Affirmative Action Plan
for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

Section I: Efforts to Reach Regulatory Goals

*EEC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with 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)  
      Answer: No
   
   b. Cluster GS-11 to SES (PWD)  
      Answer: Yes

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

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.
   
   a. Cluster GS-1 to GS-10 (PWTD)  
      Answer: No
   
   b. Cluster GS-11 to SES (PWTD)  
      Answer: No

<table>
<thead>
<tr>
<th>Grade Level Cluster(GS or Alternate Pay Planb)</th>
<th>Total</th>
<th>Reportable Disability</th>
<th>Targeted Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>#</td>
<td>#</td>
</tr>
<tr>
<td>Numeral Goal</td>
<td>--</td>
<td>12%</td>
<td>2%</td>
</tr>
<tr>
<td>Grades GS-1 to GS-10</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grades GS-11 to SES</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

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.

   Answer  Yes

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

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff By Employment Status</th>
<th>Responsible Official (Name, Title, Office Email)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Full Time</td>
<td>Part Time</td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td>49</td>
<td>3</td>
</tr>
<tr>
<td>Processing applications from PWD and PWTD</td>
<td>77</td>
<td>3</td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>145</td>
<td>1</td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>59</td>
<td>3</td>
</tr>
<tr>
<td>Special Emphasis Program for PWD and PWTD</td>
<td>14</td>
<td>1</td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
<td>20</td>
<td>2</td>
</tr>
</tbody>
</table>

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.

   Answer  Yes

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

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.
Section III: Program Deficiencies In The Disability Program

<table>
<thead>
<tr>
<th>Brief Description of Program Deficiency</th>
<th>C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective</td>
<td>Ensure Treasury and its bureaus RA policies and procedures are in compliance with EEOC requirements and submitted to EEOC for final approval.</td>
</tr>
<tr>
<td>Target Date</td>
<td>Sep 30, 2019</td>
</tr>
<tr>
<td>Completion Date</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Planned Activities</th>
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</thead>
<tbody>
<tr>
<td><strong>Target Date</strong></td>
<td><strong>Completion Date</strong></td>
</tr>
<tr>
<td>Jan 30, 2018</td>
<td>January 30, 2018</td>
</tr>
<tr>
<td>Mar 30, 2018</td>
<td></td>
</tr>
<tr>
<td>Aug 30, 2018</td>
<td>August 24, 2018</td>
</tr>
<tr>
<td>Sep 7, 2018</td>
<td>September 7, 2018</td>
</tr>
<tr>
<td>Mar 30, 2019</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>Accomplishment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>To date, OCRD has submitted the revised bureau RA policies and procedures to EEOC for BEP, FS, DO, IRS, Mint, OCC and TIGTA. Of those submitted to EEOC, EEOC has approved OCC’s RA policies and procedures. OCRD is currently working with FinCEN, IRS-CC, OIG, SIGT, and TTB to finalize their revisions to their RA Policies and procedures. OCRD has submitted all bureau RA policies and procedures to EEOC with the exception of IRS. EEOC has approved OCC RA policy and procedures. OCRD is currently working with IRS to finalize their revisions and the RA policy and procedures. Once finalized OCRD will submit to EEOC for final review and approval. OCRD is currently waiting for EEOC’s approval of our remaining bureaus.</td>
</tr>
<tr>
<td>2019</td>
<td></td>
</tr>
</tbody>
</table>
Section IV: 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 APPLICATIONS WITH DISABILITIES

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

- The Workforce Recruitment Program (WRP) is continually promoted as a source for recruiting students and graduating seniors with disabilities, including disabled veterans.
- The Pathways Intern Program is maximized to hire interns with targeted disabilities.
- Outreach efforts with Disability and Military Student offices are routinely conducted to promote internship opportunities.
- Recruitment events, fairs, and conferences are mapped for annual participation, i.e., Hiring Heroes, Federal Disability Workforce Consortium, the Department of Labor’s WRP Training, and the Treasury Department’s Veteran Employment Summit at the Treasury Executive Institute to market Treasury and its job opportunities.
- As a part of Treasury’s “Be A Champion” initiative, the Department’s Disability and Veteran’s Program Managers work closely with hiring managers to identify qualified PWD and PWTD, to include disabled veterans, to non-competitively hire using Schedule A Hiring Authority.
2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

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

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

When individuals utilize the Schedule A Hiring Authority, the process for eligibility and hire encompass: 1) Application qualification review process – conducted by the servicing HR Specialist who confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability; 2) Applicant referral - individuals deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures, including the application of veterans’ preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, Veterans’ Recruitment Appointment (VRA), etc.). Alternatively, when individuals submit their resumes directly to the Special Placement Program Coordinator (SPPC) for vacant positions, the SPPC refers the resumes to the hiring official for review and consideration. The hiring official forwards the selected resumes to the HR Specialist to determine qualifications. If qualifications and Schedule A eligibility are met, the resumes are then returned to the hiring manager with guidance on selection procedures, including the application of veterans’ preference, when applicable.

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

Answer  Yes

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

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

The Department engages with varied organizations such as Department of Vocational Rehabilitation Centers, Veterans Administration (VA) and Department of Labor Employment Service by partnering, providing lectures, and attending on-site presentations and classroom visits to develop stronger relationships with college students and professors, and with college campus clubs and groups that maintain focus on students with disabilities. Meetings with various organizations that support disability employment, such as Wounded Warriors and Department of Vocational Rehabilitation Centers are held periodically to share Treasury’s process for providing vacancy announcements, and share information about opportunities, including career development tracks. Through a Memorandum of Understanding, Treasury maintains a working relationship with the Computer/Electronic Accommodation Program (CAP) to secure devices frequently used by PWD and PWTD. The existing sign language interpreter contract ends in FY 19, therefore the Department is exploring a new sign language interpreter contract to provide an effective and
efficient procedure for providing sign language interpreters beginning FY 20.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.
   a. New Hires for Permanent Workforce (PWD)  Answer  No
   b. New Hires for Permanent Workforce (PWTD)  Answer  No

<table>
<thead>
<tr>
<th>New Hires</th>
<th>Total</th>
<th>Reportable Disability</th>
<th>Targeted Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(#)</td>
<td>Permanent Workforce (%)</td>
<td>Temporary Workforce (%)</td>
</tr>
<tr>
<td>% of Total Applicants</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of Qualified Applicants</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of New Hires</td>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   a. New Hires for MCO (PWD)  Answer  Yes
   b. New Hires for MCO (PWTD)  Answer  Yes

FY 2019 New Hires Qualified vs. New Hires
0110 (44) PWD: 5.48% - 2.27*** PWTD: 3.39% - 0.00***
0340 (13) PWD: 4.02% - 7.69 PWTD: 0.54% - 7.69%
0343 (76) PWD: 7.56% - 28.95 PWTD: 3.42% - 1.32%
0501 (29) PWD: 5.68% - 13.79 PWTD: 2.36% - 3.45%
0511 (22) PWD: 8.12% - 0.00*** PWTD: 3.50% - 0.00***
0570 (66) PWD: 4.90% - 4.55** PWTD: 1.29% - 1.52%
0905 (102) PWD: 5.91% - 2.94** PWTD: 2.36% - 0.00**
1169 (269) PWD: 6.33% - 20.07% PWTD: 3.29% - 4.09%
1811 (99) PWD: 2.55% - 3.03% PWTD: 1.31% - 0.97%
2210 (755) PWD: 7.80% - 18.81% PWTD: 4.03% - 2.78**

The above triggers were identified as a result of analyzing the above data for new hires by occupational series and permanent mission-critical occupations: *The 1811, Criminal Investigators occupational series, limits the employment opportunities available for PWTD based on OPM’s established medical requirements for the position. Therefore, we would expect the hiring of PWD and PWTD to be limited in this series and do not consider the lack of participation to be a trigger.
**Other triggers were noted in the 0343, 0570, 0905, and 2210 occupational series when comparing the qualified applicant flow data with the new hires for PWD and PWTD. There was an overall increase in the number of 0343 new hires in the last year; and although there was a trigger for PWTD, there was a higher rate of actual selections than the prior year. A slight difference of 0.34% was noted for 0570 occupational series, however, that difference is not significant enough to be considered a critical trigger at this time. The triggers noted in the 0905 occupational series were consistent to the prior year for both PWD and PWTD. A new trigger was noted for the 2210 occupational series for PWTD. For the Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART J’s. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau PART J’s. Treasury will monitor all bureaus’ PART J’s to ensure appropriate plans are developed to eliminate any identified barrier(s). ***When there is limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury established a threshold of 50 new hires. Any hire rate less than 50 will not support a statistically significant outcome. Occupations with limited hiring such as the 0511 did not have enough hires to determine if there is an actual trigger. (*1811 is an exception as stated above). However those differences are less than 1% and not considered triggers at this time.
3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Qualified Applicants for MCO (PWD)

Answer Yes

b. Qualified Applicants for MCO (PWTD)

Answer Yes

Relevant Applicant Pool Relevant Applicants Pool MCO vs. Qualified Internal Applicants Pool vs. Qualified Internal Applicants

<table>
<thead>
<tr>
<th>New Hires to Mission-Critical Occupations</th>
<th>Total</th>
<th>Reportable Disability</th>
<th>Targetable Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qualified Applicants (#)</td>
<td>(%)</td>
<td>New Hires (%)</td>
<td>Qualified Applicants (%)</td>
</tr>
<tr>
<td>Numerical Goal</td>
<td>--</td>
<td>12%</td>
<td>2%</td>
</tr>
</tbody>
</table>

| Relevant Applicant Pool Relevant Applicants Pool MCO vs. Qualified Internal Applicants Pool vs. Qualified Internal Applicants |
|------------------------------------------|-------|-----------------------|-----------------------|
| 0110 (23) PWD: 8.33% - 0.00% PWTD: 0.00% - 0.00% 0340 (303) PWD: 3.96% - 3.45%** PWTD: 0.57% - 0.37%** 0343 (76) PWD: 5.93% - 5.94% PWTD: 2.74% - 2.73%** 0501 (715) PWD: 5.90% - 5.92% PWTD: 2.72% - 2.72% 0511 (29) PWD: 4.00% - 4.17% PWTD: 0.00% - 0.00% 0570 (1) PWD: 3.48% - 3.42%** PWTD: 0.99% - 0.92%** 0905 (4) PWD: 0.00% - 0.00% PWTD: 0.00% - 0.00% 1169 (343) PWD: 5.45% - 5.41% PWTD: 2.57% - 2.58%** 1811 (890 PWD: 0.51% - 0.00% PWTD: 0.51% - 0.00% 2210 (70) PWD: 10.43% - 9.69% PWTD: 4.33% - 4.52%** The below triggers were identified when analyzing the above data for permanent mission-critical occupations among qualified internal applicants: *The 1811, Criminal Investigators occupational series, limits the employment opportunities available for PWD and PWTD based on OPM’s established medical requirements for the position. Therefore, we would expect the hiring of PWD and PWTD to be limited. **We noted differences when comparing the applicant flow data with the qualified applicants for PWD and PWTD in the 0340, 0343, 0570, 1169, and 2210 occupational series. However, those differences are less than 1% and not considered triggers at this time. For Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART J’s. Plans to improve hiring for PWD within the major occupations listed are detailed in the specific bureau PART J’s. Treasury will monitor and provide feedback for all bureaus’ PART J’s to ensure appropriate plans are developed to eliminate any identified barriers.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Promotions for MCO (PWD)

Answer Yes

b. Promotions for MCO (PWTD)

Answer Yes

FY 2019 Promotions Qualified Internal Applicants MCOs vs. Internal Promotions vs. Internal Promotions 0110 (23) PWD: 0.00% - 13.04%*** PWTD: 0.00% - 4.35%*** 0340 (303) PWD: 3.45% - 10.56% PWTD: 0.37% - 1.98% 0343 (76) PWD: 5.94% - 8.94% PWTD: 2.73% - 2.10%** 0501 (715) PWD: 5.92% - 9.65% PWTD: 2.72% - 3.36% 0511 (29) PWD: 4.17% - 3.45%*** PWTD: 0.00% - 0.00% 0570 (1) PWD: 3.42% - 0.00%*** PWTD: 0.99% - 0.00%*** 0905 (4) PWD: 0.00% - 0.00% PWTD: 0.00% - 0.00% 1169 (343) PWD: 5.41% - 8.16% PWTD: 2.57% - 0.87%*** 1811 (89) PWD: 0.00% - 1.12% PWTD: 0.51% - 0.00%* 2210 (379) PWD: 9.69% - 18.73% PWTD: 4.33% - 5.01% The below triggers were identified when analyzing the above data for qualified internal applicants among employees promoted to a mission-critical occupation: *The 1811, Criminal Investigators occupational series, limits the employment opportunities available for PWD and PWTD based on OPM’s established medical requirements for the position. Therefore, we would expect the hiring of PWD and PWTD to be limited. **Other triggers were noted in the 0343, 0511, 0570, and 1169 occupational series above when comparing the qualified applicant flow data with the new hires for PWD and/or PWTD. There was a significant decrease in the number of 0343 new hires compared to last year; and although there is a trigger for PWTD, the difference is less than 1% and not considered a trigger. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau PART J’s. Treasury will monitor all bureaus’ PART J’s to ensure appropriate plans are developed to eliminate any identified barriers. ***When there is limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury established a threshold of 50 new hires. Any hire rate less than 50 will not support a statistically significant outcome. Occupations with limited hiring such as the 0110, 0511, 0570, and 0905 series did not have enough hires to determine if there is an actual trigger. *1811 occupational series is an exception as stated above. However those differences are less than 1% and not considered triggers at this time. While there were internal vacancy announcements that reflect the applicant
flow data, the significant difference in the percentage of the Qualified Internal Applicant Pool and the Internal Promotions are the result of existing employees who applied to not only internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2019. This will also result in differences between internal/external selections and promotions rates.

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

A. ADVANCEMENT PROGRAM PLAN

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

Treasury’s opportunities for advancement are accessible and open to all employees, including employees with disabilities. Treasury offers non-competitive opportunities to streamline the hiring process to fill critical and non-critical positions quickly (e.g., details, including positions that can lead to promotion). Leadership development opportunities exist for all qualified employees through such programs as Leadership Succession Review (LSR) for GS-12 to SES employees, Executive Readiness (XR), and Candidate Development Programs (CDP), which can potentially lead to the SES. Treasury encourages diverse employee (including PWD/PWTD) participation in management, leadership and career development programs through the use of employee network groups (ENGs), such as the Adelante and the Veterans Employee Resource Group (VERG), and a variety of other communication venues throughout the agency. Developmental opportunities are broadly communicated to all employees through internal weekly and monthly newsletters, intranet website postings, and shared by ENGs. Treasury encourages individual development plans for all employees. Managers are reminded to consider permanently assigned PWD/PWTD for development opportunities as part of their Individual Development Planning process. In conjunction with available training, Treasury will explore, for FY 2020, the development of a committee composed of bureau representatives to explore additional opportunities (e.g., mentoring) to the disabled community.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The Department of Treasury does not have a formal Career Development Program. However, Treasury bureaus have established varied opportunities to further develop the careers of employees, including PWD and PWTD. The below highlights some programs offered. To view the exhaustive list, please see bureau specific reports. Bureau of Engraving and Printing (BEP) offers a series of programs for GS 7-15. Programs include: • New Leaders Program (NLP) – Targets GS 7-11 employees (or equivalent) and focuses on developing future public service leaders and includes leadership self-assessments, experiential learning, and individual development opportunities integrated into a competency-based learning approach. • Executive Leadership Program (ELP) – Targets GS 12-13 employees (or equivalent), who are seeking to support their organization in meeting its mission and goals, by focusing specifically on the competency of “leading people” through developmental activities and experiences. • Executive Potential Program (EPP) – A competency-based leadership program that prepares high-potential GS 14-15 employees (or equivalent) to lead effectively at the senior level. The curriculum is focused on “leading change” and transforming senior managers into change leaders. • Career Development (CADE) Program – The CADE Program provides upward mobility via defined career training and opportunities that allow the selection and training of disabled veterans (and other employees) GS-11 (or equivalent) and below, whose positions offer limited promotion potential, for placement into positions in other occupational series for which they would not otherwise be qualified. • Electro-Machinist & Mechanical-Machinist Trainee Program - This program is advertised as a four-year trainee program to journeyman Electro-Machinist. This position is located in the Electro-Machine Shop, Office of Security Printing. The incumbent participates in a four year training program with the Bureau of Engraving and Printing including formal, laboratory, and "on-the-job" training. The incumbent is normally assigned to maintain/support all currency printing/processing equipment, including temporary and permanent modifications and installations required to maintain production goals. The incumbent works with journeymen and other peers, while participating in "on-the-job" training. Departmental Offices (DO) partners with the Treasury Executive Institute (TEI) to offer employees individual coaching services for a six-month period. TEI’s coaching
services assist DO employees with achieving professional goals, solve individual leadership challenges, and develop leadership attributes. Fiscal Service (FS) offers developmental programs for employees to take classes to make them eligible for promotion to higher grades in their career ladder. Fiscal Service also offers career development classes in person and online that enable employees to develop skills to help them advance and qualify for other positions in Fiscal Service. Internal Revenue Service (IRS) offers career development opportunities service-wide to all employees for non-competitive details/promotions and internal merit promotions. In addition, leadership development opportunities are available for all employees to consider. IRS Chief Counsel offers training and development opportunities for attorneys Counsel-wide. Reasonable accommodations are made for all training. U.S. Mint offers Manufacturer Certification and Apprenticeship Program and Operator Certification and Apprenticeship programs which are available to PWD and PWTD. Office of the Comptroller of the Currency (OCC) offers professional development programs for its bank examiners and cross-training and developmental assignments to equip attorneys with legal skills and experiences across multiple legal practices areas through the Honors Attorney Program. Overall, training and development courses are available to all employees, in the classroom, online, virtual, and self-study. Temporary details and short-term work assignments are advertised on the agency’s Opportunities Board to all employees, such as: • The EXCEL I Program, sponsored by the Large Bank Supervision (LBS) department, provides bank examiners in pay band NB-V the opportunity to develop expertise in one of eight specialty areas. • The EXCEL II Program expanded professional development opportunities for bank examiners in pay band NB-IV in the eight specialty areas of the EXCEL I Program. • Midsize and Community Bank Supervision (MCBS) Pre-commission Bank Examiners Career Forums provide information about bank examiner career opportunities and explain the Uniform Commission Examination (UCE) preparatory process. • The Honors Attorney Program is designed to provide cross-training and developmental assignments to equip attorneys with legal skills and experiences across multiple legal practices areas. • The Leadership Exploration and Development (LEAD) Program is an enterprise-wide leadership development program targeted to employees at the NB-V to NB-VI, 2 levels, to help develop specific competencies aligned to skills and abilities needed at the team leader and/or manager level. • The MCBS NB-V Career Forum for Bank Examiners provides bank examiners exposure to the career options available in the various bank supervision lines of business, and resources and factors to consider when making career decisions. It also provides opportunities to network with senior leaders throughout the agency. • Non-examiner Career Forums provide non-examiners exposure to the variety of career options in the non-examiner lines of business. • Agency training and development courses are available to all employees via the classroom, online, virtual, and self-study. Treasury Inspector General for Tax and Alcohol (TIGTA) programs include: • The Office of Audit’s Leadership Development Program for Auditors at the GS-13, GS-14, and GS-15 levels allows qualified diverse employees to participate in career development training, and opportunities that will prepare them for Audit management vacancies. • The Office of Investigations provides diverse employees an opportunity to participate in their Equity, Diversity, and Inclusion Program, which offers career development opportunities for all employees. • Career developmental opportunities using rotational assignments and business unit details are also encouraged for all TIGTA employees. TIGTA communicates vacancy announcements and detail opportunities to all employees, including PWD/PWTD, through email, intranet, and internet. Alcohol and Tobacco, Tax and Trade Bureau (TTB) primary career development program (CDP) is the Emerging Leaders Program (ELP) – a three year centralized training program that is competitive with selections made at the Assistant Administrator level. During the 4th quarter of each fiscal year, TTB broadcasts an ELP annual opportunity announcement to request applicants for the Program. The announcement provides general information about the ELP and its three programs, identifies the three-year curriculum for each program, and explains how employees may apply. The TTB ELP framework consists of three separate and distinct programs: – Program for non-supervisory employees; – Program for 1st level supervisors; and – Program for 2nd level supervisors and senior leaders. Further: • All TTB employees, including disabled veterans, are eligible for consideration for the ELP and may apply during the annual announcement period. Selections are made through a competitive process. TTB’s Training and Professional Development Division chairs a meeting with senior leaders and provides its recommendations for selection. Senior leaders make the final selections. In FY 2019, TTB had 9 graduates from its ELP, with 16% of those being veterans. • The ELP is TTB’s primary leadership CDP. However, it is not considered a formal CDP in accordance with Treasury’s definition, given that it does not meet the following criteria: – Must be announced via USAJOBS; – Announcement must include a statement indicating this is a CDP; – Program must be competitive and individuals must apply; and – Upon completion of the Program, the employee would be considered qualified for a promotion to the next higher grade.

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

<table>
<thead>
<tr>
<th>Career Development Opportunities</th>
<th>Total Participants</th>
<th>PWD</th>
<th>PWTD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicants (#)</td>
<td>Selectees (#)</td>
<td>Applicants (%)</td>
</tr>
<tr>
<td>Fellowship Programs</td>
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<td></td>
<td></td>
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<tr>
<td>Training Programs</td>
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<tr>
<td>Detail Programs</td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>
### Career Development Opportunities

<table>
<thead>
<tr>
<th></th>
<th>Total Participants</th>
<th>PWD</th>
<th>PWTD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicants (＃)</td>
<td>Selectees (＃)</td>
<td>Applicants (%)</td>
</tr>
<tr>
<td>Coaching Programs</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Other Career Development Programs</td>
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<td></td>
<td></td>
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<tr>
<td>Mentoring Programs</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Internship Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

   a. Applicants (PWD) Answer No
   b. Selections (PWD) Answer No

4. Do triggers exist for PWTD 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

   a. Applicants (PWTD) Answer No
   b. Selections (PWTD) Answer No

### C. AWARDS

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

   a. Awards, Bonuses, & Incentives (PWD) Answer Yes
   b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

The inclusion rate for PWD (19.25%) and PWTD (19.19%) in cash awards $1,000 - $1,999, was below the inclusion rate for employees with no disability (27.42%). The inclusion rate for PWD (2.19%) and PWTD (1.56%) in cash awards $2,000 - $2,999, was below the inclusion rate for employees with no disability (3.51%).

### C. AWARDS

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

   a. Pay Increases (PWD) Answer No
   b. Pay Increases (PWTD) Answer No

<table>
<thead>
<tr>
<th>Time-Off Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Awards</td>
<td>Total (#)</td>
<td>Reportable Disability %</td>
<td>Without Reportable Disability %</td>
<td>Targeted Disability %</td>
<td>Without Targeted Disability %</td>
</tr>
</tbody>
</table>
### Other Awards

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<th>Other Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Performance Based Pay Increase</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
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</table>

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

   a. Other Types of Recognition (PWD)  
   Answer  N/A

   b. Other Types of Recognition (PWTD)  
   Answer  N/A

### 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

   a. SES  
   i. Qualified Internal Applicants (PWD)  
   Answer  No
   ii. Internal Selections (PWD)  
   Answer  No

   b. Grade GS-15  
   i. Qualified Internal Applicants (PWD)  
   Answer  No
   ii. Internal Selections (PWD)  
   Answer  No

   c. Grade GS-14  
   i. Qualified Internal Applicants (PWD)  
   Answer  No
   ii. Internal Selections (PWD)  
   Answer  No

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

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

   a. SES  
   i. Qualified Internal Applicants (PWTD)  
   Answer  No
   ii. Internal Selections (PWTD)  
   Answer  Yes
b. Grade GS-15
   i. Qualified Internal Applicants (PWTD) Answer No
   ii. Internal Selections (PWTD) Answer Yes

c. Grade GS-14
   i. Qualified Internal Applicants (PWTD) Answer No
   ii. Internal Selections (PWTD) Answer No

d. Grade GS-13
   i. Qualified Internal Applicants (PWTD) Answer No
   ii. Internal Selections (PWTD) Answer No

Qualified Internal Applicant Internal Promotions GS-15 PWTD: 3.19%  1.16%* SES PWTD: 0.51%  0.00%* Triggers were identified for PWTD when analyzing Qualified Internal Applicants and Selectees for Promotion to senior grade levels, indicating the following results: *A trigger was identified for PWTD who were promoted to the SES and GS-15. The trigger was noted between the rate at which applicants were qualified and their rate of selection. For Treasury bureaus that noted triggers in their workforce, evaluations are noted in their PART J’s. Plans to improve hiring for PWTD within the grade groupings are detailed in the specific bureau PART J’s. Treasury will monitor all bureaus’ PART J’s to ensure appropriate plans are developed to eliminate any identified barriers. While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentage of the Qualified Internal Applicant Pool and the Internal Promotions are the result of existing employees who applied to not only internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2019. This will also result in differences between internal/external selections and promotions rates.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   a. New Hires to SES (PWD) Answer Yes
   b. New Hires to GS-15 (PWD) Answer No
   c. New Hires to GS-14 (PWD) Answer No
   d. New Hires to GS-13 (PWD) Answer No

Qualified External Applicants External Hires GS-13 PWD: 7.11%  16.89% GS-14 PWD: 6.44%  15.59% GS-15 PWD: 6.98%  11.49% SES PWD: 7.48%  6.98%* A trigger was identified for PWD when analyzing Qualified Internal Applicants and Selectees for Promotion to senior grade levels, indicating the following results: *We noted differences when comparing the qualified external applicants with the external hires for PWD in the SES. However the difference is less than 1% and not considered a trigger at this time. For Treasury bureaus that noted triggers in their workforce, evaluations are noted in their PART J’s. Plans to improve hiring for PWD within the grade groupings are detailed in the specific bureau PART J’s. Treasury will monitor all bureaus’ PART J’s to ensure appropriate plans are developed to eliminate any identified barriers.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   a. New Hires to SES (PWTD) Answer No
   b. New Hires to GS-15 (PWTD) Answer No
c. New Hires to GS-14 (PWTD)  
Answer Yes

d. New Hires to GS-13 (PWTD)  
Answer Yes

Qualified External Hires External Applicants GS-13 PWTD: 3.26% 2.14%** GS-14 PWTD: 2.87% 2.63%* GS-15 PWTD: 3.45% 3.45% SES PWTD: 2.85% 6.98%  
Triggers were identified for PWTD when analyzing Qualified External Applicants and Selectees for External Hires to senior grade levels, indicating the following results: *We noted differences when comparing the qualified external applicants with the external hires for PWTD in the GS-14 grade levels. However, the difference is less than 1% and not considered a trigger at this time. **Treasury noted a trigger between the qualified external applicants and the actual hires in the GS-13 grade level. For Treasury bureaus that noted triggers in their workforce, evaluations are noted in their PART J’s. Plans to improve hiring for PWTD within the grade groupings are detailed in the specific bureau PART J’s. Treasury will monitor all bureaus’ PART J’s to ensure appropriate plans are developed to eliminate any identified barriers.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives
i. Qualified Internal Applicants (PWD)  
Answer No
ii. Internal Selections (PWD)  
Answer No

b. Managers
i. Qualified Internal Applicants (PWD)  
Answer No
ii. Internal Selections (PWD)  
Answer No

c. Supervisors
i. Qualified Internal Applicants (PWD)  
Answer No
ii. Internal Selections (PWD)  
Answer No

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives
i. Qualified Internal Applicants (PWTD)  
Answer No
ii. Internal Selections (PWTD)  
Answer No

b. Managers
i. Qualified Internal Applicants (PWTD)  
Answer No
ii. Internal Selections (PWTD)  
Answer No

c. Supervisors
i. Qualified Internal Applicants (PWTD)  
Answer No
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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

<table>
<thead>
<tr>
<th>Type</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. New Hires for Executives (PWD)</td>
<td>Yes</td>
</tr>
<tr>
<td>b. New Hires for Managers (PWD)</td>
<td>Yes</td>
</tr>
<tr>
<td>c. New Hires for Supervisors (PWD)</td>
<td>No</td>
</tr>
</tbody>
</table>

Supervisory Positions Qualified External New Hires Applicants Executives PWD: 6.99% 2.45%* Managers PWD: 8.98% 7.45%* Supervisors PWD: 5.00% 0.00%** Triggers were identified for PWD when analyzing Qualified External Applicants and New Hires to supervisory positions, indicating the following results: * We noted differences when comparing the qualified external applicants with the new hires for PWD at the Executives and Managers level. ** Treasury noted a trigger between the Qualified External Applicants and New Hires to the Supervisors level, however, the non-selection of 1 qualified Supervisory external applicant at 5% would not warrant further analysis at this time. For Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART J’s. Plans to improve hiring for PWD within are detailed in the specific bureau PART J’s. Treasury will monitor all the bureaus’ PART J’s to ensure appropriate plans are developed to eliminate any identified barriers.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

<table>
<thead>
<tr>
<th>Type</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. New Hires for Executives (PWTD)</td>
<td>Yes</td>
</tr>
<tr>
<td>b. New Hires for Managers (PWTD)</td>
<td>Yes</td>
</tr>
<tr>
<td>c. New Hires for Supervisors (PWTD)</td>
<td>No</td>
</tr>
</tbody>
</table>

Supervisory Positions Qualified External New Hires Applicants Executives PWTD: 2.69% 1.96%* Managers PWTD: 4.10% 3.19%* Supervisors PWTD: 0.00% 0.00%** Triggers were identified for PWTD when analyzing Qualified External Applicants and New Hires to supervisory positions, indicating the following results: * We noted differences when comparing the qualified external applicants with the new hires for PWTD at the Executives and Managers level. However, for each, the difference is less than 1% and not considered a trigger at this time. For Treasury bureaus that noted triggers in their workforce evaluations, these triggers are noted in their PART J’s. Plans to improve hiring for PWTD within are detailed in the specific bureau PART J’s. Treasury will monitor all the bureaus’ PART J’s to ensure appropriate plans are developed to eliminate any identified barriers.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be 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 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.

| Answer | No |

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In FY 2019, Treasury had 34 Schedule A employees with a disability who were eligible to convert into the competitive service after two years of satisfactory service. Of the 34 eligible Schedule A employees, 17 were not converted timely. This is a 29% increase in untimely conversions compared to 5 eligible employees not converted timely in FY18. Treasury bureaus indicated the following status for the 17 eligible Schedule A employees, who were not converted timely: • One (1) employee was not converted because the employee misunderstood the conversion and declined. However, after sharing information regarding Schedule A conversion, the conversion is now pending in HR; • Ten (10) employees’ conversions were submitted and processed late; • One (1) employee was not converted because the employee declined; however, after sharing information regarding Schedule A conversion, the conversion is now pending in HR; • One (1) employee’s conversion was still pending at the time of this report since eligibility was at the end of this FY; • One (1) employee is pending performance improvement; • Three (3) were based on unsatisfactory performance; and • One (1) employee was terminated for unsatisfactory performance. Note: The above consolidated view of data may mask the potential barrier(s) in the processes within the independent bureaus. Therefore, bureaus are required to analyze their data for trigger(s) that lead to a potential barrier and develop a separate plan(s) to address the notable deficiencies, such as bureau level conversions. The Department monitors each bureau’s progress and provides guidance (quarterly/annually) that will assure a clear path for timely conversions of all eligible Schedule A candidates with a disability into the competitive service, after two years.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.
   a. Voluntary Separations (PWD)  Answer Yes
   b. Involuntary Separations (PWD)  Answer Yes

The inclusion rate for PWD (10.39%) exceeded the inclusion rate of persons without disability (8.74%) for voluntary separations. The inclusion rate for PWD (0.96%) exceeded the inclusion rate of persons without disability (0.76%) for involuntary separations. When evaluating the types of voluntary separations, we noted that 53% were due to retirement, 8% were transfers, and 37% were resignations. The remaining 2% were due to deaths. Based on comments in the FY 19 Treasury Employee Exit Survey and the explanation cited below in question #4, Treasury does not consider the separations “due to retirement” a trigger. However, each bureau where a trigger has been identified will be asked to evaluate those voluntary separations due to retirements, transfers and resignations, along with information gleaned from their exit survey, to determine if these triggers are potential barriers.

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Reportable Disabilities %</th>
<th>Without Reportable Disabilities %</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

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)  Answer Yes
   b. Involuntary Separations (PWTD)  Answer Yes

The (inclusion rate) for PWTD (10.99%) exceeded the rate of persons without targeted disability (8.74%) for voluntary separations. The (inclusion rate) for PWTD (1.16%) exceeded the rate of persons with without targeted disability (0.76%) for involuntary separations. When evaluating the types of voluntary separations, we noted that 53% were due to retirement, 8% were transfers, and 37% were resignations. The remaining 2% were due to deaths. Based on comments in the FY 19 Treasury Employee Exit Survey and the explanation cited below in question #4, Treasury does not consider the separations “due to retirement” a trigger. However, each bureau where a trigger has been identified will be asked to evaluate those voluntary separations due to retirements, transfers and resignations, along with information gleaned from their exit survey, to determine if these triggers are potential barriers.

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Targeted Disabilities %</th>
<th>Without Targeted Disabilities %</th>
</tr>
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<td></td>
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</table>

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

When evaluating total voluntary separations of PWD and PWTD, we noted that 53% were due to retirement, 8% were transfers, and 37% were resignations. When evaluating the total involuntary separations, we noted that 4% were due to end of appointment.
Treasury does not consider the separations due to retirement a trigger. However, bureaus will be asked to evaluate those voluntary and involuntary separations due to transfers and resignations, along with the information gleaned from the exit survey, to determine if these triggers are potential barriers. During the period of October 1, 2018 through September 30, 2019, 195 permanent (85%), seasonal (10%) and temporary (5%) PWD responded to the Department’s Exit Survey. The overall responses from PWD were similar to the overall permanent/seasonal employee responses, in that 33% (64) had more than 25 years of service and 46% (90) were age 60 or older. Of the respondents with disabilities, 33% (65) were disabled veterans. The most frequently cited reason for separation of PWD was retirement (110 or 56%). The factor most frequently cited as impacting a PWD’s decision to leave was job stress 49% (97) and office morale 33% (66). Additional responses specified that 70% (136) of the respondents indicated their work experience was generally positive; 56% (109) stated nothing could have been done to prevent them from leaving; 63% (123) stated they would be interested in returning to work for Treasury; and 70% (137) stated they would recommend Treasury as a good place to work.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §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.

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.

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

In FY 2019, OCRD conducted five accessibility reviews: two at the U.S. Mint, at Headquarters in Washington, D.C. and Fort Knox, NY facility and three at IRS Taxpayer Assistance Centers (TAC), in Washington, D.C., Austin and San Antonio, TX. Each location has taken actions to ensure compliance with Sections 501 and 504 of the Rehabilitation Act of 1973 (29 C.F.R. 1614 and 31 C.F.R Part 17) to provide access to persons with disabilities, but minor improvements should be made to fully comply with the accessibility requirements. Such as: In the U.S. Mint headquarters building, the entrance and exit doors push assist buttons were not working, no van accessible parking spaces, the height of the water fountains do not meet the height standard, some grab bars did not have the required clearance space between the wall and the bar, and some bathrooms had exposed sink pipes. In Fort Knox, there was no accessible route from the provided parking lot to the facility and main building, no accessible exit from the security post into the facility, ramp located at the entrance of the facility was not fully compliant, and water fountains clearance and spout heights do not meet the accessibility requirements. In the IRS TAC – Landover, MD the entrance to the building, entrance door exceeds the allowed force and does not have a push assist button; access aisles assigned to van accessible parking spaces did not meet the required width; a few of the bathroom grab bars exceeded the maximum height; and some grab bars did not have the required...
clearance space between the wall and the bar. In Austin, the signs marking the accessible parking spaces did not meet the required height, interior spaces lack directional signs and signs did not have Braille characters, dispensers in the bathrooms were positioned at a height that exceeded the standards, and some grab bars did not have the required clearance space between the wall and the bar. In San Antonio, the van accessible parking spaces were not wide enough to meet the standard, the dispensers in the bathrooms were positioned at a height that exceeded the standards, some grab bars did not have the required clearance space between the wall and the bar, the turn-around clearance space in the men’s bathroom did not meet the standard and in the women’s bathroom, the changing table was obstructing the clearance space. In FY 2020, OCRD was scheduled to conduct an accessibility review of office spaces at BEP and DO. However, due to COVID-19, OCRD re-adjusted its plan and rescheduled the BEP and DO accessibility reviews for FY 2021.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

Each bureau is responsible for independently processing their requests for reasonable accommodations. The average time frame (number of days) for processing within the bureaus for FY 2019 are: BEP 09 DO 20 FinCEN 14 FS 04 Mint 08 IRS 76 IRS CC 20 OCC 07 TIGTA 20 TTB 13 The overall average time for processing the Departments’ initial requests for reasonable accommodations is 19 days. The Department recognizes the high average for IRS which is currently reviewing its methodology for calculating “average days for providing reasonable accommodations.” Treasury has acquired a Treasury-wide reasonable accommodation tracking system that will eliminate the need to manually calculate processing timeframes and increase the efficiency of processing requests.

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

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

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

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

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

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

Section VII: 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 governmentwide average?

Answer 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?

Answer Yes

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

The percentage of Treasury’s formal complaints filed by PWDs alleging harassment was 10.94% which is significantly low when compared to the government-wide average of 19.69%. Note: EEOC’s Government-wide averages on processing initial requests are available for formal complaints only. In FY 2019, Treasury did not have any findings of discrimination involving harassment based on disability status; however, there was one complaint involving harassment based on disability status that ended in a settlement.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer 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?

Answer Yes

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

The percentage of Treasury’s formal complaints filed by PWDs alleging failure to accommodate was 8.54% which is low when compared to the government-wide average of 13.53%. Note: EEOC’s Government-wide averages on processing initial requests are available for formal complaints only. Treasury did not have any findings of discrimination involving failure to provide a RA; however, Treasury had two complaints involving failure to provide RA that resulted in settlements.

Section VIII: 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?

Answer No

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

Answer 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

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

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

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