100%	100%	100%	100%	<p>Per 29 C.F.R. § 1614.105 (f), where the aggrieved person chooses to participate in an alternative dispute resolution procedure in accordance with paragraph (b)(2) of this section, the pre-complaint processing period shall be 90 days.</p> <p><b>FY 2024: OEODM completed all 19 informal cases that accepted ADR less Than or within 90 days days with an average of 56 processing days.</b></p>

- BEP's 100 percent ADR Offer rate in FY 2024, was over the Government-wide rate of 87.8 percent. BEP's ADR Acceptance rate was 58 percent, above the Government-wide rate of 55.5 percent.



- Reasonable accommodation cases in FY 2024, were unusually high and complex. OEODM processed 37 individual requests, 8 of which included multiple accommodations requested per case. 32 requests were process within the 20-day goal. Average processing time was 11 days. Cases that went over 20 days were cases held in abeyance for an extended period due to OEODM needing to consult with BEP doctor, employee and/or supervisor on extended leave, supervisor requesting for additional time to conduct research and/or consults with OHR and/or the employee's chain of command.



f. Responsiveness

- Timely response to Treasury and EEOC requirements.

Deliverables	Due Date	Required	Status
FY 2023 Draft MD 715 PART G and PART H	October 13, 2023	OCRE	Submitted October 13, 2023
FY 2023 Draft MD 715 PART I	November 10, 2023	OCRE	Submitted November 20, 2023 (extension granted)
FY 2023 Draft MD 715 PART J	December 1, 2023	OCRE	Submitted November 30, 2023
FY 2023 Draft MD 715 PART E	December 15, 2023	OCRE	Submitted December 1, 2023
FY 2023 MD 715 Unsigned Submission	February 2, 2024	OCRE	Submitted December 15, 2023
FY 2023 MD 715 Signed Submission	Once Signed by BEP Head	OCRE	Submitted March 5, 2024
FY 2023 MD 715 Final Submission via Federal Sector EEO Program (FEDSEP)	April 1, 2024	EEOC	Submitted April 1, 2024
FY 2023 Annual Federal Equal Employment Opportunity Statistical Report of Discrimination (462 Report)	October 31, 2023	EEOC	Submitted October 24, 2023
BEP Response to EEOC's Request for Advance Information for the Technical Assist Visit	January 17, 2024	OCRE	Submitted January 17, 2024
BEP Response to EEOC's Request Post Technical Assist Visit	February 6, 2024	OCRE	Submitted January 30, 2024
FY 2023 White House Initiative Report on Blacks	January 26, 2024	OCRE	January 11, 2024
FY 2023 White House Initiative Report on Historically Black Colleges and Universities	February 27, 2024	OCRE	February 26, 2024
FY 2023 One Report (FEORP and DVAAP)	February 28, 2024; November 28, 2023	OCRE	March 5, 2024 (FEORP); December 7, 2023 (DVAAP) *with extension

**Status of FY 2024 Planned Activities**

In FY 2024, there were multiple requirements to meet for EEO. BEP's Human Capital Strategic Plan contribute to the overarching roadmap used to create a more strategic approach to meeting requirements. See Part I.

a. Outreach and Recruitment

- Action Plan: Develop and strengthen strategic partnerships with colleges and universities to create a ready source from which to recruit qualified students and graduates for entry-level and other career opportunities at BEP. Use partnerships to educate college and university personnel and students about Pathways Internships and BEP training programs.
  - FY 2024 Status: BEP identified thirteen (13) organizations and institutions to partner with in soliciting various trade and craft candidates, and continued its partnership with Montgomery College in Rockville, MD. The Bureau also sent representatives to Level Up events with HBCUs and multiple conferences to provide career opportunity information. Representatives engaged with students to educate on federal resumes, account creation and application process on USAJobs, as well as interview techniques. OHR reestablished user permissions for Handshake, a platform used to connect with educational institutions and students. OHR is using Handshake to post

job opportunities and attend virtual career fairs, reaching a broader audience of candidates.

- Action Plan: Continue to establish and maintain partnerships with minority, women, and other associations to help develop and maintain a pipeline of qualified candidates for employment in BEP's mission-critical positions.
  - FY 2024 Status: Please see list of partnerships below:
    - Association of Latino Professionals for America (ALPFA)
    - Association of People Supporting Employment First (APSE)
    - Hispanic/Latino Professionals Association (HLPFA)
    - Mid-Atlantic Association of Women in Law Enforcement (MAAWLE)
    - National Society of Black Engineers (NSBE)
    - Out to Innovate
    - Printing and Graphics Association Mid Atlantic (PGAMA)
    - Printing United Alliance
    - Society of Women Engineers (SWE)
    - The Association for Severely Handicapped (TASH)
    - Women in Federal Law Enforcement (WIFLE)
    - Women in Print
    - Women in Manufacturing (WiM)
- Partner with vocational and trade schools to highlight the modern, cutting-edge technologies, strong culture at BEP, pride in what is being produced, and supporting BEP's mission.
  - FY 2024 Status: Please see list of recruitment and outreach events below:
    - National Tech to Gov Virtual Event (Virtual)
    - Law Enforcement Recruitment Opportunities – Military (separation)(DC)
    - Fort Worth Law Enforcement Hiring Expo (TX)
    - North Texas Job Fair (TX)
    - Diversity & Inclusion Career Fair (Virtual)
    - WIFLE Foundation Inc Recruitment/Career Day (FL)
    - 13th Annual Southern MD Hiring Event (MD)
    - Dallas Veterans Job Fair (TX)
    - Dallas Diversity Group (TX)
    - FAPAC Virtual and In-person Student Career Fair (MD)
    - Fort Worth Law Enforcement Hiring Expo (TX)
    - Reliant Solutions Law Enforcement Hiring Expo (VA) and MD- Baltimore Law Enforcement Hiring Expo (MD)
    - Elevate Career Fair (VA)
    - WiM Winter Virtual Career Fair and WiM Education Foundation (WiMEF) Virtual Career Fair (Virtual)
    - BEP Summer Break 2024 Craft Demo
    - Level Up to Public Service Career Fair at HBCU (Delaware)
    - OHR began working on plans to establish partnerships with vocational schools in the DC/Maryland and Dallas/Ft. Worth areas in the next fiscal year.
    - OHR worked with representatives from BEP's Manufacturing community to plan and conduct outreach to highlight the need for vocational education and applicants.
- Action Plan: Explore and exploit appropriate social media platform as a source to recruit prospective candidates and another way to promote BEP. Enhance online presence and adapt brand to engage and attract digital talent through marketing materials, post testimonials from employees at varying career levels and occupations, and/or create blogs/newsletters. Reinforce BEP's brand through consistent messaging.

- FY 2024 Status: OHR collaborated with the Office of External Relations (OEX) on using social media to gain a presence and to more effectively brand BEP. Currently BEP has a presence on Facebook, Twitter, Instagram, YouTube, and LinkedIn. OHR also collaborated with the Office of Personnel Management and USA Staffing to build a BEP branding page on USA Jobs, taking applicants directly to all BEP posted opportunities.
- Action Plan: Institute an online and written survey to distribute during outreach and recruitment events to determine interests, background, and experiences of those demonstrated interest in the employment at BEP, and how they become aware of opportunities at BEP.
  - FY 2024 Status: OHR deployed a survey to gather this data, as well as candidate demographics; 22 responses were gathered in FY 2024. Of the responses collected, approximately 40% of respondents were female and/or minority. Within the minority responses, approximately 23% identified as African American, 9% identified as Hispanic, 9% identified as Asian / Pacific Islander, and the remaining 5% of minority respondents identified as American Indian or Alaskan Native. When asked what attracted attendees to BEP employment, salary and incentives and unique mission and work duties ranked among the top attractions, each ranking at approximately 23%. Approximately 45% of respondents were not previously aware of BEP or the type of positions offered.
- Action Plan: Evaluate post-audit applicant flow data to assess candidate pool and outreach efforts.
  - FY 2024 Status: BEP exceeded Treasury's FY 2024 threshold for the percentage of certificates that should be audited in order for Applicant Flow Data to be usable. In early FY 2025, OEODM will engage the BAT to assist in analyzing the data.
- Action Plan: Once chartered, engage Employee Resource Groups (ERG) in recruitment and outreach activities.
  - FY 2024 Status: Four ERGs were chartered in FY 2024 and are building their membership. BEP is exploring ways to engage them in recruitment and outreach activities.

b. Retention Strategy

- Action Plan: Improve the collection of voluntarily self-reported demographic data to help BEP in its effort to take an evidence-based approach to reducing potential barriers in hiring, promotion, professional development, and retention practices.
  - FY 2024 Status: OHR deployed a survey to gather candidate demographic data at career fairs; 22 responses were gathered in FY 2024. Of the responses collected, approximately 40% of respondents were female and/or minority. Within the minority responses, approximately 23% identified as African American, 9% identified as Hispanic, 9% identified as Asian / Pacific Islander, and the remaining 5% of minority respondents identified as American Indian or Alaskan Native. When asked what attracted attendees to BEP employment, salary and incentives and unique mission and work duties ranked among the top attractions, each ranking at approximately 23%. Approximately 45% of respondents were not previously aware of BEP or the type of positions offered.
- Action Plan: Establish additional manpower resource to focus on maintaining safer workspaces within BEP through effective training, education, and strategic discussions.

- FY 2024 Status: BEP increased the number of internal factfinders and continuing to authorize OEODM to utilize contractor services, when needed, for a more appropriate, thorough, and timely fact-finding into the allegation/s of harassment.
- Action Plan: Train supervisors and management officials on the requirements and processes for providing respectful and accessible workspaces.
  - FY 2024 Status: This is part of New Supervisor training as well as the mandatory EEO training, which was delivered live. Additionally, OHR hosted Monthly Human Resources Update Meetings to provide supervisors and managers ongoing education and updates on topics such as Schedule A, Pathways programs, Prohibited Personnel Practices, career development, EEO-related training opportunities, and retention.
- Action Plan: Include Accessibility requirements as one of BEP's strategic action items in the BEP Strategic Plan. Track compliance and report on status.
  - FY 2024 Status: In FY 2023, OES, which includes BEP's Section 508 Team, set up a contract for a Section 508 organizational review; in FY 2024, the assessment began with deploying a survey to BEP offices to establish a baseline and identify gaps.
- Action Plan: Once chartered, engage ERGs in retention activities through reviews of policies, practices, and procedure to assess best practices and areas for improvement.
  - FY 2024 Status: In FY 2024, several ERG leaders joined the BAT and assisted with identifying potential barriers to retention.

## **FY 2025 Action Plans**

### **a. Outreach and Recruitment**

- Establish effective partnerships with universities, employee organizations, affinity groups, and professional organizations to optimize outreach for Treasury and BEP careers and increase recruitment opportunities. Use partnerships to educate college and university personnel and students about Pathways Internships and BEP training programs.
- Develop strong partnerships with career services offices and veterans' offices at identified institutions to educate faculty, administrators, and students on available careers, programs, incentives, etc.
- Accelerate strategic consultation and engagement with appropriate hiring managers to include providing data on current BEP profile, directorate information on PWD and PWTD hires, and directorate workforce composition, to ensure data is considered when making outreach plans and hiring decisions.
- Develop tracking systems for collected resumes, and survey data collected during job fairs for barrier analysis purposes.
- Partner with OEX and the Center of Excellence to develop videos and recruitment tools to highlight BEP production positions.
- Engage appropriate stakeholders to include hiring managers, OHR and OEODM to discuss specific BEP organizations' recruitment needs or requirements and establish a strategic outreach and recruitment plan accordingly.

- Refine interest survey for recruitment and outreach events to solicit feedback on work experience and work life expectations from prospective job seekers.
- Issue an after-action report immediately following outreach and recruitment events and conduct a barrier analysis to determine if outreach and recruitment efforts reached the appropriate applicant pool.

b. Retention Strategy

- Evaluate available opportunities and/or programs for mentoring, upward mobility, leadership, and career development programs.
- Re-energize existing advancement and career development opportunities by reviewing current policies, procedures, and practices to identify deficiencies and establish meaningful solutions.
- Establish automated trackers to track internal detail assignments, and promotions. Train functional offices responsible for entering and updating information. Responsible office(s) will submit quarterly summary status reports and a full report at the end of the fiscal year.

U.S. Equal Employment Opportunity Commission  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

I, **Judy Caniban, Chief, Office of Equal Employment Opportunity** am the

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

Principal EEO Director/Official for **Bureau of Engraving and Printing**

(Insert Agency/Component Name above)

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

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

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

**Judy Marie D. Caniban** Digitally signed by Judy Marie D. Caniban  
Date: 2025.03.20 12:23:07 -04'00'

(Insert official title/series/grade above)

**Judy Caniban, Chief, Office of Equal Employment Opportunity**

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

Date

**Patricia S. Collins** Digitally signed by Patricia S. Collins  
Date: 2025.04.01 12:09:00 -04'00'

(Insert official title/series/grade above)

**Patricia Collins, Director, Bureau of Engraving and Printing**

Signature of Agency Head or Agency Head Designee

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

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

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

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





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

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## MD-715 - PART G

### Agency Self-Assessment Checklist

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.1 – The agency issues an effective, up to date EEO policy statement.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.1.a</b>	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	For FY 2024, all required policies were renewed and signed on October 1, 2023. Reissued on June 11, 2024 due to new BEP Director officially installed on March 25, 2024.
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation, and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees:		
<b>A.2. a.1</b>	Anti-harassment policy? [see MD 715, II(A)]	Yes	
<b>A.2. a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website:		



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<b>A.2. b.1</b>	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes	
<b>A.2. b.2</b>	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	
<b>A.2. b.3</b>	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d) (3) (i)] If so, please provide the internet address in the comment's column.	Yes	<a href="https://www.bep.gov/circular-67-13.10">Circular 67-13.10 (bep.gov)</a>
<b>A.2.c</b>	Does the agency inform its employees about the following topics:		
<b>A.2. c.1</b>	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often.	Yes	Employees are informed about the EEO Complaint Process through required in-person and virtual annual training, new employee orientation, new supervisor training, information on posters and TV monitors displayed in common areas and breakrooms throughout the Bureau. Program policies and procedures are shared on the internal and external websites, and Office of Equal Opportunity and Diversity Management (OEODM) bi-monthly virtual office hours.
<b>A.2. c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	Yes	Employees are informed about the ADR process through required annual training, new employee orientation, new supervisor training, informational posters displayed in common areas and breakrooms throughout the Bureau. Program policies and procedures are shared on the internal and external websites and OEODM bi-monthly virtual office hours.
<b>A.2. c.3</b>	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)©] If "yes", please provide how often.	Yes	Employees are informed about the RA process through required annual training, new employee orientation, new supervisor training, informational posters displayed in common areas and breakrooms throughout the Bureau. Program policies and procedures are shared on the internal and external websites and OEODM bi-monthly virtual office hours.



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<b>A.2. c.4</b>	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	Employees are informed about the Anti-Harassment (AHP) process through required annual training, new employee orientation, new supervisor training, informational posters, and TV monitors displayed in common areas and breakrooms throughout the Bureau. Program policies and procedures are shared on the internal and external websites and through OEODM bi-monthly virtual office hours. In FY 2024, BEP also re-deployed Civil Treatment Training and delivered the course to 167 employees and supervisors. BEP also completed the biannual requirement for No Fear Act Training.
<b>A.2. c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Employees are informed about inappropriate behaviors through required annual training, new employee orientation, new supervisor training, informational posters, and TV monitors displayed in common areas and breakrooms throughout the Bureau. Program policies and procedures are shared on the internal and external websites and through OEODM bi-monthly virtual office hours. In FY 2024, BEP also re-deployed Civil Treatment Training and delivered the course to 167 employees and supervisors. BEP also completed the biannual requirement for No Fear Act Training.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	The Bureau has established a performance measure performance measure related to EEO and recognized



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			<p>superior accomplishments through performance assessment and corresponding performance awards. For example, this includes assessment of contributions and support to Treasury and BEP-led special emphasis programs, participation in the EEO initiatives, to include Executive Sponsorship of Special Emphasis and Employee Resource Groups.</p> <p>Additionally, the Bureau's annual BEProud Awards program includes multiple awards recognizing employees who exemplify BEP's core values of integrity, fairness, performance, and respect.</p>
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	
<p style="text-align: center;"><b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION</b></p> <p style="text-align: center;"><b>This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.</b></p>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>As B.1.a</b>	Is the <b>agency head the immediate supervisor</b> of the person ("EEO Director") who has <b>day-to-day control over the EEO office</b> ? [see 29 CFR §1614.102(b)(4)]	No	See Attached status of FY 2024 Part H and FY 2025 plan to meet the measure
<b>B.1. a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	No	See Attached status of FY 2024 Part H and FY 2025 plan to meet the measure
<b>B.1. a.2</b>	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal	Yes	





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	compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]		
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I)] If "yes", please provide the date of the briefing in the comment's column.	Yes	January 30, 2024
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	N/A	Treasury's Office of Civil Rights and Equal Employment Opportunity (OCRE) is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>B.2.d</b>	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	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
<b>B.2.f</b>	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	

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<b>B.2.g</b>	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	N/A	BEP does not have any subordinate level components
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comment's column.	Yes	Strategic Objective 2.2 (Develop Next Family of Manufacturable Banknotes) states that ongoing redesign efforts will permit future currency to better reflect the diversity of our nation. Additionally, BEP's DEIA Strategic Plan has been incorporated into BEP's Strategic Plan under Excellence, Strategic Objective 3.4: Build Workforce of Today and Tomorrow. This objective highlights BEP's commitment to sustaining a work environment where all employees are treated with dignity and respect.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
<b>B.4. a.1</b>	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes	
<b>B.4. a.2</b>	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes	

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<b>B.4. a.3</b>	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	
<b>B.4. a.4</b>	to provide all supervisors and employees with training on the EEO program, including 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 comment's column.	Yes	
<b>B.4. a.5</b>	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	N/A	
<b>B.4. a.6</b>	to publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
<b>B.4. a.7</b>	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes	
<b>B.4. a.8</b>	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes	
<b>B.4. a.9</b>	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
<b>B.4. a.10</b>	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes	
<b>B.4. a.11</b>	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes	
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	







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

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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	BEP does not have component or field offices.
<b>C.1.b</b>	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	BEP does not have component or field offices.
<b>C.1.c</b>	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	BEP does not have component or field offices.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.2.a</b>	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.2. a.1</b>	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
<b>C.2. a.2</b>	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
<b>C.2. a.3</b>	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.2. a.4</b>	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	



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<b>C.2. a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	No	See attached Part H to meet the measure in FY2025.
<b>C.2. a.6</b>	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Yes	
<b>C.2. b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
<b>C.2. b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
<b>C.2. b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	
<b>C.2. b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	
<b>C.2.b.5</b>	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	No	In FY 2024, 86% of RA requests were processed timely. See attached Part H to meet the measure in FY25.
<b>C.2.c</b>	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	
<b>C.2. c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comment's column.	Yes	<a href="#">Circular 67-13.11</a>





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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
<b>C.3. b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes	
<b>C.3. b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes	
<b>C.3. b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	No	See attached Part H to meet the measure in FY25.
<b>C.3. b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.3. b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	No	See attached Part H to meet the measure in FY25.
<b>C.3. b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	Yes	
<b>C.3. b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes	
<b>C.3. b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes	
<b>C.3. b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	No	See attached Part H to meet the measure in FY25.
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	





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





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<b>C.5.b</b>	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	N/A	There was no finding of discrimination in FY 2024.
<b>C.5.c</b>	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	N/A	There was no finding of discrimination or settlement in which a finding was likely in FY 2024.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.	Yes	At least, annually
<b>C.6.b</b>	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	
<b>Essential Element D: PROACTIVE PREVENTION</b>			
<b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.1.a</b>	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
<b>D.1.b</b>	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes	





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<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comment’s column.	Yes	Treasury Entellitrak (ETK) EEO for tracking complaint and alternative dispute resolution data; Treasury RA Tracker for reasonable accommodation; Treasury Data Insight for exit survey results, workforce/applicant flow data, special emphasis reports, internal BEP Anti-Harassment Program (AHP) Tracker for anti-harassment program data; Internal BEP Tracker for ADR; Results from Federal Employee Viewpoint Survey from BEP OHR; Results from New Inclusion Survey; and employees’ feedback directly to OEODM.
 <b>Compliance Indicator</b> 	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>

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<b>Measures</b>			
<b>D.3. a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.3.b</b>	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes	
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d) (4)] Please provide the internet address in the comments.	Yes	<a href="https://www.bep.gov">Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities (bep.gov)</a>
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes	
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	
<b>Essential Element E: EFFICIENCY</b>			
<b>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.</b>			
 <b>Compliance Indicator</b> 	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>





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<b>Measures</b>			
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.





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<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comment's column.	Yes	Although BEP does not utilize contractors to process EEO informal complaints, OCRE contracts the U.S. Postal Services to conduct EEO investigations as a backup for EEO investigations. Contractors are monitored and held accountable by OCRE.
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comment's column.	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>E.2.c</b>	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.



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<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.e</b>	If applicable, are processing time frames 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)	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	





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<b>E.4. a.2</b>	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes	
<b>E.4. a.3</b>	Recruitment activities? [see MD-715, II(E)]	Yes	
<b>E.4. a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes	
<b>E.4. a.5</b>	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	
<b>E.4. a.6</b>	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes	
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.5.a</b>	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Treasury Entellitrak (ETK) for tracking EEO complaint and alternative dispute resolution data; Treasury RA Tracker for reasonable accommodation; Treasury Data Insight for exit survey results, workforce/applicant flow data, special emphasis reports, internal BEP Anti-Harassment Program (AHP) Tracker for anti-harassment program data; internal BEP ADR Tracker; results from Federal Employee Viewpoint Survey from BEP OHR; Treasury’s New Inclusion Survey; and employees’ feedback directly to OEODM.
<b>E.5.b</b>	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Chief, OEODM or designee attends quarterly meetings with other Treasury bureaus and EEOC Directors meetings to share and discuss best practices that BEP can leverage to improve the effectiveness of its EEO Program. Chief, OEODM or designee is an active



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			participant in Interagency ADR working group.
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	
<p style="text-align: center;"><b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b></p> <p style="text-align: center;"><b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b></p>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	
<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes	Indicator moved from E-III Revised
<b>F.2. a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.

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<b>F.2. a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	N/A	No findings in FY 2024.
<b>F.2. a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	N/A	OCRE is responsible for all aspects of the formal complaint process. BEP OEODM staff collaborate with OCRE to ensure timely and effective processing of all cases.
<b>F.2. a.4</b>	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	N/A	No findings in FY 2024.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes	OCRE is responsible for posting overall Treasury No Fear Act Report. This is posted to the Treasury website at: <a href="#">No Fear Act (as amended)   U.S. Department of the Treasury</a>  <a href="#">Bureau of Engraving and Printing No Fear Act Q4 2024</a> BEP's OEODM monitors and tracks to ensure compliance.
<b>F.3.b</b>	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes	OCRE is responsible for posting. This is posted to the Treasury website at: <a href="#">No Fear Act (as amended)   U.S. Department of the Treasury</a>  <a href="#">Bureau of Engraving and Printing No Fear Act Q4 2024</a> BEP's OEODM monitors and tracks to ensure compliance.

EEOC FORM  
*U.S. Equal Employment Opportunity Commission*  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

**MD-715 – Part H-1**  
**Agency EEO Plan to Attain the Essential Elements of a Model EEO Program**

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

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

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
Reporting Structure for the EEO Program	<p>The Chief, Office of the Equal Opportunity and Diversity Management (OEODM) does not report directly to the Bureau of Engraving and Printing (BEP) Director.</p> <p>Chief, OEODM, reports to the Deputy Director (CAO) who is the Agency Head designee for the mission-support programmatic offices.</p> <p>In addition, the Deputy (CAO) is the designated Diversity and Inclusion Officer (DIO) for BEP. This EEO Program structure is aligned with Department of the Treasury's Office of Civil Rights and Equal Employment Opportunity (OCRE) and Office of Minority and Women Inclusion (OMWI).</p>

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
1/23/2023	Engage appropriate stakeholders and establish a plan to comply with the Elijah Cummings Federal Employee Antidiscrimination Act of 2020.	09/30/2024		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Chief, OEODM	Judy Caniban	Yes
Deputy Director, Chief Administrative Officer (CAO) & DIO	Patricia (Marty) Greiner (FY 2024) Craig Deatrick (FY 2025)	No

EEOC FORM  
*U.S. Equal Employment Opportunity Commission*  
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
2/29/2024	Chief, OEODM and the Deputy Director (CAO)/DIO will discuss with BEP Agency Head the EEO Program structure.	Yes		
3/15/2024	Chief, OEODM and the Deputy Director (CAO) will engage with the appropriate Department of the Treasury officials for guidance.	Yes	3/15/2025	
9/30/2024	Implement guidance received after consultation with appropriate leaders and stakeholders or provide appropriate status of compliance.	Yes	9/30/2025	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY 2024	This action plan will continue in FY 2025.



## MD-715 – Part H-2

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

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
E.4.a.4.	<p><i>Does the agency have systems in place to accurately collect, monitor, and analyze the following data:</i></p> <p style="text-align: center;"><i>External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status?</i> [see MD-715, II (E)]</p> <p>BEP receives its applicant flow data from Treasury and Treasury will also have a Part H on this. BEP will track and monitor progress on capturing the applicant flow data and receiving it in a useable form from Treasury officials.</p> <p>In FY 2022, Treasury migrated from Monster Analytics to USA Staffing for vacancy and hiring actions. Throughout the FY, Treasury worked closely with the Enterprise Business Solutions (EBS) and USA Staffing teams to address identified discrepancies. At the end of FY 2022, data errors continued to be identified in applicant flow data.</p> <p>EBS and Office of Personnel Management identified a major change regarding the availability of applicant flow data in Monster Analytics (which was used prior to FY 2022) and USA Staffing – that change being that Monster Analytics would show applicant flow data regardless of whether or not a certificate was audited, whereas USA Staffing will only show applicant flow data if the certificates are marked as “audited.”</p> <p>In FY 2022, Treasury EEO practitioners did not have an efficient and effective way to complete MD-715 Applicant Flow data tables with the format and volume of data in USA Staffing.</p>

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

<b>Date Initiated</b>	<b>Objective</b>	<b>Target Date</b>	<b>Modified Date</b>	<b>Date Completed</b>
11/16/2022	Ensure timely audit of hiring certifications in USA Staffing.	09/30/2024		09/24/2024
11/18/2022	Integrate Applicant Flow data from USA Staffing to Treasury's EDM data warehouse.	09/30/2024	09/30/2025	

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan?</b>
Acting Director, OCRE BEP OEODM Office Chief	Tina Lancaster Judy Caniban	Yes No
Deputy Chief Human Capital Officer	Kimberly Steide	Yes
Program Manager, Information Systems	David Link	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?</b>	<b>Modified Date</b>	<b>Completion Date</b>
11/30/2023	Collaborate with EDM to identify options for supporting EEO Officials and BEP MD-715 Preparers with applicant flow data.	Yes		11/30/2023
01/30/2023	Meet with Treasury Deputy Assistant Secretary for Human Resources (DASHR), Chief Human Capital Officer (CHCO) team to discuss identified discrepancies in USA Staffing.	Yes		03/01/2023
01/30/2023	Meet with Treasury-wide and bureau-level Human Resources Offices (HRO) to discuss the process for auditing certificates in USA Staffing.	Yes		03/21/2023
01/30/2023	Identify an action plan to ensure certificates are audited in USA Staffing.	Yes		03/24/2023

Target Date	Planned Activities	Sufficient Funding & Staffing?	Modified Date	Completion Date
09/30/2024	Transfer applicant flow data from USA Staffing to Treasury data systems.	Yes	09/30/2025	

### Report of Accomplishments

Fiscal Year	Accomplishments
2024	<p><b>Unaudited Certificates:</b> Treasury's OCRE and DASHR-CHCO teams have determined that the percentage of audited certificates should be calculated using the number of "Returned Certificates" as opposed to "Issued Certificates," as certificates cannot be audited until they are returned. Using the new calculation, BEP's percentage of audited certificates was 88.43% as of 09/24/2024, which exceeds the 75% threshold established by Treasury.</p> <p>Prior to receiving updated guidance from OCRE, BEP OHR contacted the Administrative Resources Center (ARC) to understand their process for auditing certificates, and standards for timeliness. ARC also provided common reasons that a certificate audit may be delayed, such as missing documentation, additional time for background checks to be completed, and delays in drug tests or medical examinations being completed.</p> <p><b>Data Extraction:</b> OCRE and EDM continue to collaborate to find more efficient and effective means of pulling Applicant Flow Data (AFD) from USA Staffing. Due to Treasury's size and the volume of AFD annually, it is taking longer than expected to establish AFD data tables in Treasury's data systems.</p> <p>To enable the bureaus to submit AFD for the FY24 MD-715, OCRE and EDM have worked to simplify the process for pulling AFD from USA Staffing and developed a guide providing the bureaus step-by-step guidance on pulling the data and transferring that data to a usable format.</p>
2023	<p><b>Unaudited Certificates:</b> Treasury's OCRE partnered with Treasury's DASHR-CHCO to create an action plan to increase the number of audited certificates in USA Staffing. DASHR-CHCO reiterated the OPM's requirement to audit certificates through reoccurring Human Capital and Bureau HR meetings and collaborated with team members responsible for daily management of hiring certificates to ensure certificates are</p>

	<p>audited. OCRE and DASHR-CHCO continue to meet to discuss improvements and challenges to data availability in USA Staffing.</p> <p>Some bureaus utilize open certificates to continue hiring from one vacancy announcement over an extended period; therefore, OCRE and DASHR-CHCO acknowledge that immediately auditing certificates is likely not possible in all situations.</p> <p>As of October 25, 2023, BEP had 36.32 percent of certificates that were unaudited. Treasury reported that 78.49 percent of Treasury certificates were audited, and that BEP was a bureau with one of the highest rates of unaudited certificates.</p> <p><b>Data Extraction:</b>  In November 2022, OCRE collaborated with Treasury's Enterprise Data Management (EDM) team to identify options for supporting EEO Officials and MD-715 Preparers with obtaining Applicant Flow data in a more usable format. From December 2022 through July 2023, EDM initiated efforts to support EEO Officials and ultimately, EDM and OPM identified a method of transferring Applicant Flow data into Treasury systems.</p> <p>In September 2023, the initial implementation which established the dataflow between USA Staffing and EDM was completed and OCRE provided EDM the requirements for replicating applicant flow data within the MD-715 scope.</p>
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## MD-715 – Part H-3

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

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.3.b.3 C.3.b.5 C.3.b.9	<p>In FY24, the Agency did not require rating officials to evaluate the performance of managers and supervisors on the following activities:</p> <ul style="list-style-type: none"> <li>• Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]</li> <li>• Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]</li> <li>• 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)]</li> </ul>

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

Date Initiated	Objective	Target Date	Modified Date	Date Completed
07/12/2024	Ensure the FY25 performance standards for managers and supervisors include an element regarding ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation.	09/30/2024		07/12/2024
07/12/2024	Ensure the FY25 performance standards for managers and supervisors include an element regarding providing religious accommodations when such accommodations do not cause an undue hardship.	09/30/2024		07/12/2024

08/21/2024	Ensure the FY25 performance standards for managers and supervisors include an element regarding compliance with settlement agreements and orders issued.	09/30/2024		08/22/2024
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#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan?
OEODM Office Chief	Judy Caniban	Yes
OHR Chief	Karnelis (Kay) Godette <i>October 2023 to July 2024</i>	Yes
Acting OHR Chief	Edythe Merced Nicholas <i>July to September 2024</i>	

#### Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Funding & Staffing?	Modified Date	Completion Date
09/30/2024	OEODM develops recommended updates to FY25 performance standards and meets with OHR Specialists to refine draft.	Yes		7/12/2024
09/30/2024	OHR Specialist notifies OEODM that updated performance standards have been provided to ARC for implementation	Yes		8/29/2024

#### Report of Accomplishments

Fiscal Year	Accomplishments
2024	OEODM and OHR successfully collaborated to develop updated performance standards, which BEPs managers and supervisors' performance will be evaluated against in FY25.

## MD-715 – Part H-4

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

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.a.5	<p>BEP established its Anti-Harassment Program (AHP) in FY 2022. BEP also created a cadre of collateral-duty fact finders comprised of BEP managers and supervisors who were trained to conduct inquiries into allegations of harassment per BEP policy and procedures. Since then, the number of allegations of harassment both with and without a protected basis has continued to increase. This trend is not necessarily negative. Instead, it is a validation of the effectiveness of the program and the trust BEP employees placed in the process. However, the increasing number of reported incidents of harassment impacted the timeliness of processing.</p> <p>In FY2024, only 10 percent of harassment allegations were processed per BEP policy, a significant decline from 33 percent in FY 2023, and 100 percent in FY 2022. Some contributing factors to processing delays included:</p> <ul style="list-style-type: none"><li>• Shift schedule and nature of work of witnesses/parties to the allegations made it hard to complete the interviews timely;</li><li>• Number of fact finders;</li><li>• Fact finders' competing priorities;</li><li>• OEODM staff's competing priorities; and</li><li>• Delays when using Treasury's Interagency Agreement with U.S. Postal System.</li></ul>

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

Date Initiated	Objective	Target Date	Modified Date	Date Completed
10/01/2024	Increase timely processing of harassment allegations.	9/30/2025		

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan?</b>
OEODM Office Chief	Judy Caniban	Yes
Anti-Harassment Coordinator	Nancy Danganan	Yes
Management and Program Analyst	Nathaniel Lovdahl	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?</b>	<b>Modified Date</b>	<b>Completion Date</b>
10/30/2024	Utilize new anti-harassment tracker	Yes		
12/30/2024	Review and updates templates	Yes		
01/30/2025	Finalize request to establish a blanket purchase agreement (BPA) and use new contract in support of timely fact-finding	Yes		
01/30/2025	Hold Quarterly Just in Time Training for Factfinders and OEODM staff	Yes		
03/30/2025	Pull processing data on a quarterly basis and assess timeliness of processing. Modify or recalibrate actions, where needed.	Yes		
09/30/2025	Update circular to align with new updates planned by Treasury	Yes		
09/30/2025	Benchmark other agencies for best practices	Yes		



### Report of Accomplishments

Fiscal Year	Accomplishments
<b>2024</b>	<ol style="list-style-type: none"><li>1. Solicited additional members of the cadre and provided training.</li><li>2. Dedicated an EEO Specialist to assist in the AHP processing.</li><li>3. Researched vendors who have good track record in timely and quality inquiries.</li><li>4. Assigned a student intern to assist with administrative requirements, including entering cases into the new Anti-Harassment Tracker.</li><li>5. Updated BEP's Anti-Harassment Policy and Procedures (Circular 67-13.12).</li></ol>

## MD-715 – Part H-5

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

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.b.5	<p>The Bureau of Engraving and Printing's (BEP) goal is to process reasonable accommodation (RA) requests within 20 days unless the processing requires expanded job search or there are extenuating circumstances preventing the completion of processing within 20 days.</p> <p>In FY 2024, the Office of Equal Opportunity and Diversity Management (OEODM) received an unusual number of complex RA requests. Of the 37 requests, 32 were processed within the 20-day goal or 86% timely processed, down from 94% timely processing in FY 2023.</p>

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

Date Initiated	Objective	Target Date	Modified Date	Date Completed
10/01/2024	Timely processing of all RA requests	09/30/2025		

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan?
OEODM Office Chief	Judy Caniban	Yes
OEODM Deputy Chief	Charles Brooks	Yes
OEODM EEO Specialist	Lynette Taylor	Yes

**Planned Activities Toward Completion of Objective**

<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/30/2025	Regular training for OEODM staff processing reasonable accommodation requests	Yes		
09/30/2025	Utilize the established processing checklist	Yes		
09/30/2025	Pull processing data monthly and conduct trends analysis to immediately identify processing issues	Yes		
09/30/2025	Benchmark with other agencies on best practices	Yes		
09/30/2025	Finalize the updates to BEP's RA Procedures (Circular 67-13.10)	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
<b>FY 2024</b>	Updated BEP's RA Policy and Procedures and routed for review and approval.

## FY2024 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 Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A1 and A6	<p>(a) In FY 2024, Hispanic females and White females continue to have significant low participation in the overall BEP workforce when compared to the Civilian Labor Force (CLF).</p> <p>(b) In FY 2024, White females continue to be significantly below the occupational CLF (OCLF) in five of the six mission-critical occupations (MCO).</p> <p>(c) In FY 2024, Hispanic females continue to be significantly below the OCLF in four of the six MCOs.</p>

#### EEO Group(s) Affected by Trigger<sup>1</sup>

EEO Group	Yes/No
All Males	No
All Females	Yes
Hispanic or Latino Males	No
Hispanic or Latino Females	Yes
White Males	No
White Females	Yes
Black or African American Males	No
Black or African American Females	No
Asian Males	No
Asian Females	No
Native Hawaiian or Other Pacific Islander Males	No
Native Hawaiian or Other Pacific Islander Females	No
American Indian or Alaska Native Males	No

<sup>1</sup> Statistically significant cited when participation rate is 0.6 percent or more below the OCLF. Triggers included in statement when group participates significantly below the OCLF in four or more MCOs.

American Indian or Alaska Native Females	No
Two or More Races Males	No
Two or More Races Females	No

## Barrier Analysis Process

Sources of Data	Source Reviewed	Identify Information Collected																					
Workforce Data Tables	Yes	<p><b>Overall Participation of Hispanic Females and White Females in BEP Workforce:</b></p> <p>As of October 30, 2024, the participation rates of Hispanic females and White females in the BEP workforce remain below the CLF. A review of BEP's workforce demographics showed that at the end of FY 2024, 2.26 percent Hispanic females and 6.69 percent White females were present at BEP; these participation rates did not substantially change since FY 2023.</p> <p>It is noted that there was a significant increase in both groups in FY 2023. Notwithstanding increases in their participation rates in FY 2023 and FY 2024, when compared to the previous fiscal years, both Hispanic females (2.26) and White females (6.69) continued to show lower rates when compared to their availability in the CLF of 6.16 percent and 31.82 percent, respectively. (See Table 1).</p> <p>Table 1: Overall Participation Rates</p> <table> <tr> <th>Workforce</th><th>Hispanic Female</th><th>White Female</th></tr> <tr> <td>CLF</td><td>6.16<sup>2</sup></td><td>31.82<sup>3</sup></td></tr> <tr> <td>FY 2020</td><td>1.72</td><td>5.89</td></tr> <tr> <td>FY 2021</td><td>1.85</td><td>6.13</td></tr> <tr> <td>FY 2022</td><td>1.78</td><td>5.97</td></tr> <tr> <td>FY 2023</td><td>2.20</td><td>6.56</td></tr> <tr> <td>FY 2024</td><td>2.26</td><td>6.69</td></tr> </table> <p>In addition to While Hispanic Females and White females, the Department of the Treasury (Treasury) requested investigation into two additional groups:</p> <ul style="list-style-type: none"> <li>Black females in the Senior Executive Service (SES).</li> <li>Hispanic females in Science, Technology, Engineering, and Math (STEM) positions.</li> </ul> <p>BEP is aware that there is a trigger for Hispanic females in STEM occupations and will continue to include in our FY 2025 barrier analysis efforts.</p> <p><b>New Hires vs. CLF</b></p> <p>Of the new hires in FY 2024, 11.76 percent were White females. Although this rate was consistent with the previous years, it remained</p>	Workforce	Hispanic Female	White Female	CLF	6.16 <sup>2</sup>	31.82 <sup>3</sup>	FY 2020	1.72	5.89	FY 2021	1.85	6.13	FY 2022	1.78	5.97	FY 2023	2.20	6.56	FY 2024	2.26	6.69
Workforce	Hispanic Female	White Female																					
CLF	6.16 <sup>2</sup>	31.82 <sup>3</sup>																					
FY 2020	1.72	5.89																					
FY 2021	1.85	6.13																					
FY 2022	1.78	5.97																					
FY 2023	2.20	6.56																					
FY 2024	2.26	6.69																					

<sup>2</sup> Based on the current CLF (2014-2018), availability of Hispanic females has significantly increased at 6.16 percent from 4.79 percent under CLF 2010.

<sup>3</sup> Availability of White females has declined from 34.03 percent to 31.82 percent based on CLF 2014-2018.

significantly below the CLF. Hispanic females account for 3.17 percent of the new hires this reporting period. It is noted that there was a significant decrease from FY 2023, although notably higher than FY 2022 and FY 2021 new hire rates. (See Table 2).

Table 2: Hispanic Females and White Females New Hires

New Hires	Hispanic Females	White Females
CLF	6.16	31.82
FY 2020	5.06	12.03
FY 2021	1.52	11.11
FY 2022	1.32	8.33
FY 2023	6.35	11.11
FY 2024	3.17	11.76

#### New Hires vs Separation

In FY 2024, Hispanic females new hire rate slightly outpaced their separation rate. Specifically, in FY 2020, FY 2021, FY 2023, the rates for newly hired Hispanic females were higher than the rate they were separating from BEP. In FY 2024, even though the percentage of this group separating (3.31) was higher than their onboarding (3.17), the number of hires (seven) was more than the number of employees who separated from BEP (six). The White female group had favorable variances by both measures. Specifically, like Hispanic females, in FY 2020, FY 2021, FY 2023, the White female group experienced higher percentages in new hires when compared to their separate rates. In addition, in FY 2024, 26 White females were hired and 20 separated, and this group accounted for 11.76 percent of new hires, and 11.05 percent of separations. (See Table 3).

Table 3: New Hires vs Separation

Groups	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
RCLF <sup>4</sup>	5.06	1.52	1.32	6.35	3.17
Hispanic Females Separation	2.42	0	2.52	2.87	3.31
RCLF	12.03	11.11	8.38	11.11	11.76
White Females Separation	7.26	5.84	10.69	5.17	11.05

#### Mission-Critical Occupations (MCOs):

Job series 6941 (Bulk Money Handling) and 4406 (Letter Press Operator), were the two most populous in FY 2024, at 198 and 228, respectively, and two of the MCOs at BEP. In addition to these two MCOs, BEP has also designated 0083 (Police Officer), 2210 (Information Technology Management), 2606 (Electronic Industrial Controls Mechanic), and 4454 (Intaglio Press Operating), as mission

<sup>4</sup> The Relevant CLF (RCLF) for analysis purposes is the new hire rate.

critical.

It is also noted that White males continued to be significantly below the OCLF in three of the six MCOs, and slightly below the OCLF in a fourth MCO. While this group's overall participation in MCOs is not considered a significant trigger at this time, OEODM will continue to monitor trends in this area.

As shown below in *Table 4*, in FY 2024, except for MCO 6941, Hispanic females and White females participation rates were below the MCOs when compared to their availability in the OCLF.

Table 4: Participation in Mission Critical Occupations<sup>5</sup>

FY 2024 MCO	Hispanic Female	White Female
OCLF	2.40	7.60
0083 POLICE OFFICER	1.05	3.14
OCLF	1.60	21.60
2210 INFORMATION TECHNOLOGY	1.08	8.60
OCLF	0.60	3.00
2606 ELCTRONIC INDUSTRIAL CONTROLS MECHANIC	0.00	1.92
OCLF	3.50	17.90
4406 LETTER PRESS OPERATOR	0.44	0.88
OCLF	3.50	17.90
4454 INTAGLIO PRESS OPERATING	0.78	0.00
OCLF	2.78	4.50
6941 BULK MONEY HANDLING	4.55	5.05

**New Hires by MCO:**

*Table 5* shows that in FY 2024, there were no Hispanic females hired in five of the six MCOs, and no White females hired in four of the MCOs. However, for Hispanic females in the MCO where there were some hires (6941), their participation rate exceeded their availability in the OCLF. For White females in the MCOs where there were hires, in the 0083 series, White females still participated below their availability in the OCLF, while in 2606 series, like the Hispanic females, the new hire rate exceeded their availability in the OCLF.

<sup>5</sup> Except for 0083 White females and 2210 Hispanic females, White females and Hispanic females saw an increase in their availability rate based on the current OCLF (2014-2018), compared to the previous CLF 2010.

Table 5: New Hires by MCO

MCO	Hispanic Females	White Females
0083 Police Officer	0	5.00
OCLF	2.40	7.60
2210 INFORMATION TECHNOLOGY	0	0
OCLF	1.60	21.60
2606 ELECTRONIC INDUSTRIAL CONTROLS MECHANIC	0	9.09
OCLF	0.60	3.00
4406 LETTER PRESS OPERATOR	0	0
OCLF	3.50	17.90
4454 INTAGLIO PRESS OPERATING	0	0
OCLF	3.50	17.90
6941 BULK MONEY HANDLING	9.68	0
OCLF	1.20	4.50

Based on the Treasury's request, we reviewed the participation rates of the following groups:

- Black females in the Senior Executive Service (SES).
- Hispanic females in STEM positions.

#### Senior Leadership and Pipeline

Candidates for SES positions are generally selected from the GS14 or GS15 levels. When EEO groups participate in the feeder pools (GS14 and GS15 grades) at rates similar to the benchmark but there are not similar participation rates in the SES, a trigger may exist.

In FY 2024, 0.58 percent (11) of the BEP workforce were at the SES level. White males had a robust presence at 45.45 percent at this level when compared to other groups. White females were at 18.18 percent and 9.09 percent each for Hispanic males, Black males, Black females, and Asian males. All other groups were not present.

The trend at the GS-15 aligned with the presence of the groups at the SES grade level. At BEP, 2.0 percent or 36 were at the GS-15 grade level in FY 2024. Of the 36, 16 or 44.44 percent were White males, followed by Black males at eight or 22.22 percent, White females, and Black females at five or 13.89 percent each, and Hispanic males and Asian females at one or 2.78 percent each. Other groups were not present.

There are multiple triggers at the SES grade level including Black females. We will continue to review all available information, including BEP's recruitment and hiring practices, to determine if there are barriers preventing certain groups, including Black females from full



participation at the SES and GS-15 grade levels. (See Table 6).

Table 6: SES and Pipeline Grade Levels

Senior & Pipeline Grades	Male	Female	HM	HF	WM	WF	BM	BF	AM	AF
GS 14	66.18	33.82	5.31	1.93	33.33	13.53	16.91	14.49	8.21	3.38
GS 15	69.44	30.56	2.78	0	44.44	13.89	22.22	13.89	0	2.78
SES	72.83	27.27	9.09	0	45.45	18.18	9.09	9.09	9.09	0

### Hispanic Females in STEM Occupations

The top five most populous STEM occupations at BEP in FY 2024, were Information Technology (2210), General Engineering (0801), Contracting (1102), General Physical Sciences (1301), and Chemistry (1320). (See Table 7).

Table 7: STEM Occupation Series at BEP

Occ Series Code	Occ Series Description	Positions at BEP
0028	Environmental Protection Specialist	4
<b>0801</b>	<b>General Engineering</b>	<b>56</b>
0808	Architecture	1
0810	Civil Engineering	1
0819	Environmental Engineering	1
0830	Mechanical Engineering	6
0850	Electrical Engineering	4
0896	Industrial Engineering	1
<b>1102</b>	<b>Contracting</b>	<b>53</b>
1301	<b>General Physical Sciences</b>	<b>40</b>
1320	<b>Chemistry</b>	<b>31</b>
1515	Operations Research	3
<b>2210</b>	<b>Information Technology Management</b>	<b>94</b>

BEP data show that except for 1102, Hispanic females have robust participation in all other four most populous STEM occupations when compared to their availability in the OCLF. (See Table 8).

Table 8<sup>6</sup>: Participation of Hispanic Females in BEP's Top STEM Occupations

<sup>6</sup> Table 8 Source: Data Insight report Workforce by ERI and Gender within Specified Occupational Series, as of pay period ending November 16, 2024. Because this report could not be backdated to display FY 2024 data, some participation rates vary from table A6.

		STEM	Hispanic Females
		2210 INFORMATION TECHNOLOGY	2.13
		OCLF	<b>1.60</b>
		0801 GENERAL ENGINEERING	5.36
		OCLF	0.99
		1102 CONTRACTING	0.0
		OCLF	4.6
		1301 GENERAL PHYSICAL SCIENCES	5.0
		OCLF	2.81
		1320 CHEMISTRY	6.45
		OCLF	2.39
		Analyzing the participation of Hispanic females in the BEP STEM occupations will continue in FY 2025.	

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## Status of Barrier Analysis Process

Sources of Data	Source Reviewed	Identify Information Collected
Complaint Data (Trends)	Yes	There were no trends noted specific to Hispanic females or White females.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)		Findings: No findings in FY 2024.
Climate Assessment Survey (e.g., FEVS)	Yes	<p>Reviewed the Treasury Inclusion Survey results. FEVS is of limited value because the data is provided to BEP by the organizational hierarchy and not with a breakdown by ethnicity, race, gender, and disability.</p> <p>On all measures except Cooperative, BEP ratings decreased in 2024 compared to 2023. The Treasury provided Bureau-wide results broken down by Directorate, but not by demographic groups; demographic data was reported at the Treasury level. At the Treasury level, White employees rated overall workplace characteristics at 75%, which is higher than all other groups except for Asians (the threshold set by the Office of Personnel Management (OPM) is 65%). Hispanic employees rated the overall workplace at 68% and exceeded the threshold for all measures except for Fair.</p>
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	Review of 462 report is in progress.
Other (Please Describe)	Yes	Position Descriptions (PD) were reviewed by BEP's Barrier Analysis Team (BAT), to identify additional triggers for analysis.

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Barrier Analysis Process Completed?	<b>Barrier(s) Identified? (Yes or No)</b>
No	Ongoing Efforts

**Statement of Identified Barrier(s)**

In FY 2024, preliminary findings by the BEP Barrier Analysis (BA) Team results in the following potential issues contributing to BEP having some low participation areas, specifically Hispanic females, and White females:

- Additional condition of employment in the 0083 series, but not necessarily a requirement reflected in the position description (PD) or within the OPM classification standard.
- A limited applicant pool for some types of Manufacturing positions.
- Limited career ladder opportunities in certain job series, including 2210 and 0801.
- Some PDs contain inaccurate essential job functions that may result in job postings with inaccurate information or job requirements.

In FY 2023, the BA Team determined:

- BEP has no written strategic outreach and recruitment plan specific to individual MCOs.
- BEP needs to market BEP's brand and MCO positions.
- BEP Need to investigate whether there are additional qualification requirements that may be unnecessary, and potentially screening out qualified candidates.

While we can conclusively identify triggers that suggest potential barriers in outreach and recruitment specific to Hispanic females and White females, BEP cannot pinpoint specific barriers without conducting a more thorough analysis necessary to understand the conditions affecting full participation by both groups in the BEP workforce. Efforts to pinpoint barriers are ongoing.

BEP will also investigate the participation of Black females in the SES and Hispanic Females in STEM occupations.

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

Objective	Date Initiated	Target Date	Sufficient Funding & Staffing	Modified Date	Date Completed
<p>To determine what, if any, barriers within BEP that impact opportunities for Hispanic females and White females throughout the entire employment cycle.</p> <p>BEP recognizes the low participation of WM in some MCOs. We will continue to include this in our analysis in FY</p>	01/1/2022	9/30/2023	Yes	09/30/2025	

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**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan?
Chief, Office of Equal Opportunity and Diversity Management	Judy Caniban	Yes
Chief, Office of Human Resources	Karnelis (Kay) Godette <i>October 2023 to July 2024</i>	Yes
Acting Chief, Office of Human Resources	Edythe Merced Nicholas <i>July to September 2024</i>	
	Douglas Schott (FY 2025)	

**Planned Activities Toward Completion of Objective**

Target Date	Planned Activities	Modified Date	Completion Date
09/30/2023	BEP has adjusted the planned activities for FY 2025, to align with Treasury guidance.	09/30/2025	

**Report of Accomplishments**

Fiscal Year	Accomplishments
<b>2024</b>	<p><b>BEP's Barrier Analysis Team accomplished the following in FY 2024:</b></p> <ul style="list-style-type: none"> <li>Held approximately 24 biweekly meetings and received refresher training on the Barrier Analysis process.</li> <li>Developed and presented a brief to BEP's Senior Executive Team (SET), on their FY 2024 action plans for the year:</li> <li>Stood up four MCO Working Groups, comprising hiring managers, Employee Resource Group (ERG) leaders, the Office of Human Resources (OHR) subject matter experts and the Office of Equal Opportunity and Diversity Management (OEODM) Advisors. BA Team membership grew from approximately fifteen members to over fifty in FY 2024.</li> <li>Reviewed 38 PDs for the six MCOs reported above, as well as the following series, to pinpoint barriers to participation:</li> </ul>

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- 0800- Security Administration
- 0801- General Engineering
- 4401- General Printing
- Developed a barrier analysis tool, comprising a ten-point questionnaire and “5 Whys” analysis, to assist with the review of the PDs.
- Evaluated the initial findings against OPM qualification standards, the Treasury policies, and BEP practices and procedures to determine if the PDs contain potentially unnecessary requirements, that may result in qualified individuals screening themselves out from opportunities at BEP.
- FY 2024 results:
  - The groups identified 123 triggers, including:
    - PDs containing training requirements not found in the OPM Qualification Standard.
    - PDs having inconsistent target grades across BEP sites.
    - PDs not being built with Career Ladder as a possibility, when the position should have a Career Ladder option.
  - Utilizing the triggers and other available information, the groups identified the following areas for further analysis:
    - Additional condition of employment in the 0083 series, but not necessarily a requirement reflected in the position description (PD) or within the OPM classification standard.
    - A limited applicant pool for some types of Manufacturing positions.
    - Limited career ladder opportunities in certain job series, including 2210 and 0801.
    - Some PDs contain inaccurate essential job functions that may result in job postings with inaccurate information or job requirements.
- In response to the initial assessment listed below at the end of FY 2023, the BA Team accomplished the following:
  - No written strategic outreach and recruitment plan specific to individual MCOs.
    - In FY 2024, OHR drafted the FY25-27 Outreach and Recruitment plan, which includes outreach plan targeting low participation areas. In FY 2025, OHR will conduct a hiring manager survey to establish hiring needs and follow up with hiring managers to develop focused outreach and recruitment plans.
  - Need to market BEP’s brand and MCO positions.
    - OHR created BEP specific jobs page on USA Jobs at: <https://bep.usajobs.gov/>
    - OHR continued use of marketing and educational materials to educate employees and prospective applicants about BEP careers and advancement opportunities.
    - OHR continues to partner with BEP Office of External Relations (OEX) to collaborate on social media platforms and methods to advertise BEP employment opportunities to a broader audience, to include videos and photos on the BEP website and on USAJobs.
    - OHR deployed a survey for career fair attendees to assess the effectiveness of career fair attendance and recruitment efforts.
  - Need to investigate whether there are additional qualification requirements that may be unnecessary, and potentially screening out qualified candidates.

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- See accomplishment above responding to this FY 2023 finding.

**Professional Memberships:**

- BEP purchased 13 professional memberships in FY 2024 to assist in focusing recruitment and outreach to Women in Law Enforcement; Lesbian, Gay, Bisexual, Transgender, Queer, Plus (LGBTQ+) Professionals; Hispanic/Latino Professionals; Women in STEM; Women in Manufacturing, and people with disabilities.
- OHR utilized feedback and data from barrier analysis team in identifying professional memberships to obtain.

**BEP Job Fair:**

- In addition to the job fair BEP held in August 2023 at the Washington D.C. facility, BEP held another job fair in our Western Currency Facility in April 2024.

**Career Fairs:**

- Participated virtually in Bender's Diversity & Inclusion Career Fair, two career fairs hosted by Women in Manufacturing, Career Echo's Historically Black Colleges and Universities (HBCU) & Minority Serving Institutions (MSI) Virtual Career & Grad School Fair, and Career Echo's Diversity & Inclusion Career Fair.
- Participated in Montgomery County Schools' Annual HBCU College Fair, and career fairs hosted by Dallas Diversity Group, Women in Federal Law Enforcement, and the Federal Asian Pacific American Council.
- Participated in the Hispanic Serving Institutions Summit hosted by the Federal Aviation Administration in Washington, DC.

**BEP Intern Scholars Program:**

- In FY 2024, BEP onboarded nine of ten selected paid interns via the Scholars Intern Program. All students came from minority servicing institutions.
- BEP utilized 70 percent of the funded 4800 hours.

**Workforce Demographics Dashboard:**

- OEODM and Chief Information Officer (CIO) continued to refine the dashboard and expand its capabilities as a barrier analysis tool.
- The Dashboard provides visualizations of current and historical workforce demographics (to include race, national origin, gender, disability status, and Veteran status) across multiple aspects of employment:
  - Current onboard population
  - New hires
  - Separations
  - Participation in MCOs
  - Supervisory status
  - Participation in the SES

**Partnerships and Collaboration:**

- OEODM and OHR continued to partner to execute critical actions under BEP's Strategic Goal (Excellence) and Strategic Initiative (Build our Workforce Today and Tomorrow)
- OEODM and OHR staff met bi-weekly to discuss and conduct analysis in the areas of outreach and recruitment, workforce development, and performance awards.

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	<ul style="list-style-type: none"> <li>Continued collaboration between OEODM and the Office of Enterprise Solutions to establish the workforce demographics dashboard.</li> </ul>
2023	<p><b><u>BEP's Barrier Analysis Team:</u></b></p> <ul style="list-style-type: none"> <li>In FY 2023, BEP established its first Barrier Analysis Team. <ul style="list-style-type: none"> <li>Members include hiring managers from both facilities (DC and Texas) in the Offices of Security, Currency Manufacturing, Engraving, Production Engineering, Quality Engineering and Management, and Enterprise Solutions (OES). Supporting this effort are staff from OHR and OEODM.</li> <li>The Associate Director (Manufacturing) DCF as the Executive Champion for the team</li> <li>Team continues to meet bi-weekly since March 2023.</li> <li>Team received training on barrier analysis, Human Resources (HR) Recruitment Process, Strategic Conversations, briefing on BEP OHR's outreach and recruitment efforts and benefits of the outreach and recruitment events, and training on Equal Employment Opportunity Commission (EEOC) Root Cause Analysis Tool (Recruitment/Outreach).</li> <li>Team reviewed workforce/applicant flow data – overall BEP, by Directorate and mission critical occupations.</li> <li>Results to date: <ul style="list-style-type: none"> <li>BEP's Barrier Analysis Team utilized EEOC's root cause analysis tool to assess BEP's outreach and recruitment specific to Mission Critical Occupations (MCOs).</li> <li>Common triggers found by team members who completed the root cause analysis were as follows: <ul style="list-style-type: none"> <li>No written strategic outreach and recruitment plan specific to individual MCOs.</li> <li>Need to market BEP's brand and MCO positions.</li> <li>Need to investigate whether there are additional qualification requirements that may be unnecessary, and potentially screening out qualified candidates.</li> </ul> </li> </ul> </li> <li>Established short/long term goals: <ul style="list-style-type: none"> <li>Short Term (FY 2024) <ul style="list-style-type: none"> <li>Brief Senior Executive Team</li> <li>Continue data and barrier analysis</li> <li>Transition to Step 2 (of EEOC's Barrier Analysis Flowchart) – Investigate (pinpoint barriers)</li> <li>Training on interviewing for hiring officials</li> <li>Assess effectiveness of marketing and outreach efforts</li> <li>Develop Occupational Strategic Recruitment Plan – MCOs</li> </ul> </li> <li>Long Term (FY 2025 – 2026) <ul style="list-style-type: none"> <li>Engage all BEP organizations (beyond MCOs)</li> </ul> </li> </ul> </li> </ul> <p><b><u>Professional Memberships:</u></b></p> <ul style="list-style-type: none"> <li>BEP purchased nine professional memberships in FY 2023 to assist in focusing recruitment and outreach to Women in Law Enforcement, LGBTQ+ Professionals, Hispanic/Latino Professionals, Women in STEM, and people with disabilities.</li> </ul> <p><b><u>Career Fairs:</u></b></p> </li></ul>



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- Participated virtually in the Federal Asian Pacific American Career Fair, Montgomery College, MD.
- Participated in the Women in Manufacturing (WiM) Summit and hosted some WiM members at BEP for a tour of the facility.
- Attendance at several career fairs to connect with potential candidates from a variety of organizations and attract a pool of applicants from all segments of society. Attended the Bender Disability Job Fair, the Women in Federal Law Enforcement (WIFLE) national conference, several smaller law enforcement conferences and veteran job fairs and events.
- Researched and partnered with several professional membership organizations to attract more job candidates from underserved populations.
- Attended several career and college fairs to promote BEP's brand and job opportunities to a variety of populations.
- Finalizing a survey for career fair attendees to assess the effectiveness of career fair attendance and recruitment efforts.

**Social Media Presence:**

- Explored and exploited appropriate social media platforms (e.g., Twitter, LinkedIn, etc.) as a source to recruit prospective candidates and another way to promote BEP as the "Employer of Choice."
- Enhanced online presence and adapt brand to engage and attract digital talent through marketing materials, post testimonials from employees at varying career levels and occupations, and/or create blogs/newsletters, etc.
- Partnering with BEP Office of External Relations (OEX) to collaborate on social media platforms and methods to advertise BEP employment opportunities to a broader audience, to include videos and photos on the BEP website and USAJobs.

**BEP Job Fair:**

- BEP held its first Career Fair since before COVID in September 2023.
- It was successful in highlighting current job openings and inviting both BEP employees and non-BEP employees to explore options.
- OEODM had a table and shared information on the demographics of the workforce.

**BEP Intern Scholars Program:**

- BEP continued partnerships with minority-serving institutions that (a) create pathways to careers for high school and college students from all segments of society and positions graduates to advance in their career; and (b) provides immersive internship and academic seminars to students from hundreds of colleges and university and young professionals from across the U.S. and more than 25 countries.
- In FY 2024, BEP selected ten selected paid interns via the Scholars Intern Program, a significant increase in utilization of total 4800 hours compared to FY 2023 and FY 2022.

**Workforce Demographics Dashboard:**

- Established dashboard as another tool for barrier analysis purposes.

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**Partnerships and Collaboration:**

- OEODM and OHR continued to work on partnership by meeting to discuss and conduct analysis in the areas of outreach and recruitment, workforce development, and performance awards. Meetings were held on a bi-weekly basis throughout the year and were directed by actions aligning to BEP's strategic goals and strategic initiatives.
- Collaborated with OES to establish the Workforce Demographics Dashboard.

## FY2024 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), the Equal Employment Opportunity Commission (EEOC) regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

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

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

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

- |                                |           |
|--------------------------------|-----------|
| a. Cluster GS-1 to GS-10 (PWD) | <b>No</b> |
| b. Cluster GS-11 to SES (PWD)  | <b>No</b> |

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) | <b>Yes</b> |
| b. Cluster GS-11 to SES (PWTD)  | <b>No</b>  |

In FY 2024, 0.94 percent of the GS-1 to GS-10 permanent workforce was PWTD.

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

In FY 2024, specific data regarding PWTD and PWD goals were included in directorate briefings and recruitment, hiring, and outreach touchpoint sessions. This information is also included in the recruitment and outreach plan for the Bureau of Engraving and Printing (BEP). For the last fiscal years, BEP has always exceeded the 2.00 percent Federal goals for PWTD. However, in FY 2024, BEP data show PWTD is below the 2percent Federal goal. In addition to focusing on retaining and advancing PWTD and PWD employees in FY 2025, BEP will also investigate what caused the low participation of PWTD in the GS-11 to SES grade levels.

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## Section II: Model Disability Program

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

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

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

The Office of Equal Opportunity and Diversity Management (OEODM) is responsible for the implementation and execution of the requirements for the Disability Program. OEODM Chief required OEODM staff to regularly attend appropriate training and webinars to understand their responsibilities and be able to execute their responsibilities timely and effectively. Furthermore, OEODM worked closely with the Office of Human Resources (OHR) to continually evaluate BEP policies, processes and procedures and assess if there were barriers that prevent PWTD and PWD from fully participating in the BEP workforce and/or effective implementation of BEP’s Disability Program requirements.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWTD and PWD	7			Karnelis Godette, Chief Office of Human Resources <i>October 2023 to July 2024</i>  Edythe Merced Nicholas, Acting Chief Office of Human Resources <a href="mailto:edythe.nicholas@bep.gov">edythe.nicholas@bep.gov</a> <i>July to September 2024</i>
Answering questions from the public about hiring authorities that			11	Karnelis Godette, Chief Office of Human Resources  Edythe Merced Nicholas, Acting Chief

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take disability into account				Office of Human Resources (FY 2024) <a href="mailto:edythe.nicholas@bep.gov">edythe.nicholas@bep.gov</a>
Processing reasonable accommodation requests from applicants and employees	1	2		Judy Caniban, Chief Office of Equal Employment and Diversity Management <a href="mailto:Judy.Caniban@bep.gov">Judy.Caniban@bep.gov</a>
Section 508 Compliance			2 (Plus 5 full-time contractors completing remediation)	Sharilyn Cook, Manager Office of Enterprise Solutions <a href="mailto:Sharilyn.Cook@bep.gov">Sharilyn.Cook@bep.gov</a>
Architectural Barriers Act Compliance			1	Daniel Carver, Chief Office of Facilities Support  James Lucas, Acting Chief Office of Facilities Support (FY 2025)
Special Emphasis Program for PWD and PWTD			1	Judy Caniban, Chief Office of Equal Employment and Diversity Management <a href="mailto:Judy.Caniban@bep.gov">Judy.Caniban@bep.gov</a>

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

OEODM staff responsible for processing and managing the Disability Program at BEP received sufficient training from the Equal Employment Opportunity Commission (EEOC), Department of the Treasury (Treasury), and other sources. OEODM staff also were given opportunity to develop their competencies relevant to managing and processing the Disability Program requirements during OEODM team collaboration. Furthermore, OEODM provided staff with access to CyberFeds for research purposes on appropriate processing and managing of the Disability Program. OEODM utilized Job Accommodation Network (JAN) website on a regular basis to research regarding medical conditions and/or recommended accommodation.

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

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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.**

### 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.

OHR manages an internal Schedule A repository to track, maintain, and identify qualified Schedule A applications that BEP receives. BEP also partnered with the Treasury and USA Jobs to create a customized job search tool that provides veterans services such as, a federal resume tutorial, and workshops on navigating USA Jobs and interviewing techniques.

OHR established an additional Outreach Coordinator position, which will increase OHR’s capacity to support outreach and recruitment efforts; position will be filled in FY 2025. In FY 2024, BEP participated in three recruitment events specific to veterans, which were another potential source for PWTD and PWD. The paramount objective with BEP’s increased capacity was to plan, identify, and implement changes that will improve opportunities for all groups within the workforce, including PWTD and PWD.

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

The hiring authorities that BEP utilized specific to PWTD and PWD were Schedule A and veteran appointment authorities, to include Veterans Readjustment Authority (VRA) and Veterans Employment Opportunity Act (VEOA). Schedule A is available for use along with the VRA and VEOA to appoint PWTD, PWD and veterans or those with a service-connected disability. Hiring officials consulted with OHR before every recruit request for competitive hiring. In addition, Bureau of the Fiscal Service’s Administrative Resources Center (ARC), which is BEP’s servicing human resources office, always included the discussion about special hiring authorities specific to PWTD, PWD and Veterans during strategic discussions before advertising BEP vacancies. The various available hiring authorities to include VRA, VEOA, Schedule A, etc., were also

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communicated to hiring managers during monthly meeting between managers, supervisors and OHR.

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.

In FY 2024, when BEP received applications for positions under the Schedule A hiring authority, the servicing OHR Specialist reviewed the submission and determined if the applicant met qualifications or position requirements and submitted the required medical documentation. Applicants deemed qualified were referred to the hiring official non-competitively with guidance on selection procedures, including the application of veterans' preference, where applicable. Hiring officials had the option to interview and/or hire the candidate or to consider other candidates from issued certificates (e.g., Merit Promotion, Non-Competitive, etc.).

Alternatively, when individuals submitted their resumes directly to BEP Special Placement Program Coordinator (SPPC) for vacant positions, the SPPC referred the resumes to the designated servicing OHR Specialist upon request from a hiring manager. The OHR Specialist then reviewed the resumes and determined qualifications and eligibility. If qualifications and Schedule A eligibility were met, the resumes were then forwarded to the hiring manager for consideration, with guidance on selection procedures, including the application of veterans' preference, when applicable. In addition, any time BEP managers signified intent to hire a Schedule A candidate, OHR reviewed current available resumes, identified who were eligible for Schedule A appointment and referred for consideration.

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

BEP OHR mandated a Recruitment Planning Discussion for all hiring officials prior to submission of a recruitment request, whereby hiring flexibilities and authorities (including Schedule A and Veterans appointments) were discussed and highly recommended. BEP OHR also hosted Monthly Human Resources Update Meetings to provide supervisors and managers ongoing education and updates on topics such as Schedule A, Pathways programs, Prohibited Personnel Practices, career development, EEO-related training opportunities, and retention. In addition, Treasury required all Treasury employees to complete mandatory VEOA and VRA training.

## **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.

BEP has established a working relationship with the interpreting service providers to provide interpreting services to employees and applicants with disabilities. BEP utilized Handshake to advertise open vacancies at educational institutions that included programs for students with disabilities. In FY 2024, BEP held memberships with two professional organizations, with a focus on employment of PWTD and PWD, Association of People Supporting Employment First (APSE) and the Association for the Severely Handicapped (TASH). As previously reported, BEP also conducted outreach and recruitment events specific to veterans, a potential source of PWTD and PWD candidates.

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

1. Using the goals of 12% for PWD and 2 percent 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. PWD  | No |
| b. PWTD | No |

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

- |         |     |
|---------|-----|
| a. PWD  | Yes |
| b. PWTD | Yes |

PWD trigger was identified for the following MCOs. The new hires referred rate for Letterpress Operating – 4406 **(3.08 percent)** & Bulk Money Handling – 6941 **(1.03 percent)** is less than expected compared to the new hires qualified rate of **(5.62 percent)** & **(5.12 percent)**. New hires selected rate for Police – 0083 **(0.00 percent)** Electronic Industrial Controls Mechanic – 2606 **(0.00 percent)** Letterpress Operating – 4406 **(0.00 percent)** & Bulk Money Handling – 6941 **(0.00 percent)** is less than expected compared to the new hires qualified rate.

PWTD triggers were identified in the following MCOs. The new hires referred rate for Letterpress Operating – 4406 **(0.00 percent)** is less than expected compared to the new hires qualified rate of **(2.25 percent)**. New hires selected rate for Information Technology Management – 2210 **(0.00 percent)**, Electronic Industrial Controls



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Mechanic – 2606 **(0.00 percent)** Letterpress Operating – 4406 **(0.00 percent)** & Bulk Money Handling – 6941 **(0.00 percent)** is less than expected compared to the new hires qualified rate.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal*<sup>1</sup> applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

- |         |     |
|---------|-----|
| a. PWD  | Yes |
| b. PWTD | Yes |

PWD trigger was identified for the following MCOs. The internal qualified rate for Letterpress Operating – 4406 **(0.00 percent)** & Intaglio Press Operating – 4454 **(6.06 percent)** is less than expected compared to the relevant applicant pool rates of **(4.35 percent & 9.46 percent)**.

PWTD triggers were identified in the following MCOs. The internal qualified rate for Police – 0083 **(0.69 percent)** & Letterpress Operating – 4406 **(0.00 percent)** is less than expected compared to the relevant applicant pool rates of **(4.17 percent & 2.17 percent)**.

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. PWD  | Yes |
| b. PWTD | Yes |

PWD trigger was identified for the following MCOs. The internal competitive promotion referred rate for Information Technology Management – 2210 **(10.00 percent)** is less than expected when compared to the qualified applicant pool rate of **(13.55 percent)**. The internal competitive promotion selection rates for Police – 0083 **(0.00 percent)** Information Technology Management – 2210 **(0.00 percent)** Electronic Industrial Controls Mechanic – 2606 **(0.00 percent)** and Intaglio Press Operating – 4454 **(0.00 percent)** is less than expected when compared to the qualified applicant pool rates.

PWTD trigger was identified for the following MCOs. The internal competitive promotion referred rate for Intaglio Press Operating – 4454 **(0.00 percent)** is less than expected when compared to the qualified applicant pool rate of **(3.03 percent)**. The internal

<sup>1</sup> Internal refers to candidates on the competitive and noncompetitive certificates.

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competitive promotion selection rates for Police – 0083 **(0.00 percent)** Information Technology Management – 2210 **(0.00 percent)** Electronic Industrial Controls Mechanic – 2606 **(0.00 percent)** Intaglio Press Operating – 4454 **(0.00 percent)** & Bulk Money Handling – 6941 **(0.00 percent)** is less than expected when compared to the qualified applicant pool rates.

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

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

### A. Advancement Program Plan

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

BEP offers career development opportunities to all employees via non-competitive and competitive details and promotions. The career development opportunities were marketed through internal communications and external sources to all BEP employees, including PWTD and PWD.

### 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 available at BEP:

**Winter Emerging HR Program:** The Emerging HR Leaders forum is a leadership development program for HR employees in grades 9-12s.

**Federal Executive Institute/Leadership for a Democratic Society (FEI/LDS):**

The Leadership for a Democratic Society (LDS) program serves as an enduring foundation for GS-15 and SES employees' personal and professional development. The program offers an unmatched learning experience to prepare senior government leaders for today's complex challenges. There is an internal competitive process and the Senior Executive Team (SET) selects who attends.

**Excellence in Government Fellow (EIG):** The **Excellence in Government Fellows** program is the premier leadership development course for federal employees at the GS-14 to GS-15 levels. EIG has helped federal employees develop strong leadership skills through application-based learning, highly interactive activities,

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authentic self-reflection, personalized coaching and governmentwide networking. Graduates go on to plan, design and implement innovative solutions to address the federal government's biggest challenges and improve their agencies' effectiveness. There is an internal competitive process and the SET selects who attends.

**Electro-Machinist & Mechanical-Machinist Trainee Program.** This program is advertised as a four-year trainee program to journeyman Electro-Machinist. This position is in the Electro-Machine Shop, Office of Security Printing. The incumbent participates in a four-year training program with BEP 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.

**Apprenticeship:** BEP provides technical apprenticeship programs, which combine on-the-job and classroom training with mentoring opportunities to help employees learn the practical and theoretical aspects of highly skilled occupations. The application process for each apprenticeship varies depending on the job series of the position. Positions requiring artistic ability, such as Engraver or Designer positions utilize a two-phase evaluation consisting of an application/questionnaire review and an assessment of the applicant's artwork. Other positions such as Platemakers and Siderographers require an application and questionnaire review.

**Senior Executive Service Candidate Development Program:** Senior leaders at BEP are provided training and development opportunities that are aligned with OPM and the Center for Leadership Development (CLD), including Federal Executive Institute (FEI), Leadership Education and Development Certificate Program (LEAD), Senior Executive Assessment Program, and Department of the Treasury Leadership Development Program (SES) (2017, 2021). These training and development opportunities meet the succession planning needs of BEP and provide employees with training and developmental activities that prepare them for future positions as senior executives at BEP and the Federal Government. BEP provides senior leaders access to training and development courses that employ OPM-designed curriculum aligned with Executive Core Qualifications (ECQs) and an opportunity to realistically assess their performance on ECQs as well as overall readiness for senior executive positions within the Federal Government.

**Treasury Executive Institute (TEI):** TEI is a shared service and strategic partner of BEP that provides cutting-edge and convenient learning and development programs in an interagency setting to equip and transform BEP leaders for greater impact. All programs and services are aligned to ECQs and fundamental leadership competencies. There is no selection process for individual TEI courses. For most courses, employees will just need to submit the Standard Form (SF) 182 in the Integrated Talent Management (ITM) system. The SF-182 is available in ITM and is required for all external learning activities (i.e., non-Treasury or non-ITM courses). Supervisor approval is required.

**Certified Coaching Cadre:** BEP provides coaching instruction through the Federal Internal Coaching Training Program (FICTP), a rigorous, seven-month program that is certified by the International Coach Federation to provide professional-level coach

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training. The program fosters a coaching culture by empowering leaders at all levels to practice self-reflection, creativity in problem solving, accountability, and candid and respectful communication. The aim is to cultivate an environment of continuous learning, individual and organizational performance excellence by promoting positive leadership practices. Through this program, selected participants acquire a thorough understanding of the philosophical, historical, and ethical foundations of professional coaching and how they are applied within the Federal context. This course is offered on an annual basis, though participation is limited. Once BEP announces a call for nominations, employees interested in participating in this program must apply and are competitively selected.

**Onsite Leadership Development Workshops:** These workshops provide leaders at all levels with critical skills needed to maintain and/or improve their leadership skills and effectiveness. There is no competitive selection process. Employees submit SF-182 via ITM as required for desired training. Supervisor approval required.

**Technical Development Programs:** There is no competitive selection process. Employees submit SF-182 via ITM as required for desired training. Supervisor approval required.

**College Course.** Funding of College-Level Training. There is no competitive selection process. The employee submits an SF-182, Form 1707 and completes a CSA, if needed. Supervisor approval is required.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Fellowship Programs	6	6	33.33	33.33	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	2	2	50.00	50.00	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Other Career Development Programs	6	5	33.33	40.00	0	0

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

BEP does not currently track the disability status of applicants and/or selectees. We will continue to work on a plan to successfully capture the applicant flow data for the program.

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

BEP does not currently track the disability status of applicants and/or selectees. We will continue to work on a plan to successfully capture the applicant flow data of the program.

### C. Awards

1. Using the inclusion rate (IR) 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**  
b. Awards, Bonuses, & Incentives (PWTD) **Yes**

PWD received the following awards at lower rates than People Without Disabilities (PWOD<sup>2</sup>):

Award Type	PWOD Inclusion Rate (%) <sup>3</sup>	PWD Inclusion Rate (%)
Time Off Hours 11-20	4.15	2.37
Cash Awards: 500 and under	28.42	23.66
Cash Awards: 1000- 1999	10.60	8.17
Cash Awards: 3000 - 3999	79.95	54.19

<sup>2</sup> PWOD comprises employees who self-identified as having no disability.

<sup>3</sup> The Inclusion Rate represents the percentage of employees within the specified group who received a particular award; i.e., 23.66 percent of employees with a disability received a cash award of \$500 or less.

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PWTD received the following awards at lower rates than People Without Targeted Disabilities (PWOTD<sup>4</sup>):

Award Type	PWOTD Inclusion rate (%)	PWTD Inclusion Rate (%)
Time Off Hours 11-20	3.73	2.00
Cash Awards: 500 and under	27.20	26.00
Cash Awards: 2000 - 2999	8.50	4.00
Cash Awards: 3000 - 3999	73.62	58.00
Cash Awards: 4000 - 4999	0.76	0.00

2. Using the IR 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)  | <b>No</b>  |
| b. Pay Increases (PWTD) | <b>Yes</b> |

Zero PWTD received QSI, compared to 0.64 percent of PWOTD.

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. **Yes**

The results of the most recent “BEProud Awards” program were reviewed, and it was noted that 1.08 percent of PWD were recognized, compared with 1.77 percent of WOD. PWTD exceeded the benchmark, however, with 6.00 percent of PWTD receiving a BEProud award, compared to 1.51 percent of PWOTD.

The BEProud Awards are held annually to recognize BEP employees for exceptional performance, outstanding customer service, leadership, quality achievements, innovative contributions, exhibition of BEP core values in the workplace and service to the community at large.

<sup>4</sup> PWOTD comprises employees who self-identified as having no disability, plus employees with a disability, less employees with a targeted disability.

## 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. **Yes**

**GS-13:** Selected internal applicants is **22.22** percent which is less than expected when compared to **32.07** percent for qualified internal applicants. This is a trigger.

**GS-14:** Selected internal applicants is **0.00** percent which is less than expected when compared to **37.50** percent for qualified internal applicants. This is a trigger.

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. **Yes**

**GS-13:** Selected internal applicants is **0.00** percent which is less than expected when compared to **15.76** percent for qualified internal applicants. This is a trigger.

**GS-14:** Selected internal applicants is **0.00** percent which is less than expected when compared to **15.00** percent for qualified internal applicants. This is a trigger.

**GS-15:** Selected internal applicants is **0.00** percent which is less than expected when compared to **17.65** percent for qualified internal applicants. This is a trigger.

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. **Yes**

**GS-13:** Selected applicants is **7.69** percent which is less than expected when compared to qualified internal applicants by **8.00** percent. This is a trigger.

**GS-15:** Selected internal applicants is **0.00** percent which is less than expected when compared to **15.13** percent for qualified internal applicants. This is a trigger.

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

**GS-14:** Selected applicants is **0.00** percent which is less than expected when compared to **5.88** percent for qualified internal applicants. This is a trigger.

**GS-15:** Selected internal applicants is **0.00** percent which is less than expected when compared to **6.72** percent for qualified internal applicants. This is a trigger.

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. **Yes**

**Managers:** Selected applicants is **0.00** percent which is less than expected when compared to **32.00** percent for qualified internal applicants. This is a trigger.

**Supervisors:** Selected internal applicants is **0.00** percent which is less than expected when compared to **3.03** percent for qualified internal applicants. This is a trigger.

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. **Yes**

**Executives:** Selected applicants is **0.00** percent which is less than expected when compared to qualified internal applicants by **17.65** percent. This is a trigger.

**Managers:** Selected internal applicants is **0.00** percent which is less than expected when compared to **20.00** percent for qualified internal applicants. This is a trigger.

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. **Yes**

**Executives:** Selected applicants is **0.00** percent which is less than expected when



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compared to qualified internal applicants by **15.13** percent. This is a trigger.

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. Yes

**Executives:** Selected applicants is **0.00** percent which is less than expected when compared to qualified internal applicants by **6.72** percent. This is a trigger.

**Managers:** Selected internal applicants is **0.00** percent which is less than expected when compared to **5.98** percent for qualified internal applicants. This is a trigger.

## 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.

In FY24, BEP had 8 employees that were hired under a Schedule A hiring authority who may have been eligible for conversion during the FY 2024 reporting period. Of those 8 employees, 2 were converted to career-conditional appointments; 4 resigned prior to their two-year trial period being complete; 1 employee transferred to another agency prior to conversion and 1 employee was terminated during their trial period.

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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)   | <b>No</b>  |
| b. Involuntary Separations (PWD) | <b>Yes</b> |

1.04 percent of PWD were involuntarily separated in FY 2024, compared to 0.23 percent of people without disabilities (PWOD).

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

- |                                   |            |
|-----------------------------------|------------|
| a. Voluntary Separations (PWTD)   | <b>Yes</b> |
| b. Involuntary Separations (PWTD) | <b>Yes</b> |

7.69 percent of PWTD separated voluntarily in FY 2024 compared to the 6.26 percent of people without targeted disabilities (PWOTD).

1.92 percent of PWTD were separated involuntarily in FY 2024, while only 0.40 percent of PWOTD were involuntarily separated.

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.

Exit survey data has not yet been reviewed.

## **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.

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External Website: [Accessibility Statement | Engraving & Printing](#)

**How to file a complaint:**

For information about filing a complaint against the BEP under Section 508, contact OEODM at (202) 874-3460 or TTY at (202) 874-4931 or by email at [OEODM@bep.gov](mailto:OEODM@bep.gov).

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.

External Website: [Accessibility Statement | Engraving & Printing \(bep.gov\)](#)

**How to file a complaint:**

For information about filing a complaint against the BEP under the Architectural Barriers Act (ABA), contact the Office of Equal Opportunity and Diversity Management (OEODM) at (202) 874- 3460 or TTY at (202) 874-4931 or by email at [OEODM@bep.gov](mailto:OEODM@bep.gov).

An ABA complaint can be filed online using the online [complaint form](#):

**Alternative ABA Complaint Filing Methods**

1) E-mail to [enforce@access-board.gov](mailto:enforce@access-board.gov);

2) Fax to (202) 272- 0081

3) Mail to:

Compliance and Enforcement

U.S. Access Board

1331 F Street, N.W., Suite 1000

Washington, DC 20004-1111

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.

**Accessibility of Facility**

In FY 2024, the Western Currency Facility (WCF) continued projects to support ABA compliance, such as widening doorways in the facility, and adjusting grab bars and soap dispensers in the bathrooms. At the Washington, DC Facility (DCF), the DC Replacement Facility team consulted with OEODM to help ensure accessibility is integrated into plans for the new facility. Additionally, a project was initiated to deploy a Gravograph machine to support braille signage at the DCF. The project team obtained IT Security approval and installed the required software and began preparations to train the personnel who will operate the machine. Anticipated deployment is early FY 2025.

**Accessibility of Technology**

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BEP awarded a contract for IT consulting services in the last quarter of FY 2023, to evaluate the current IT accessibility policies. In FY 2024, the assessment began with a survey to BEP offices, which enabled OES to identify gaps and recommend solutions to better meet employee accessibility needs.

In addition, BEP's Office of Enterprise Solutions partnered with OEODM and provided just in time training to the BEP workforce during two of OEODM's virtual office hour sessions in the third quarter of FY 2024. OES provided a guest speaker to discuss Sec 508 at the conclusion of a session focused on Reasonable Accommodations, and also for a Sec 508-focused session titled "Creating Accessibility Through 508 Compliance."

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

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

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

Reasonable accommodation cases in FY 2024, were unusually high and complex. OEODM processed 37 individual requests, 8 of which included multiple accommodations requested per case. 32 requests were process within the 20-day goal. Average processing time was 11 days. A Part H is being initiated for FY 2025 to improve processing time.

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

Overall, BEP has an effective Disability Program, supported by various policies, procedures, and practices. Throughout FY 2024, BEP provided reasonable accommodations guidance via training courses, virtual office hours, and postings on its internal and external websites. Employees also were required to attend mandatory reasonable accommodations training in July 2024.

In FY 2024, BEP continued to leverage appropriate stakeholders, to include OHR, the Offices of Chief Counsel and Office of Facilities Support (OFS), BEP Medical Provider Chief Information Officer (CIO) organizations, and other relevant partners to ensure timely and effective processing of RA requests.

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BEP has a dedicated reasonable accommodation budget that was readily and easily accessible, when needed. Other BEP organizations such as CIO, OFS, Office of Security, and requesting employee's organization have also utilized their budget to fund accommodation requests that were specific to their programs. BEP also has multiple sources providing American Sign Language interpreting services. Furthermore, BEP continued to use the RA tracker established by Treasury's OCRE, to track timeliness of processing and types of requests as well as monitor RA data for trends.

## **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.

1. 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.

BEP has an established PAS policy and procedures, and a PAS contract that can be utilized when a PAS request is received. In FY 2024, BEP received no PAS requests.

## **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? **No**
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement? **No**
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. **N/A**

### **B. EEO Complaint Data involving Reasonable Accommodation**

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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? **No**
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? **No**
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. **N/A**

## 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? **No**
2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD? **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.

### Triggers:

<b>Trigger 1: PWD and PWTD received some awards at lower rates than PWOD and PWOTD.</b>
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A review of Table B9-2 shows that PWD and PWTD received some awards at lower rates than PWOD and PWOTD, respectively. Specifically:

- Time Off Hours 11-20: PWD and PWTD both had triggers in this category.
  - 2.37 percent of PWD received this award, compared to 4.15 percent of PWOD
  - 2.00 percent of PWTD received this award, compared to 3.73 percent of PWOTD
- Cash Awards 500 and under: PWD and PWTD both had triggers in this category.
  - 23.66 percent of PWD compared to 28.42 percent of PWOD
  - 26.00 percent of PWTD compared to 27.20 percent of PWOTD
- Cash Awards 1000 – 1999: PWD had a trigger in this category.
  - 8.17 percent of PWD received this award, compared to 10.60 percent of PWOD

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- Cash Awards 2000 – 2999: PWTD had a trigger in this category.
  - 4.00 percent of PWTD received this award, compared to 8.50 percent of PWOTD.
- Cash Awards 3000 – 3999: PWD and PWTD both had triggers in this category.
  - 54.19 percent of PWD received this award, compared to 79.95 percent of PWOD.
  - 58.00 percent of PWTD received this award, compared to 73.62 percent of PWOTD.
- Cash Awards 4000 – 4999: PWTD had a trigger in this category.
  - 0.00 percent of PWTD received this award, compared to 0.76 percent of PWOTD.
- Zero PWTD received QSI, compared to 0.64 percent of PWOTD.
- 1.08 percent of PWD received a BEProud Award (BEP’s internal award program), compared with 1.77 percent of PWOD.

Even though PWD fell below the benchmarks in four out of seven of the time off and cash award categories, it is noted that this group was above the inclusion rate for QSI. 1.08 percent of PWD received QSI in FY 2024 compared to 0.46 percent of PWOD.

<b>Barrier(s)</b>	Ongoing analysis	
<b>Objective(s)</b>	To determine, what if any, barriers preventing PWTD from receiving awards comparable to the applicable benchmarks or inclusion rates.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan?</b>
Judy Caniban, Chief Office of Equal Opportunity and Diversity Management  Karnelis (Kay) Godette, Chief Office of Human Resources (FY 2024)  Edythe Merced Nicholas, Acting Chief Office of Human Resources (FY 2024)  Douglas Schott, Acting Chief Office of Human Resources (FY 2025)		Yes
<b>Barrier Analysis Process Completed? No</b>		<b>Barrier(s) Identified? No</b>
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	

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Complaint Data (Trends)		Yes	FY 2024 EEOC 462 Report and Anti-Harassment Inquiries		
Grievance Data (Trends)		No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)		Yes	FY 2024 EEOC 462 Report and Anti-Harassment Inquiries		
Climate Assessment Survey (e.g., FEVS)		Yes	FY 2024 Treasury Inclusion Survey Results		
Exit Interview Data		No	FY 2024 Exit Survey Results		
Focus Groups		No			
Interviews		No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		Yes	FY 2024 EEOC 462 Report		
Other (Please Describe)		Yes	Internal award program data (BEProud Award recipients)		
Target Date (mm/dd/yyyy)	Planned Activities		Sufficient Staffing & Funding (Yes/No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2023	Review awards policy, practice and/or procedure to determine the potential barriers to PWTD receiving awards comparable to employees without disabilities.		Yes	9/30/2025	

**Trigger 2: PWD and PWTD had lower than expected participation in some mission critical occupations (MCO) and in certain grade levels.**

*PWTD did not meet the Federal goal of 12 percent in two (2) of the six (6) MCOs while PWD did not meet the Federal goal of 2 percent in one (1) MCO:*

A review of BEP's MCOs by disabilities shows PWTDs are below the 2 percent Federal goal in three of the MCOs - 0083 (Police) at 1.05 percent, and 4406 (Letter Press Operator) at 1.32 percent. PWD did not meet the Federal goal of 12 percent in one MCO (4406 at 11.40 percent). It is noted that there has been improvement in MCO participation since FY 2023; last year, PWTD had low or no participation in three MCOs, and PWD's participation in 4406 has improved in FY 2024. Additionally, 45.45 percent and 18.18 percent of new hires in 2606 (Electronic Industrial Controls Mechanic) were PWD and PWTD, respectively.

*PWTD have low participation rates in the GS-1 to GS-10 grade cluster:*

In FY 2024, PWTD comprised 0.94 percent of the GS-1 to GS-10 permanent workforce. Analysis of the B4 tables shows triggers at the following grade levels:



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- GS-7: 1.29 percent were PWTD
- GS-9: 0.00 percent were PWTD

PWTD also had no representation at the GS-5, GS-6, and GS-8 levels; however, these triggers were not statistically significant due to the population sizes of those grade levels (five, six, and two employees, respectively). While PWTD currently have robust participation in the GS-11 to SES cluster, analysis is needed to determine if any barriers are impeding opportunities for PWTD to participate in lower-graded positions.

PWD and PWTD have robust participation in grades GS-13 to GS-15, exceeding the Government-wide goals at those grade levels. However, analysis of the B11 and B15 tables show triggers in internal promotions and new hires:

- GS-13 internal promotions
  - PWD: 32.07 percent of qualified applicants / 22.22 percent of selections
  - PWTD: 15.76 percent of qualified applicants / 0.00 percent of selections
- GS-14 internal promotions
  - PWD: 37.50 percent of qualified applicants / 0.00 percent of selections
  - PWTD: 15.00 percent of qualified applicants / 0.00 percent of selections
- GS-13 new hires
  - PWD: 15.24 percent of qualified applicants / 7.69 percent of selections
- GS-14 new hires
  - PWTD: 5.80 percent of qualified applicants / 0.00 percent of selections
- GS-15 new hires
  - PWD: 15.13 percent of qualified applicants / 0.00 percent of selections
  - PWTD: 6.72 percent of qualified applicants / 0.00 percent of selections

<b>Barrier(s)</b>	Ongoing analysis	
<b>Objective(s)</b>	To determine, what if any, barriers preventing PWD and PWTD from fully participating in the BEP workforce, specifically in the occupations and grade levels listed above.	
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan?</b>	
Judy Caniban, Chief Office of Equal Opportunity and Diversity Management	Yes	
Karnelis (Kay) Godette, Chief Office of Human Resources (FY 2024)		
Edythe Merced Nicholas, Acting Chief Office of Human Resources (FY 2024)		

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Douglas Schott, Acting Chief Office of Human Resources (FY 2025)				
<b>Barrier Analysis Process Completed? No</b>		<b>Barrier(s) Identified? No</b>		
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables	Yes	Additional related triggers identified in Applicant Flow Data.		
Complaint Data (Trends)	Yes	FY 2024 EEOC 462 Report and Anti-Harassment Inquiries		
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	FY 2024 EEOC 462 Report and Anti-Harassment inquiries		
Climate Assessment Survey (e.g., FEVS)	Yes	FY 2024 Treasury Inclusion Survey results		
Exit Interview Data	No	FY 2024 Exit Survey results		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	FY 2024 EEOC 462 Report		
Other (Please Describe)	Yes	Position Descriptions (PDs) were reviewed to identify triggers which may indicate barriers to any EEO groups' participation in MCOs. Many of BEP's senior positions, as well as GS-7 and GS-9 are found in MCOs.		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes/No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2023	Review outreach and recruitment policy, practice and/or procedure specifically in MCOs.	Yes	09/30/2025	
09/30/2023	Review outreach and recruitment policy, practice and/or procedure related to hiring and promotion of PWD and PWTD at the GS-13 through GS-15 grade levels.	Yes	09/30/2025	
09/30/2023	Accelerate strategic consultation and engagement with appropriate	Yes	09/30/2025	

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	hiring managers and provide data on status of BEP and specific directorate information on PWTD hires and workforce composition to ensure information is considered when making outreach and hiring decisions.			
09/30/2023	<p>Establish a PWD and PWTD Hiring and Awareness Campaign that will include:</p> <ul style="list-style-type: none"> <li>• Re-educating managers and supervisors on BEP's responsibility to meet the 2 percent and 12 percent goal of hiring PWTD and PWD, respectively.</li> <li>• Provide appropriate managers and supervisors with quarterly status of PWD and PWTD hires, participation for awareness and inclusion in outreach and recruitment decisions</li> </ul>	Yes	09/30/2025	
09/30/2025	Review positions and corresponding position description to determine availability of opportunities to hire PWTD at GS-1 through GS-10 grade levels.	Yes	09/30/2025	

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<b>Trigger 3: PWD and PWTD had higher separation rates than PWOD and PWOTD.</b>		
<p>Review of Table B1 showed triggers in the PWOD and PWTD separation rates:</p> <ul style="list-style-type: none"> <li>• In FY 2024, BEP had 119 voluntary separations, which includes the Resignation, and Retirement categories: <ul style="list-style-type: none"> <li>○ 7.69 percent of PWTD separated voluntarily in FY 2024, compared to 6.26 percent of PWOTD.</li> </ul> </li> <li>• BEP had nine involuntary separations during the reporting period, which includes the Removal and Reduction in Force categories: <ul style="list-style-type: none"> <li>○ 1.04 percent of PWD separated involuntarily in FY 2024, compared to 0.23 percent of PWOD.</li> <li>○ 1.92 percent of PWTD separated involuntarily in FY 2024, compared to 0.40 percent of PWOTD.</li> </ul> </li> </ul> <p>Note that the “Other Separations” category was excluded from the “voluntary” and “involuntary” tabulations, as it includes some separation types (such as death of an employee) which do not reflect a voluntary action on the part of the employee, or an adverse action on the part of the agency.</p>		
<b>Barrier(s)</b>	Barrier analysis not yet initiated.	
<b>Objective(s)</b>	To determine, what if any, barriers cause PWD and PWTD to separate from BEP at higher rates than employees without disabilities.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>
Judy Caniban, Chief Office of Equal Opportunity and Diversity Management  Douglas Schott, Acting Chief Office of Human Resources (FY 2025)		Yes
<b>Barrier Analysis Process Completed? No</b>		<b>Barrier(s) Identified? No</b>
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	
Complaint Data (Trends)	Yes	FY 2024 EEOC 462 Report and Anti-Harassment Inquiries
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	FY 2024 EEOC 462 Report and Anti-Harassment inquiries
Climate Assessment Survey (e.g., FEVS)	Yes	FY 2024 Treasury Inclusion Survey results. Noted that PWD

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		rated all workplace characteristics lower than employees without disabilities.		
Exit Interview Data	No	FY 2024 Exit survey results		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	FY 2024 EEOC 462 Report		
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes/No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2025	Review applicable policies, practices, procedures and exit surveys to investigate why PWDs and PWTDS were separating at higher rates compared to those without disabilities.	Yes		

### **Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
FY 2024	<p><b>Outreach and Recruitment Efforts:</b></p> <ul style="list-style-type: none"> <li>• Established and maintained partnerships with minority, women, and other associations, to include organizations focusing on PWDs, to help develop and maintain a pipeline of qualified candidates from all segments of society, for employment in BEP's mission-critical positions. List of partnerships below: <ul style="list-style-type: none"> <li>○ Association of Latino Professionals for America (ALPFA)</li> <li>○ Association of People Supporting Employment First (APSE)</li> <li>○ Hispanic/Latino Professionals Association (HLPA)</li> <li>○ Mid-Atlantic Association of Women in Law Enforcement (MAAWLE)</li> <li>○ National Society of Black Engineers (NSBE)</li> <li>○ Out to Innovate</li> <li>○ Printing and Graphics Association Mid Atlantic (PGAMA)</li> <li>○ Printing United Alliance</li> <li>○ Society of Women Engineers (SWE)</li> <li>○ The Association for Severely Handicapped (TASH)</li> <li>○ Women in Print</li> <li>○ Women in Manufacturing (WiM)</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>• Partnered with vocational and trade schools to highlight the modern, cutting-edge technologies, strong culture at BEP, pride in what is being produced, and supporting BEP’s mission. <ul style="list-style-type: none"> <li>○ National Tech to Gov Virtual Event (Virtual)</li> <li>○ Law Enforcement Recruitment Opportunities – Military (separation) (DC)</li> <li>○ Fort Worth Law Enforcement Hiring Expo (TX)</li> <li>○ North Texas Job Fair (TX)</li> <li>○ Diversity &amp; Inclusion Career Fair (Virtual)</li> <li>○ WIFLE Foundation Inc Recruitment/Career Day (FL)</li> <li>○ 13th Annual Southern MD Hiring Event (MD)</li> <li>○ Dallas Veterans Job Fair (TX)</li> <li>○ BEP Job Fair (TX)</li> <li>○ Dallas Diversity Group (TX)</li> <li>○ FAPAC Virtual and In-person Student Career Fair (MD)</li> <li>○ Fort Worth Law Enforcement Hiring Expo (TX)</li> <li>○ Reliant Solutions Law Enforcement Hiring Expo (VA) and MD-Baltimore Law Enforcement Hiring Expo (MD)</li> <li>○ Elevate Career Fair (VA)</li> <li>○ WiM Winter Virtual Career Fair and WiMEF Virtual Career Fair (Virtual)</li> <li>○ BEP Summer Break 2024 Craft Demo</li> <li>○ Level Up to Public Service Career Fair at HBCU (Delaware)</li> <li>○ OHR began working on plans to establish partnerships with vocational schools in the DC/Maryland and Dallas/Ft. Worth areas in the next fiscal year.</li> <li>○ OHR worked with representatives from BEP’s Manufacturing community to plan and conduct outreach to highlight the need for vocational education and applicants.</li> </ul> </li> <li>• OHR deployed a survey for candidates at outreach events to gather demographic data; 22 responses were collected in FY 2024. Of the responses collected, approximately 40% of respondents were female and/or minority. Within the minority responses, approximately 23% identified as African American, 9% identified as Hispanic, 9% identified as Asian / Pacific Islander, and the remaining 5% of minority respondents identified as American Indian or Alaskan Native. When asked what attracted attendees to BEP employment, salary and incentives and unique mission and work duties ranked among the top attractions, each ranking at approximately 23%. Approximately 45% of respondents were not previously aware of BEP or the type of positions offered.</li> </ul>
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	<ul style="list-style-type: none"><li>• Explored and exploited appropriate social media platform as a source to recruit prospective candidates and another way to promote the Bureau; OHR collaborated with the Office of External Relations on using social media to gain a presence and to more effectively brand BEP. Currently BEP has a presence on Facebook, Twitter, Instagram, YouTube, and LinkedIn. OHR also collaborated with the Office of Personnel Management and USA Staffing to build a BEP branding page on USA Jobs, taking applicants directly to all of BEP posted opportunities.</li><li>• BEP purchased 13 professional memberships in FY 2024 to assist in focusing recruitment and outreach to People With Disabilities, as well as Women in Law Enforcement; Lesbian, Gay, Bisexual, Transgender, Queer, Plus (LGBTQ+) Professionals; Hispanic/Latino Professionals; and Women in STEM. OHR utilized feedback and data from the barrier analysis team in identifying professional memberships to obtain.</li><li>• BEP required managers and supervisors to complete training on the Veterans Recruitment Act (VRA), which can be an avenue to onboard Veterans with disabilities, as well as the Veterans Employment Opportunity Act (VEOA).</li><li>• In FY 2024, BEP held its second Career Fair since before COVID. It was successful in highlighting current job openings and inviting both BEP employees and non-BEP employees to explore career options at the WCF in Texas. OEODM had a table and shared information on the demographics of the workforce.</li><li>• BEP OHR established an FY 2022-2024 Outreach and Recruitment plan. Actions for the plan that were designated for FY 2024 were completed to respond to ongoing recruitment and retention efforts in Mission/Major Occupations and areas of low participation. The FY 2025-2027 Outreach and Recruitment Plan is currently under review.</li><li>• BEP participated in 31 recruitment and outreach events in FY 2024, which were selected to enhance recruitment and also showcase BEP's career opportunities to high school students from all segments of society. A sampling of the events include outreach to Veterans, People with Disabilities, Historically Black Colleges and Universities, Women in Law Enforcement, 4-H, and Federal Asian Pacific American Council (FAPAC) events. BEP in-person participants included managers and supervisors in addition to OHR and OEODM.</li><li>• In FY 2024, BEP held its second Career Fair since before COVID. It</li></ul>
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	<p>was successful in highlighting current job openings and inviting both BEP employees and non-BEP employees to explore career options at the WCF in Texas. OEODM had a table and shared information on the demographics of the workforce.</p> <ul style="list-style-type: none"> <li>• OHR hosted Monthly Human Resources Update Meetings to provide supervisors and managers ongoing education and updates on recruitment-related topics such as Schedule A, Pathways programs, and Prohibited Personnel Practices.</li> </ul>
FY 2024	<p><b>Retention Strategies:</b></p> <ul style="list-style-type: none"> <li>• BEP continued to deliver mandatory EEO related training for supervisors and non-supervisory employees. Both supervisors and non-supervisors were required to complete one hour of live training with five topics: EEO complaints, anti-harassment, accommodations for disabilities and religious practices, alternative dispute resolution, and information about respectful communication. The training included a case study related to RA.</li> <li>• OEODM continued to deploy virtual office hour sessions to enhance engagement, and potentially retention, by educating the workforce on topics specific to EEO. Sessions were offered to all shifts, to ensure as many employees as possible had an opportunity to attend. Fifteen different topics were presented in FY 2024, several of which were specific to the Disability Program.</li> <li>• BEP re-deployed Civil Treatment training sessions in FY 2024. Building upon the content presented in mandatory EEO training, Civil Treatment provides employees and supervisors practical guidance on appropriate workplace behavior, and identifying and correcting issues before they rise to the level of harassment or discrimination. All BEP offices will receive this training. In FY 2024, OEODM delivered eight Civil Treatment for Employees sessions, engaging 139 employees; and five Civil Treatment for Leaders sessions, engaging 28 supervisors.</li> <li>• To proactively accommodate employees who are deaf or hard of hearing (as well as members of the public), BEP initiated a project to procure additional video phones to be deployed in conference rooms and at entrances to BEP facilities.</li> <li>• OHR hosted Monthly Human Resources Update Meetings to provide supervisors and managers ongoing education and updates on topics such as Prohibited Personnel Practices, career development, EEO-</li> </ul>



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	related training opportunities, and retention.
FY 2024	<p><b>Barrier Analysis Efforts</b></p> <ul style="list-style-type: none"> <li>• BEP continued to support the Barrier Analysis Team (BAT). In FY 2024, a member of the SET served as the ES for the BAT.</li> <li>• BEP's BAT, which was established in FY 2023, continued to meet bi-weekly in FY 2024. The team, which includes hiring managers from across BEP, along with advisors from OEODM and OHR, focused this year's analysis on identifying potential barriers to participation in BEP's MCOs. The BAT developed a new process and Barrier Analysis tool to review Position Descriptions (PD), comparing them to OPM Qualification standards to determine if the PDs contained requirements which might limit equal opportunity. Leveraging this process, the team identified and prioritized several triggers for further analysis.</li> <li>• In addition to BAT meetings, OHR and OEODM held bi-weekly partnership meetings, which included reviewing personnel policies, practices, and procedures to determine if there are barriers to equal opportunity for certain groups.</li> <li>• In February of 2024, the BAT briefed BEP's senior executives on its work using EEOC's root cause analysis tool and the common triggers for MCOs which included recruitment plans, marketing BEP and review of qualifications and position descriptions. BEP's SET supported the continued work of the BAT.</li> <li>• OEODM conducted regular review of BEP's workforce demographics and participation of PWD and PWTD to determine triggers and address accordingly with appropriate partners, to include OHR and managers and supervisors.</li> <li>• To identify potential barriers in acquisition and procurement, OES reviewed BEP's acquisition policies, and began the development of a playbook and updated written policies to integrate accessibility requirements into the procurement process.</li> <li>• To assist the SET and supervisors with understanding workforce demographics, BEP developed a Workforce Demographics dashboard in FY 2023 as a timely resource for providing a snapshot of the workforce. In FY 2024, OEODM and CIO continued to collaboratively refine the dashboard, so SET members will have insight into Directorate-level data visualizations.</li> </ul>

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FY 2024	<p><b>508 Compliance Requirements</b></p> <ul style="list-style-type: none"> <li>• Collaboration Site: BEP continued to maintain an internal collaboration site on its Intranet to provide BEP employees and contractors a single location to obtain information on 508 compliance requirements. The site covers general information, services that are provided and resources for more information.</li> <li>• In FY 2023, the Office of Enterprise Solutions (OES), which includes BEP's Section 508 Team, set up a contract for a Section 508 organizational review; in FY 2024, the assessment began with deploying a survey to BEP offices to establish a baseline. The assessment survey received a 79 percent response rate and enabled OES to identify gaps and recommend solutions. The Manager of OES' Enterprise Strategic Planning and Management Division briefed BEP's Office Chiefs on the results of the assessment and plans to continue addressing the identified gaps.</li> <li>• OES developed a metrics dashboard to track the five core areas of Section 508 compliance; this dashboard is intended to provide clear and actionable insights for continuous improvement.</li> <li>• OES implemented enhanced technology lifecycle processes to ensure accessibility compliance considerations are included from development to deployment and total lifecycle maintenance.</li> <li>• OES implemented and enhanced their Sec 508 testing techniques, validation scope, tracking procedures, and accessibility standards.</li> <li>• OES conducted rigorous evaluation of digital content and technologies for compliance with Section 508 requirements; over 20 applications were tested in FY 2024.</li> <li>• OES developed and implemented a complaint management system to efficiently address and resolve accessibility compliance issues reported by users. This included mounting a fillable form on the BEP intranet for users to report issues, complaints, and questions.</li> <li>• OES began deploying customized, planned training efforts to educate staff on Section 508 requirements and best practices. Additionally, OES partnered with OEODM to deliver two Virtual Office Hour presentations (six sessions) related to 508 topics.</li> </ul>

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FY2024	<p><b>Physical Access Enhancement</b></p> <ul style="list-style-type: none"> <li>• WCF continued projects to support ABA compliance, such as widening doorways in the facility, and adjusting grab bars and soap dispensers in the bathrooms, along with ensuring all bathrooms have braille signage.</li> <li>• DCF <ul style="list-style-type: none"> <li>○ The DC Replacement Facility team consulted with OEODM to help ensure accessibility compliance is integrated into plans for the new facility.</li> <li>○ Leaders from BEP's Office of Facilities Support (OFS), OES, and OEODM collaborated to ensure continuation of efforts in response to the Department of the Treasury, Office of Civil Rights and Equal Employment Opportunity (OCRE) audit on the effectiveness and efficiency of BEP's Title VII and Rehabilitation and other EEO-related programs, including Accessibility reviews on the facilities at both BEP locations. In FY24, a project was initiated to deploy a Gravograph machine to support braille signage at the Washington, DC facility. The project team obtained IT Security approval and installed the required software, and began preparations to train the personnel who will operate the machine. Anticipated deployment is early FY 2025.</li> <li>○ OFS began installing touchless door openers in bathrooms in the DCF Annex building.</li> </ul> </li> </ul>
FY 2024	<p><b>Reasonable Accommodation</b></p> <ul style="list-style-type: none"> <li>• A dedicated parking area was identified for BEP's DCF fleet of scooters, which were procured for reasonable accommodation (RA) purposes.</li> <li>• To proactively accommodate employees who are deaf or hard of hearing (as well as members of the public), BEP initiated a project to procure additional video phones to be deployed in conference rooms and at entrances to BEP facilities.</li> <li>• The RA circular was updated and submitted for approval; it will be released in FY 2025.</li> <li>• Training and education <ul style="list-style-type: none"> <li>○ New Employee Orientation: BEP conducted bi-weekly new employee orientations for each location (Washington, DC and Forth Worth, TX facilities) in FY</li> </ul> </li> </ul>

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	<p>2024, delivering EEO information and RA request procedures to a total of 221 new hires.</p> <ul style="list-style-type: none"><li>○ BEP's annual mandatory EEO training included information about accommodations for disabilities and religious practices, and a case study related to RA.</li><li>○ Building upon the information presented in mandatory training, OEODM delivered a Virtual Office Hour presentation focused on Reasonable Accommodations, and another on Religious Accommodations. Each presentation was offered to the workforce three times, so employees from all shifts would have an opportunity to participate.</li><li>○ OEODM Chief presented information about the RA process in the Third Quarter Director's Town Hall.</li></ul>
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