



BUREAU OF ENGRAVING AND PRINTING

Fiscal Year 2020 Annual EEO Program Status Report (MD 715)

"The Bureau of Engraving and Printing (BEP) derives strength from a workforce indicative of the Nation's diverse population. Workforce diversity is integral to the success of BEP. The overall goal is to make sure we take full advantage of the differing viewpoints, ideas, and backgrounds that each of us brings to the table. It is the widest diversity of viewpoints and backgrounds that serve to maximize our effectiveness." Len Olijar, BEP Director, October 1, 2020

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PARTS A THROUGH E

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 th & C Streets, SW	Washington	DC	20228	TRAI	11001

PART B – TOTAL EMPLOYMENT

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	1762	24	1786

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

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

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

EEO Program Staff	Name	Title	Occupational Series	Pay Plan and Grade	Phone Number	Email Address
Principal EEO Director/Official	Judith Diaz Myers	Acting Chief	0301	SES	202-874-2007	Judith.DiazMyers@bep.gov
Affirmative Employment Program Manager	Meltina Bynum	EEO Specialist	0260	GS-13	202-874-3640	Meltina.Bynum@bep.gov
Complaints and Compliance Program Manager	Willie Tucker	EEO Specialist	0260	GS-13	202-874-0099	Willie.Tucker@bep.gov
Diversity & Inclusion Program Manager	Meltina Bynum	EEO Specialist	0260	GS-13	202-874-3640	Meltina.Bynum@bep.gov

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Special Emphasis Program Manager	Meltina Bynum Paula Rathers	EEO Specialist	0260	GS-13 GS-12	202-874-3640 817-847-3950	Meltina.Bynum@bep.gov Paula.Rathers@bep.gov
Reasonable Accommodation Program Manager	Rushelle Wilson Paula Rathers	EEO Specialist	0260	GS-12	202-874-2437 817-847-3950	Rushelle.Wilson@bep.gov Paula.Rathers@bep.gov
Alternative Dispute Resolution Program Manager	Willie Tucker	EEO Specialist	0260	GS-13	202-874-0099	Willie.Tucker@bep.gov
Anti-Harassment Program	Willie Tucker	EEO Specialist	0260	GS-13	202-874-0099	Willie.Tucker@bep.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Willie Tucker	EEO Specialist	0260	GS-13	202-874-0099	Willie.Tucker@bep.gov
Principal MD-715 Preparer	Rushelle Wilson	EEO Specialist	0260	GS-12	202-874-2437	Rushelle.Wilson@bep.gov Judy.Caniban@bep.gov
	Judy Caniban	Chief		GS-15		
Other EEO Staff	Lynette Taylor	EEO Specialist	0260	GS-11	202-874-4571	Lynette.Taylor@bep.gov

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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	
Diversity and Inclusion Plan Under Executive Order 135	Yes	
Diversity Policy Statement	Yes	
Human Capital Strategic Plan	Yes	
EEO Strategic Plan	No	
Results From Most Recent Federal Viewpoint Survey or Annual Employee Survey	Yes	

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PART E. EXECUTIVE SUMMARY

Mission

The Bureau of Engraving and Printing's (BEP) 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's efforts to accomplish its mission are guided by the following goals:

- ❖ Execution: To safely and timely deliver quality products to our stakeholders in a 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 not only the driving force towards accomplishing its mission, but strengthen BEP's commitment to ensuring that BEP remains a place of employment that adheres to the principles and practices of Equal Employment Opportunities (EEO) for all employees and applicants seeking employment at BEP. At BEP, EEO is an organizational imperative and employees at all levels are all held accountable for maintaining a workforce that is representative of the civilian labor force, fostering a positive environment that is free of discrimination and work culture that attracts, develops, and retains highly qualified individuals who are able to realize their fullest potential.

Introduction

This report covers the period from October 1, 2019 through September 30, 2020, and outlines BEP's EEO program activities for fiscal year (FY) 2020. The report highlights BEP's accomplishments during FY 2020 and details FY 2021, planned activities and strategies to ensure BEP maintains a Model EEO Program.

Fiscal year 2020, was exceptionally challenging for the entire Federal government, including BEP. The second quarter, started with a global health crisis (COVID 19) that nearly paralyzed some Federal agencies' operations and required a significant alteration to the normal way of conducting business.

The pandemic limited BEP's outreach, recruitment, training, EEO and Diversity and Inclusion (D&I) initiatives. All in-person EEO and D&I related events were cancelled and Human Resources (HR) training, outreach and recruitment efforts were put on hold. Furthermore, BEP had to shift its primary focus towards ensuring the health and safety of its employees while preparing to operate under an unprecedented work environment that would allow BEP to continue to produce the nation's currency and provide a vital global service that touches the lives of people and businesses around the world.

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BEP remained committed to a Model EEO Program as required under Section 717 of the Title VII (Part A) and Section 501 of the Rehabilitation Act (Part B). This commitment was evident at all levels of the organization as documented in this FY 2020 EEO Program Status Report (MD 715).

EEO Program Overview and FY 2020 Accomplishments

Essential Element A – Demonstrated Commitment from Agency Leadership

BEP Director's commitment to early conflict resolution, equal opportunity, a working environment free from discrimination, harassment and retaliation was evident through the timely issuance of critical policies emphasizing that Alternative Dispute Resolution (ADR), EEO and D&I are organizational imperatives and holding leaders, managers and supervisors accountable for keeping the workplace free of discrimination and retaliation. On the very first day of each fiscal year, specifically FY 2020, the Director reiterates his commitment to EEO and a diverse and inclusive workplace where employees are treated with dignity, respect, and fairness, by ensuring employees understand the federal laws, regulations, and executive orders that prohibit discrimination in the workplace; providing employees with information on multiple avenues of redress; and maintaining fair and impartial complaints and conflict resolution processes, through the following policies:

- ❖ Alternative Dispute Resolution Policy Statement
- ❖ Anti-Harassment Policy Statement
- ❖ Diversity Policy
- ❖ Equal Employment Opportunity Complaint Policy Statement
- ❖ Equal Employment Opportunity Policy Statement
- ❖ Personal Assistant Services Policy Statement
- ❖ Reasonable Accommodations Policy Statement
- ❖ Responsibility for Timely Cooperation in the Equal Employment Opportunity Process
- ❖ Sexual Harassment Policy Statement
- ❖ Sexually Offensive-Unauthorized Material on BEP Property Policy

All the policy statements were made available during New Employee Orientation and on BEP's intranet and Department of the Treasury's (Treasury) public internet site located at: <http://www.moneyfactory.gov/eoadrpolicystatements.html>.

BEP's demonstrated commitment to equal opportunity principles is reflected in BEP's current Strategic Objective VII, "Build a Workforce of Today and Tomorrow" by creating and sustaining a high performing, results-driven workforce that consistently demonstrates high levels of teamwork, collaboration, job satisfaction and pride in organizational, team, and individual work accomplishments. BEP developed and implemented a five-year Human Capital Plan with goals to:

- ❖ Conduct proactive workforce planning
- ❖ Implement hiring improvements and sustain a qualified talent pool
- ❖ Improve existing employee skills, including leadership and management capabilities

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- ❖ Sustain a high-performing, motivated, and accountable workforce
- ❖ Build new capabilities in the Office of Human Resources

and established an Engagement Strategy focusing on Five Key Pillars:

- ❖ Meaning: Work that is valued and significant
- ❖ Appreciation: A culture that encourages authentic and consistent recognition
- ❖ Growth: Active creation of opportunities for both development and advancement
- ❖ Innovation: Commitment to finding new or improved ways to exceeding customer needs
- ❖ Collaboration: Practices that encourage a broad knowledge of, and partnership within the organization.

Despite the pandemic, BEP continued to execute its strategic Human Capital goals through creative and outside-the-box methods to ensure a Model EEO Program for BEP's Workforce of Today and Tomorrow. Throughout FY 2020, the BEP Director remained present and "in touch" with all employees, as evidenced by his 22 personal messages to the BEP workforce, by celebrating BEP's accomplishments and milestones and recognizing the workforce's resilience and commitment to BEP's important mission.

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

In FY 2020, BEP initiated and completed the recruitment process for a permanent Chief of the Office of Equal Opportunity and Diversity Management (OEODM). Pending onboarding of the new Chief, BEP put in place as the Acting Chief for OEODM, a Senior Executive Service (SES) member who reported directly to the BEP Director. During this reporting period, the BEP Director delegated authority over EEO matters to the Deputy Director (Chief Administrative Officer) (CAO). The Acting Chief of OEODM provided day-to-day management of the EEO and D&I programs at BEP and had direct access to the BEP's Director and Deputy Director (CAO). The Acting Chief maintained control of the operation of the budget and funds provided at the beginning of each fiscal year for program development and execution, manpower, materials, and other requirements. The Acting Chief was consulted on human resources issues and attended regular leadership meetings. OEODM had sufficient manpower and fiscal resources to execute BEP's EEO Program requirements, including funding dedicated to reasonable accommodation (RA) and personal assistance services (PAS).

The Acting Chief provided the Director, Deputy Director, (CAO), and the Deputy Director (Chief Operating Officer) (COO), with quarterly EEO updates and progression on areas of concerns as it related to the EEO Program. The Acting Chief also advised and provided appropriate assistance to managers and supervisors regarding the status of EEO programs within a manager's or supervisor's area of responsibility. The Acting Chief conducted the required State of the Agency briefing on February 20, 2020.

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OEODM staff and Office of Human Resources (OHR) specialists collaborated and worked together to review and assess personnel programs, policies, and procedures to ensure management/personnel actions conformed to instructions contained in the Equal Employment Opportunity Commission (EEOC) Management Directive (MD) 715 and engaged other strategic partners such as Office of Chief Counsel (OCC), Office of Security and relevant managers and supervisors in the implementation of BEP's FY 2020, EEO Program planned activities.

OEODM established an internal website for all employees to obtain ADR, EEO and D&I related information as well as contact information for OEODM staff. All of this information is also available on BEP's intranet.

Essential Element C – Management and Program Accountability

BEP further demonstrated its commitment to EEO by emphasizing that employees, managers and supervisors alike have a shared responsibility to proactively support a work environment that values diversity, inclusion and equality of opportunity. Managers and supervisors as well as employees were evaluated on their commitment to BEP's EEO policies and principles. All BEP employees had a mandatory core performance standard, which required individuals to "foster an inclusive workplace where individual differences are valued and leveraged to achieve the vision and mission of the organization through both personal leadership and appropriate behavior." Performance was measured based on ability to accomplish work assignments in a nondiscriminatory manner that demonstrates behaviors that conform civil rights and EEO laws, regulations, and policies, including fairness, cooperation, and respect toward employees and customers.

In FY 2020, BEP created awareness and facilitated learning by providing individualized workforce demographic briefings to SES and their management teams to highlight their successes and target future recruitment activities within each directorate. In addition to providing on-line training, BEP conducted in-person diversity training for production employees and supervisors across all three shifts at both manufacturing locations.

BEP established the BEP Diversity and Inclusion Council (BDIC) comprised of 30 members (25 employees and five senior leaders). Participation was open to employees from all levels, across diverse demographics, including individuals with disabilities (IWD) and Lesbian, Gay, Bisexual, Transgendered and Queer (LGBTQ) group, at both BEP facilities (in Washington, DC and Fort Worth, Texas). In FY 2019, the BDIC executed several initiatives – deployed a voice-of-the-employee survey across BEP to identify the top D&I educational and awareness needs for BEP employees; designed a three to five year D&I educational strategy; created a BDIC website where D&I materials were published; and conducted panels, workshops, and training courses on Unconscious Bias in Hiring Practices, Diversity of Thought, LGBTQ, First Generational Professionals, and Understanding and Communicating with a Multigenerational Workforce. In FY 2020, due to COVID-19, the BDIC was able to conduct one training session on Understanding Autism.

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Essential Element D – Proactive Prevention of Unlawful Discrimination

BEP leverages Treasury's data collection and tracking systems to generate workforce demographics, status of complaints and processing, and applicant flow data and advance BEP's barrier analysis efforts. Through enhanced collaboration between OEODM and OHR, BEP was able to initiate a review of outreach and recruitment efforts to determine what, if any, are the barriers preventing certain groups from fully participating in BEP's workforce.

Joint efforts between OEODM and OHR included participation in job fairs and outreach to Minority Servicing Institutions (MSI) as well as expanding internships through the use of the Pathways Program. In FY 2020, BEP instituted a contract with INROADS. INROADS is a multi-national, nonprofit 501©3 organization with over 50 years of experience and operational competencies in career, professional, and workforce development and diversity through outreach, recruitment, and an integrated training curriculum. INROADS Inc. provides a portfolio of seven highly effective programs and services that focus on the recruitment of students for internships and cooperative programs. These programs focus on the career development and placement of talented collegiate youth from underserved and underrepresented communities into career pathways that prepare them to be leaders in the arenas of corporate, government, industrial, and community focused jobs. Due to the COVID-19 pandemic, the contract was put on hold. This activity will resume when BEP returns to a normal operating status. This is being done so that the intern experience will be maximized to the greatest extent possible.

As an additional metric, OHR added a question to the application questionnaire for applicants to indicate where they found out about the BEP announcement. Having this information will allow BEP to conduct additional analysis on areas to intensify outreach efforts, where it is found to show a more diverse applicant pool. BEP participated in eight career or recruitment fairs to market available positions at BEP and expand the applicant pool and available talent for BEP. Due to COVID-19, at least five of these events were conducted virtually. Some of the events attended were: the Greater Washington, DC Veteran's Job Fair; Dallas Veterans Job Fair; American Chemical Society (ACS) Career Day; Philadelphia Virtual Veterans Job Fair; Dallas Area Virtual Career Fair for Veterans; Maryland Statewide Career and Resource Fair; Treasury's Office of Civil Rights and Diversity; Federal Asian Pacific American Council; and the Virtual Fair at Montgomery College. ACS is one of the largest professional societies and thousands of chemists in United States participate in its activities including national conferences, publications and local chapters. One of BEP's occupations is in the chemistry series (1320), making outreach through ACS relevant and timely. Participation in Veteran's job fairs was another way to ensure BEP continues to attract not only candidates from a diverse background but people with disabilities. BEP also advertised opportunities on Handshakes, which is an online network that partners with more than 1000 colleges and universities to help students find great jobs.

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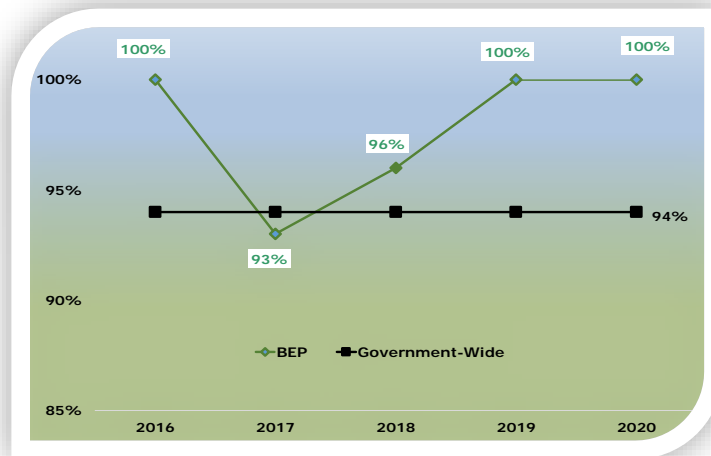
Essential Element E – Efficiency

Counseling

Title 29 Code of the Federal Regulations Part (C.F.R.) 1614.105 requires agencies to complete counseling and issue the aggrieved 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 pre-complaint process.

In FY 2020, all counselings were processed timely. Except for FY 2017, BEP's processing time has been consistently better than the Government-wide rate¹, with the last and current reporting periods at 100% of complaints counseled in accordance with 29 C.F.R. § 1614.105.

Chart 1: Percent of Timely Counseling



Alternative Dispute Resolution

EEOC regulations at 29 C.F.R. § 1614.102 (b) (2) require federal agencies to establish and make available an EEO ADR Program throughout the pre-complaint and formal complaint processes.

Data below shows that BEP offered ADR to **all** individuals who entered the informal complaints process, which was significantly higher when compared to the Government-wide rate of 87%. BEP has been consistently above the Government-wide rate since FY 2016. On average, participation rates at BEP have been above the Government-wide average participation rates. In addition to offering ADR to all individuals who enter the EEO process, BEP also has a policy that requires appropriate BEP officials to participate when the aggrieved or complainant accepted the ADR offer.

¹ All Government-wide rate referenced in this report based on EEOC's Annual Statistical Report of Discrimination Complaints (Form 462)

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Chart 2: ADR Offer Rate

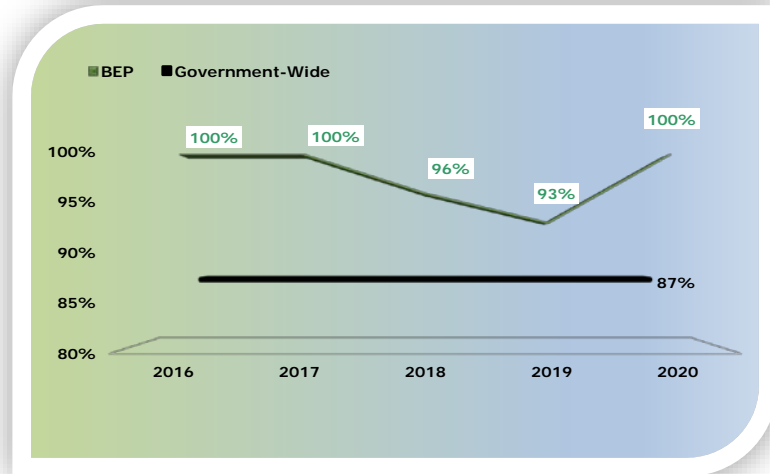
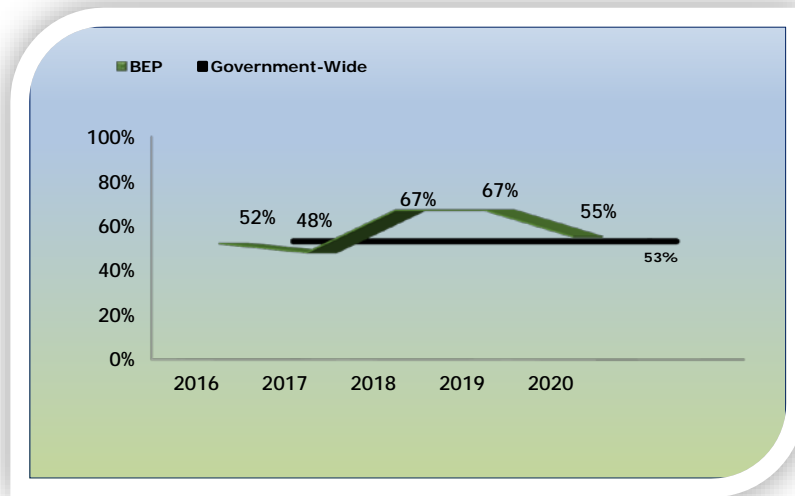


Chart 3: ADR Participation Rate



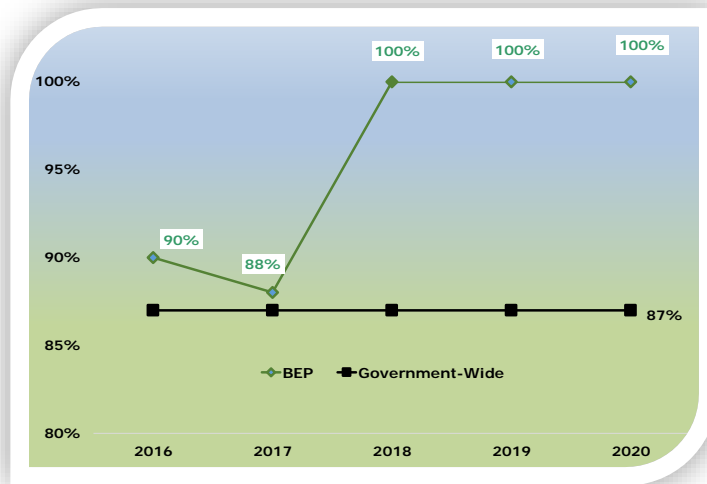
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Investigation

29 C.F.R. § 1614.108 requires agencies to complete investigations from the formal file date within 180, 270 days if extended, or 360 days, if amended.

The chart below shows that all investigations in FY 2020, were completed timely. Furthermore, BEP has been consistently in compliance with the regulatory requirements for the last three reporting periods.

Chart 4: Percent of Timely Investigation



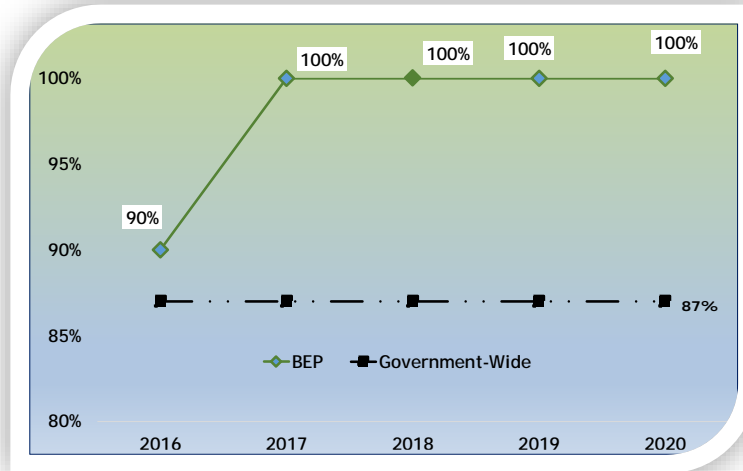
Final Agency Decision

29 C.F.R. § 1614.110 requires agencies to issue a final agency decision (FAD) within 60 days from the Complainant's request for FAD or after 30 days of issuance of Complainant's right to make an election for a FAD or hearing and Complaint fails to make an election.

Data show BEP has consistently been over the Government-wide rate of 87% timely FAD for the last four fiscal years.

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Chart 5: Percent Timely FAD



Reasonable Accommodations

In FY 2020, BEP received and processed 35 reasonable accommodation requests. The average processing time was seven days. Internal BEP procedures require that all accommodation requests are completed within 20 days. Of the 35 requests, 27 requests were processed within 10 days.

Essential Element F – Responsive and Compliance

In FY 2020, BEP submitted the FY 2019, MD 715 and Annual Statistical Report of Discrimination Complaints (Form 462). BEP posted the quarterly No FEAR Act data as required. BEP updated the BEP Reasonable Accommodation Procedures in compliance with EEOC’s requirements and feedback. BEP responded timely to all Office of Civil Rights and Diversity’s data calls and requirements.

Hiring, Placement and Advancement of Individuals with Disabilities

BEP takes pride in reporting that in FY 2020, BEP exceeded the Federal goal of 2% for Individuals with Targeted Disability (IWTd) and 12% for Individuals with Disability (IWD). In FY 2020, 2.3% (41 employees) of the BEP population were individuals who self-identified as IWTd, which is above the Federal goal of 2%.

For the last three fiscal years, BEP has been on an upward trend and meeting or exceeding the 2% Federal goal. In FY 2020, BEP employed 18.31% (327 employees) individuals who self-identified as IWD, which is above the Federal goal of 12%. Exceeding the Federal goals is a significant accomplishment considering that five of the major or mission-critical occupations at BEP are positions that require physical effort, exposure to heavy-duty equipment or machines and/or noise.

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Outreach and Recruitment

BEP participated in recruitment and career events targeting people with disabilities such as the Greater Washington, DC Veteran's Job Fair, Dallas Veterans Job Fair, Philadelphia Virtual Veterans Job Fair, Dallas Area Virtual Career Fair for Veterans, Maryland Statewide Career and Resource Fair, and Treasury's Office of Civil Rights and Diversity. BEP utilizes the Resume Search in Treasury's Monster account to look for veterans that may be qualified for employment at BEP. BEP also established a resume depository of Schedule A and veteran applicants and checks the repository prior to posting a job announcement.

Training

In FY 2019, BEP developed and deployed a classroom-format training on the RA process for supervisors and managers. With BEP's IWD and IWTD in mind, the goal for the training was to provide managers and supervisors the appropriate tools to be able to:

- ❖ Recognize a request for RA;
- ❖ Ensure confidentiality;
- ❖ Understand and conduct the interactive process;
- ❖ Understand and determine the essential functions of the job; and
- ❖ Understand and execute their roles and responsibilities throughout the process.

The training plan was tailored to BEP's unique workforce, which consists of 57% working in the Manufacturing areas and on a shift schedule. The training was made available throughout all three shifts to ensure maximum participation from supervisors and managers. More than 90% of supervisors and managers received training. BEP developed and provided surveys at the end of the training to capture feedback and areas of improvement. BEP will consider the results of this survey when planning for future training. In FY 2020, BEP made it mandatory for all employees, managers, and supervisors to take the virtual training on "How to Request a Reasonable Accommodation," which explained the reasonable accommodation process.

Confidentiality

When processing RA requests, BEP ensures medical documentation is only requested, when it is needed or when a medical condition is not visible. The BEP Disability Program Manager (DPM) requests, reviews and determines the sufficiency of the medical documents, if one is needed. This added another layer of confidentiality by keeping the medical information from those who do not have a need-to-know, i.e., the deciding official need not view the information unless it is absolutely necessary. OEODM developed a Medical Documentation Request Form that is used to request medical information and tailored to ask specific questions based on the request and what information is needed. OEODM established a partnership with BEP's medical provider; if the DPM cannot determine if the medical documentation is sufficient, OEODM will request the employee sign a waiver to allow BEP's medical provider to review the documentation and/or contact their medical provider, if necessary.

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Interactive Process

BEP requires deciding officials to engage in the RA process as much as possible by having them complete the RA confirmation form, research accommodation options, attend meetings during the interactive discussion, and search for vacant positions. This keeps the deciding official involved and informed through the entire process. BEP strives to provide an accommodation to the maximum extent possible.

Timeliness

As previously reported (under Efficiency), OEODM usually responds to most requests the same day they are received, and facilitates the interactive process between the employee and the deciding official. BEP requires RA processing to be completed from receipt to decision within 20 days. In FY 2020, the average processing time was seven days.

Collaborative Effort

OEODM, OHR and OCC worked together to respond to RA requests especially on complex cases such as reassignments and vacancy searches.

Centralized Funding

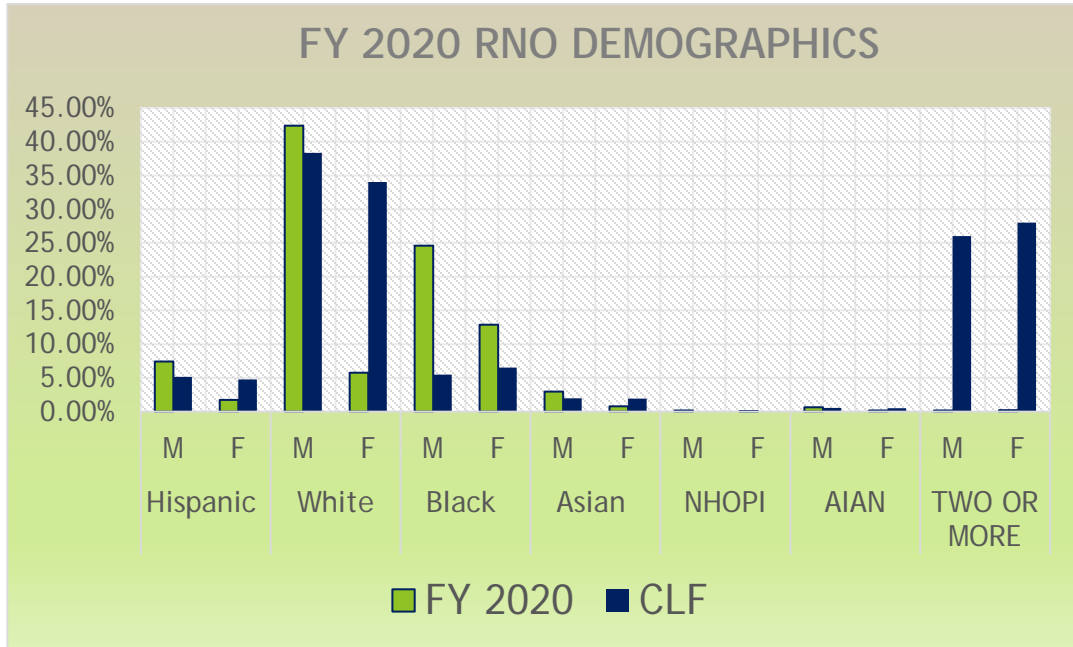
BEP established funding for RA and PAS, both under the purview of OEODM.

FY 2021 Plan of Action

- ❖ Reissue a memorandum to all employees requesting and encouraging to re-validate their disability information.
- ❖ Begin to develop a comparative table as a crosswalk between GS and Prevailing Rate pay systems to be utilized for barrier analysis purposes.
- ❖ Review personnel policies, practices, procedures, including outreach and recruitment efforts to determine what, if any, are the barriers preventing certain or all groups from fully participating in the BEP workforce.
- ❖ Review awards, recognition, promotion policies, practices and procedures to determine if there are barriers for IWD and IWTD that will potentially impact their decision to stay in the BEP workforce.

WORKFORCE ANALYSIS

Chart 6: Total Workforce by RNO



The above chart shows the overall participation rates of each demographic in BEP’s workforce. There are six groups that consistently participate in the overall BEP workforce at a lower rate than they do the National Civilian Labor Force (NCLF) since FY 2016. These groups are Hispanic females, White females, Asian females, Native Hawaiian or Other Pacific Islander females, American Indian or Alaska Native females, and males and females of two or more races.

Table 1: Senior Grades by RNO

Senior Grade Levels			TOTAL EMPLOYEES			Non-Hispanic or Latino													
			All	Male	Female	Hispanic or Latino		White		Black or African American		Asian		Native Hawaiian or Other Pacific Islander		American Indian or Alaska Native		Two or more races	
						Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
FY 2020	Total Senior Grades	#	408	264	144	18	9	143	49	72	76	27	6	1	0	3	2	0	2
		%	100	64.71	35.29	4.41	2.21	35.05	12.01	17.65	18.63	6.62	1.47	0.25	0	0.74	0.49	0	0.49
	SES or Equivalent	#	10	6	4	0	1	4	3	1	0	1	0	0	0	0	0	0	0
		%	100	60	40	0	10	40	30	10	0	10	0	0	0	0	0	0	0
	GS 15 or Equivalent	#	40	32	8	1	0	23	4	7	3	0	1	0	0	1	0	0	0
		%	100	80	20	2.5	0	57.5	10	17.5	7.5	0	2.5	0	0	2.5	0	0	0
	GS 14 or Equivalent	#	163	112	51	6	3	64	21	26	22	13	2	1	0	2	1	0	2
		%	100	68.71	31.29	3.68	1.84	39.26	12.88	15.95	13.5	7.98	1.23	0.61	0	1.23	0.61	0	1.23
	GS 13 or Equivalent	#	195	114	81	11	5	52	21	38	51	13	3	0	0	0	1	0	0
		%	100	58.46	41.54	5.64	2.56	26.67	10.77	19.49	26.15	6.67	1.54	0	0	0	0.51	0	0

A review of the table above (BEP's high grades) indicates that in the Senior Executive Service (SES) and GS15, GS14, GS13 or equivalent grades, four groups – White males, White females, Black males and Black females participate at a significantly higher rate when compared to the rest of the demographic groups. However, it appears that White males, White females and Black males are consistently present in all of the SES and GS15, GS14, GS13 or equivalent grade levels. Both males and females from these groups - Hispanic, Asian, Native Hawaiian or Other Pacific Islander, American Indian or Alaska Native, and two or more races, have either very low participation rates or not present at all in the SES and GS15, GS14, GS13 or equivalent grade levels.

Wage Grade Employees

An analysis of the demographic groups of wage grade employees shows that White males participate at consistently high rates in each of the occupation groups (KG, KL, KS, and WE) from FY 2016, through FY 2020. Although, Black males have a very good presence, they are participating at rates lower than their White male counterparts. There is no or very low participation from males of all other demographic groups.

At the KS and KG grades, four groups – White males, White females, Black males and Black females, are the only groups with very robust participation. While there is a presence of White females and Black females in all grades and pipeline grades, they are participating at rates significantly lower than their male counterparts. In contrast, females of all other demographics to include Hispanic females have low participation rates or no participations rates in all of the wage grades occupations and the pipeline grades.

In an effort to conduct a meaningful analysis inclusive of the GS and wage grades, we are working to develop a newly-established comparative table that will allow us a better view of our workforce at the high grades as well as at the pipeline grades across the overall workforce.

Major Occupations

The tables below show the demographic groups with **significant low participation rates** in each of the BEP major occupations. Occupation series **0083** (Police Officer) is the most populous occupations within BEP. BEP has designated **2210** (Information Technology Management), **2606** (Electronic Industrial Controls Mechanic), **4406** (Letter Press Operator), **4454** (Intaglio Press Operating), and **6941** (Bulk Money Handling) as mission-critical occupations. Males outnumber females significantly across all demographic groups and major occupations. Hispanic females, White females, and American Indian or Alaska Native females are the only demographic groups participating below the Civilian Labor Force (CLF) in all of BEP major occupations. Hispanic males are participating low in two (2210 and 6941) of the six major occupations. White males are participating low in four (0083, 2210, 2606, and 6941) of the six major occupations. Black males are the only demographic group participating above the CLF in all of the major occupations. Black females are participating low in two (2606, 4406) of the major occupations. Native Hawaiian or Other Pacific Islander males and females, American Indian or Alaska Native males, and two or more races are either participating low or significantly absent in all of the major occupations. From FY 2016 through FY 2020 there were no meaningful changes in the participation rates across the demographic groups in all of the major occupations.

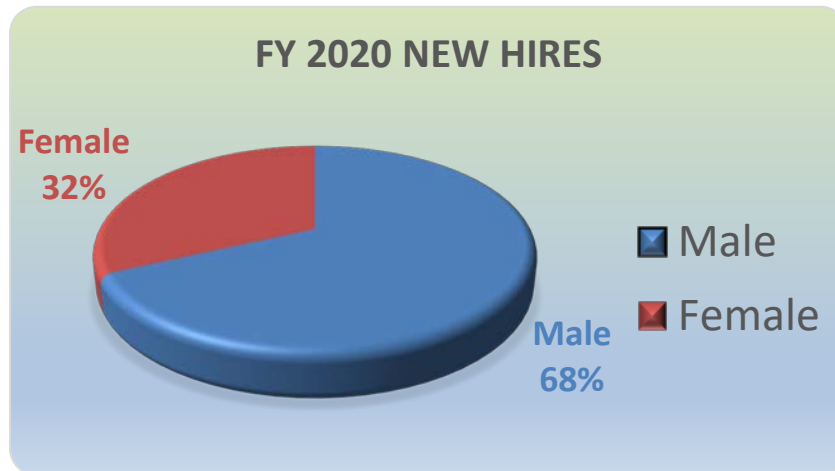
Only two of the demographic groups, White males and Black males, have continued to show a decline in each of the five years since 2016: White males in the Police Officer (0083) series; White males in the Technology Management (2210) series; and White males in Electron Industrial Controls Mechanic (2606) series; Black males in the Police Officer (0083) series; Electron Industrial Controls Mechanic (2606) series, and Letter Press Operator (4406) series. The decline of White males in the series noted above is of particular interest because recruitment for these series has been part of an ongoing campaign to increase the diversity of our Science, Technology, Engineering, and Math (STEM) workforce. Although White males and Black males participation rates showed a declining trend in three major occupations, they were still above the CLF for each of those major occupations. We will follow these groups in the aforementioned series closely for the success of those efforts with increasing participation.

Table 2: Participation in Major Occupations

Series	TOTAL EMPLOYEES			Hispanic or Latino		Non-Hispanic or Latino											
	All	Male	Female	Male	Female	White		Black or African American		Asian		Native Hawaiian or Other Pacific Islander		American Indian or Alaska Native		Two or more races	
						Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
0083	Blank																
CLF	100.00	85.20	14.80	10.10	2.20	62.50	8.50	9.00	3.50	1.90	0.20	0.20	0.00	0.90	0.10	0.60	0.10
	192	173	19	25	1	59	6	81	12	6	0	0	0	1	0	1	0
	100	90.1	9.9	13.02	0.52	30.73	3.13	42.19	6.25	3.13	0	0	0	0.52	0	0.52	0
2210																	
CLF	100.00	70.40	29.60	5.40	2.20	52.20	20.90	6.60	4.50	5.10	1.50	0.10	0.00	0.50	0.30	0.30	0.10
	64	43	21	3	0	16	8	20	10	4	3	0	0	0	0	0	0
	100	67.19	32.81	4.69	0	25	12.5	31.25	15.63	6.25	4.69	0	0	0	0	0	0
2606																	
CLF	100.00	96.70	3.30	5.20	0.20	80.60	2.30	7.50	0.20	1.90	0.20	0.10	0.00	1.00	0.50	0.40	0.00
	109	108	1	8	0	79	1	16	0	4	0	0	0	1	0	0	0
	100	99.08	0.92	7.34	0	72.48	0.92	14.68	0	3.67	0	0	0	0.92	0	0	0
4406																	
CLF	100.00	81.10	18.90	8.70	2.00	60.40	13.70	7.80	2.40	2.70	0.50	0.10	0.00	0.70	0.20	0.40	0.00
	188	184	4	17	0	146	2	17	1	2	0	0	0	1	1	1	0
	100	97.87	2.13	9.04	0	77.66	1.06	9.04	0.53	1.06	0	0	0	0.53	0.53	0.53	0
4454																	
CLF	100.00	81.10	18.90	8.70	2.00	60.40	13.70	7.80	2.40	2.70	0.50	0.10	0.00	0.70	0.20	0.40	0.00
	145	134	11	18	2	93	2	18	7	2	0	0	0	2	0	1	0
	100	92.41	7.59	12.41	1.38	64.14	1.38	12.41	4.83	1.38	0	0	0	1.38	0	0.69	0
6941																	
CLF	100.00	63.70	36.30	8.50	4.70	39.90	8.80	12.10	5.90	0.90	1.90	1.10	0.10	0.80	0.50	0.50	0.20
	170	134	36	14	4	42	8	76	23	1	1	1	0	0	0	0	0
	100	78.82	21.18	8.24	2.35	24.71	4.71	44.71	13.53	0.59	0.59	0.59	0	0	0	0	0

Accession

Chart 7: Accession by Gender



The Accession chart above shows that over 68% of all hires in FY 2020, were males. Of the 68% total male hires, 25.36% were White males and 25.36% were Black males. The increase in White male hires can be attributed to the job series for which have previously been noted as exhibiting low participation (0083, 6941). Despite the increase of hires of White males, the White male population is still below the relevant CLF (RCLF) in four (0083, 2210, 2606, 6941) of the six major occupations and it continued to decline in all six of the major occupational series (0083, 2210, 2606, 4606, 4454, 6941) in FY 2020. Black males are above the RCLF, and have also shown an increase in overall hires in three of the major occupation series (0083, 2210, 6941) in FY 2020. The accession rates of Hispanic females (5.8%), White females (10.87%), and Asian females (2.17%) remains very low when compared to their male counterparts.

Chart 8: Accession by RNO and Sex

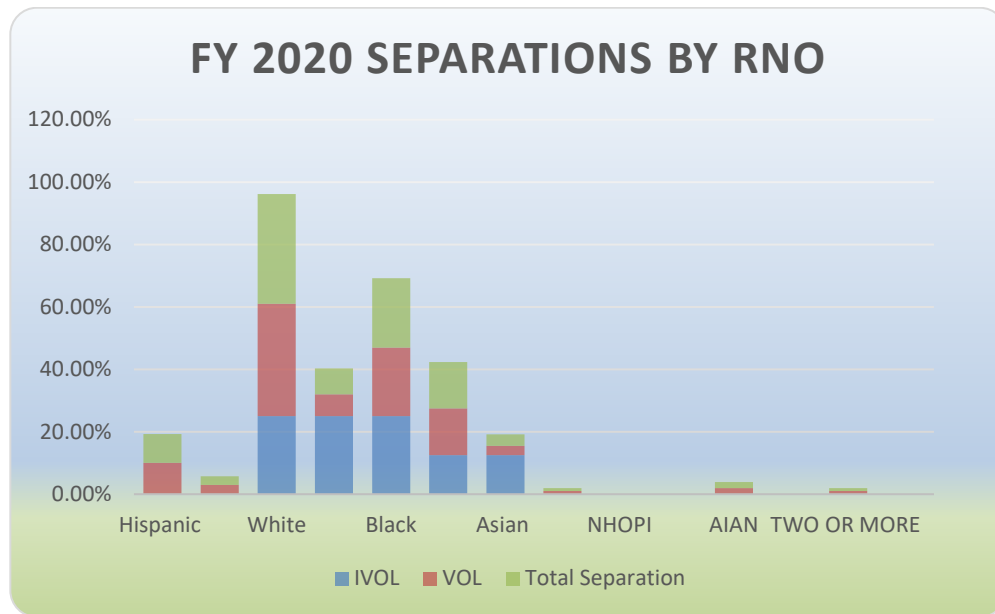


Though minimal, Hispanic males, Hispanic females, Asian males and Asian females had an upward trajectory from FY2016 to FY2020. Accession rates for the rest of the other demographic groups remained very low or nonexistent.

Separations

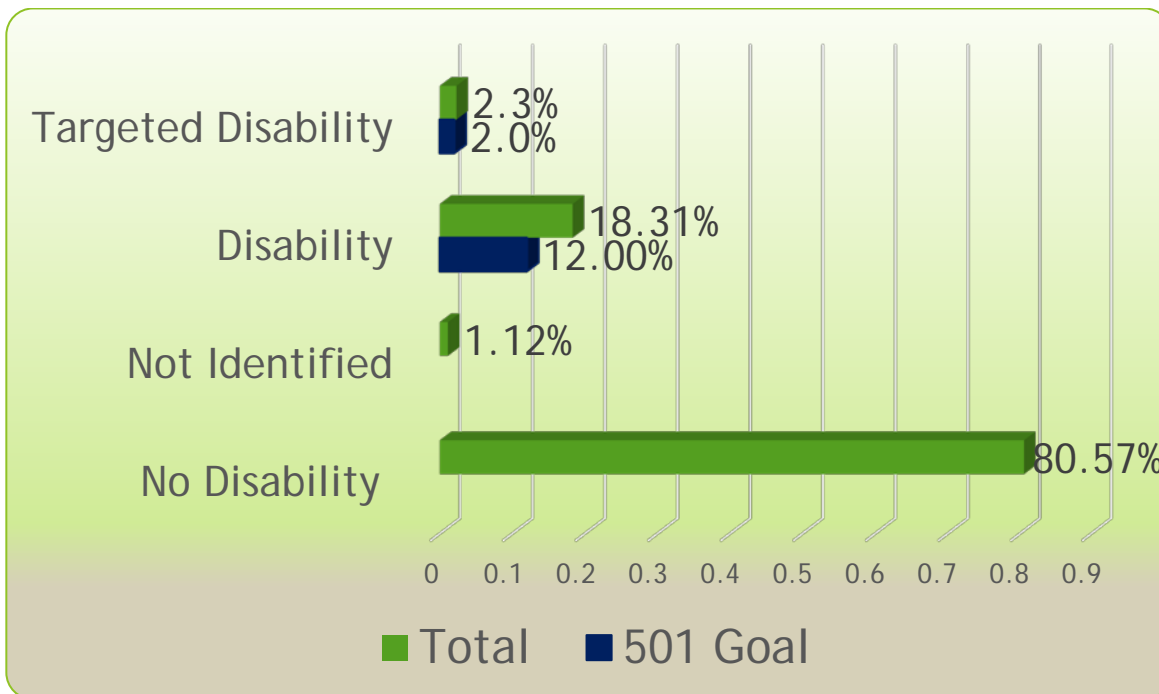
A review of the Separation table below indicates that more than 73% of all separations in FY 2020, were males. White males and Black males comprised more than 50% (57.41) of the 73.15% total male separations. When comparing the BEP accession and separation rates, White males are the only group separating at a higher rate (35.19%, 38 employees) than their accession rate (25.36%, 35 employees). Black males and Black females are separating at a rate equivalent to their accession rate. On the other hand, Asian males have shown a net gain of 100%, Asian females have shown a significant net gain of 90%, Hispanic females had a net gain of 62.5%, and White females had a minimal net gain of 40% between their accession rate and separation rate in FY2020.

Chart 9: Separations by RNO



INDIVIDUALS WITH TARGETED DISABILITIES

Chart 10: Workforce Participation by Disabilities Status



The participation rates of individuals with targeted disabilities (IWTD) and individuals with (non-targeted) disabilities (IWD) have increased in each of the last five fiscal years. In FY 2020, **2.3% (41 employees)** of the BEP population were individuals who self-identified as IWTD, which is above the Federal goal of **2%**. For the last three fiscal years, BEP has been on an upward trend and meeting or exceeding the 2% Federal goal for IWTD. In FY 2020, BEP employed **18.31% (327 employees)** individuals who self-identified as IWD, which is above the Federal goal of 12%.

In FY 2020, **1.12%** (20 employees) of the workforce chose not to identify if they have a disability. Although this is a small percentage of employees choosing not to identify, this is slightly higher than what BEP reported in FY 2019, which was 0.79% (14 employees). The 1.12% of the BEP workforce who chose not to self-identify creates the possibility that BEP may have more employees with targeted or other types of disabilities. In FY 2021, BEP will reissue a memorandum to all employees requesting and encouraging employees to re-validate their disability information. It is expected that the revalidation effort will result in an increase in IWTD and IWD participation in the workforce.

Table 3: IWTD/IWD in Pay plans

GS/GM, SES and Related Grade		TOTAL	Total by Disability Status			
			No Disability [05]	Not Identified [01]	Disability [02,03,06-99]	Targeted Disability
					12	2
GS	#	684	520	13	151	20
	%	100	76.02	1.9	22.08	2.92
TR	#	192	151	3	38	2
	%	100	78.65	1.56	19.79	1.04
ES	#	10	8	0	2	0
	%	100	80	0	20	0
Total GS All Workforce	#	886	679	16	191	22
	%	100	76.64	1.81	21.56	2.48
WG	#	900	760	4	136	19
	%	100	84.44	0.44	15.11	2.11
Total All Workforce	#	1786	1439	20	327	41
	%	100	80.57	1.12	18.31	2.3

Accessions

In FY 2020, BEP hired 2.9% (4 employees) IWTD and 28.99% (40 employees) IWD. When compared to previous year, the hires in FY 2019 were slightly higher at 5.19% (7 employees) IWTD and 31.85% (43 employees) IWD. Five of the IWD hired in FY 2020 were through utilizing Schedule A flexibilities.

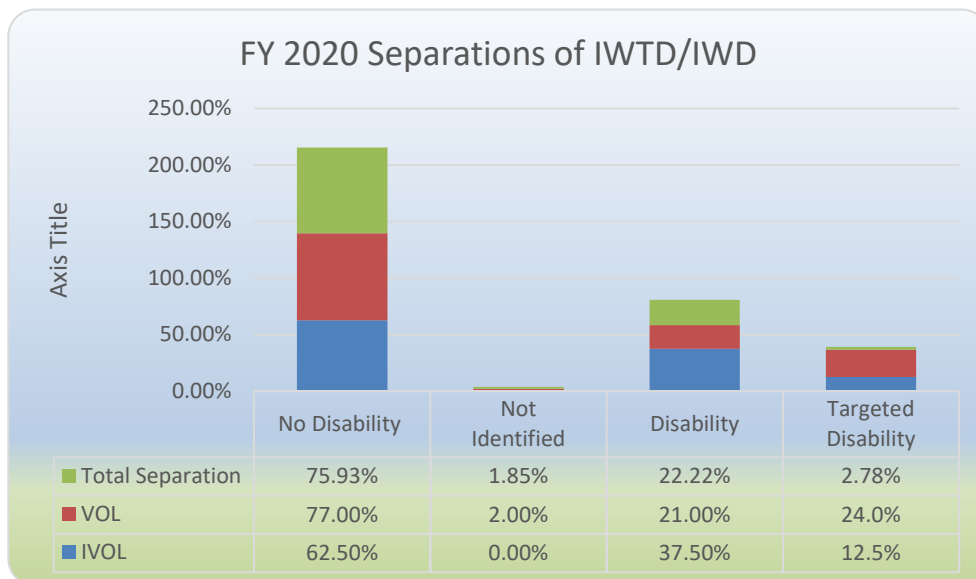
A review of the new hires in major occupations shows that 0.25% (1 employee) IWTD hired were in the 0083 series, and 30.23% (13 employees) IWD were in three of the major occupation series (0083, 2210, 6941). IWD and IWTD were above the Federal goals in two of the six major occupations (0083, 6941). On the other hand, in one of the major occupations (2606), participation rate is only above the Federal goal of 2% goal for IWTD. The other two major occupations (4406, 4454) participation rates were below both goals of 12% for IWD and 2% for IWTD.

At the senior grade levels, grades GS-13 or equivalent through GS 15 or equivalent, BEP meets both Federal goals. At the SES or equivalent level, the participation rate for IWD (19.25%, 2 employees) is above 12%, but falls below the 2% goal for IWTD (0.00%).

Separations

An analysis of separations showed that 22.22% (24 employees) of separations were IWD, and 2.78% (3 employees) were IWTD. When compared to FY 2019, there is only a 0.92% decrease in the separation rate of IWTD. A trend analysis of accessions and separations showed a 40% positive net increase in the IWD hires and separations, while IWTD are leaving at rates comparable to the rates at which they were hired.

Chart 10: Separations of IWTD/IWD







Of the 24 IWD separations, eight were resignations, five were retirement, eight were transfers, and three were discharges. One IWTD was discharged, and two resigned. An exit survey analysis of IWD and IWTD separations showed that of the four individuals that took the survey, two had more than 25 years of service and two had 10-12 years of service. Two of the four employees were GS employees, while the other two were Wage grade. Three of the four employees were non-supervisory, while the other employee was Supervisory. Two of the four employees were 60 and over, one was 50-59, and the other was 40-49. All four were males, and they were all Veterans. Two of the employees were White, one was Asian, and the other was Black or African American.

A review of the responses given for reasons for separation showed that one employee indicated promotion in another federal agency and the other indicated retirement. Of the four employees, two indicated that their work experience was generally positive, and the other two indicated that their work experience was not positive. Seventy five percent of the respondents indicated that they would not return to Treasury, or recommend Treasury as a good place to work. Twenty five percent of the respondents indicated that they would return to Treasury, and recommend it as a good place to work.



Part F

MD-715 - PART G



Agency Self-Assessment Checklist



 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
A.1 – The agency issues an effective, up-to-date EEO policy statement.			
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	10/01/2019
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	
A.2 – The agency has communicated EEO policies and procedures to all employees.			
<div style="display: flex; justify-content: space-between;"> <div style="width: 15%;">  Compliance Indicator  Measures </div> <div style="width: 35%;"></div> <div style="width: 15%; text-align: center;"> Measure Met? (Yes/No/NA) </div> <div style="width: 35%; text-align: center;"> Comments </div> </div>			
A.2.a	Does the agency disseminate the following policies and procedures to all employees:	Yes	
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes	
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	Blank
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:	Yes	
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes	
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	https://moneyfactory.gov/images/Circular_67-13.10.pdf
A.2.c	Does the agency inform its employees about the following topics:		
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often.	Yes	Employees are informed about the EEO Complaint Process annually through training, new employee orientation, informational posters about the program in common areas and breakrooms throughout BEP, and available information about the program on the internal and external webpages.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	Yes	Employees are informed about the ADR Process quarterly through training, new employee orientation, informational posters about the program in common areas and



			breakrooms throughout BEP, and available information about the program on the internal and external webpages. BEP also conducts an annual ADR week event during the month of June, which highlights the importance of ADR and conflict resolution. Additionally, BEP conducts quarterly ADR informational tables.
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	Employees are informed about the Reasonable Accommodation Program annually through training, new employee orientation, informational posters about the program in common areas and breakrooms throughout BEP, and available information about the program on the internal and external webpages.
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	Employees are informed about the Anti-harassment Program annually through new employee orientations, informational posters about the program in common areas and breakrooms throughout BEP, and available information about the program on the internal and external webpages.
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Employees are informed about the behaviors that are inappropriate in the workplace annually through training, new employee orientation, informational posters about the program in common areas and breakrooms throughout BEP, and available information about the program on the internal and external webpages.






 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	TBEP provides recognition through performance awards based on the mandatory Diversity and Inclusion and supervisory performance goals, and the use of monetary/non-monetary awards.
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	

Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION
This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.



 Compliance Indicator  Measures	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure Met? (Yes/No/NA)	Comments
As B.1.a	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office ? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related	No	



	programmatic offices? If "yes," please provide the title of the agency head designee in the comments.		
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c) (1); MD-715 Instructions, Sec. I]	Yes	
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	02/20/2020
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
B.2.d	Is the EEO Director responsible for overseeing the timely issuing final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes	
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	NA	BEP does not have any subordinate level components.

 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	BEP's Strategic Plan, Core Values: Equitable treatment of all employees, free from bias, dishonesty, or injustice.

 Compliance Indicator  Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes	
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes	
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	EEO counseling and compliance requirements only. Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	Yes	
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II (E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes	
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with	Yes	



	Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes	
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	Yes	For new EEO counselors.
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II) (C) of MD-110?	Yes	For EEO counselors.



 Compliance Indicator	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments
 Measures			New Indicator
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Yes	
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes	
B.5.a.5	ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes	

 Compliance Indicator	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments
 Measures			New Indicator
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes	
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes	



B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes	
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Yes	



Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY
This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.





 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
C.1	C.1 – The agency conducts regular internal audits of its component and field offices.		
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	Yes	OEODM partnered with the Office of Human Resources (OHR) to evaluate past MD-715 report submissions, program deficiencies, and the implementation of planned activities to eliminate the identified deficiencies. Audits by the OEODM and OHR were conducted on December 2, 2019, August 3, 19, and 27, 2020.
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	Yes	OEODM partnered with the Office of Human Resources (OHR) to evaluate past MD-715 report submissions, program deficiencies, and the implementation of planned activities to eliminate the identified deficiencies. Audits by the OEODM and OHR were conducted on December 2, 2019, August 3, 19, and 27, 2020.
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	Yes	

 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments New Indicator
C.2	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.		
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	BEP has established an Anti-Harassment Policy. Per EEOC's feedback during the Technical Assist visit in December 2020, BEP is updating the policy to include detailed procedures that include timeframes and specific responsibilities.
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement	Yes	

	Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]		
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	Yes	
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	Blank
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Yes	Blank
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	Blank
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	Blank
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	Blank
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	Blank
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	Yes	Blank
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	https://www.moneyfactory.gov/eoadr.html
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	Yes	https://www.moneyfactory.gov/eoadr.html





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





 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
C.4.b	Has the agency established timetables/schedules to	Yes	

	review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]		
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
C.4.d	Does the HR office timely provide the EEO office have timely access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes	
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes	
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes	
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes	
 Compliance Indicator  Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)	Yes	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	N/A	During FY 2020, there were no findings discrimination.
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	N/A	During FY 2020, there were no findings discrimination.
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments	Yes	Quarterly

	column.		
C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	


Essential Element D: PROACTIVE PREVENTION
This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.

 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.		
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes	
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes	
 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments New Indicator
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.	Yes	I-Complaints for complaint data, BEP exit survey results, Monster Analytics for Workforce/Applicant Flow Data, SEPM's and Employee Resource Groups, RA processing, Outside Reports, EEOC annual reports and special emphasis reports.



 Compliance Indicator	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments
 Measures			New Indicator
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes	
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes	
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes	
Blank	Blank	Blank	Blank
 Compliance Indicator	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities	Measure Met? (Yes/No/NA)	Comments
 Measures			New Indicator
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	https://www.moneyfactory.gov/eoadr.html
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes	
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	



Essential Element E: EFFICIENCY



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



 Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes	
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	N/A	Treasury’s Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	N/A	Treasury’s Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine	Yes	

	access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?		
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	The Office of Chief Counsel at BEP uploads documents through FedSEP.

 Compliance Indicator	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator
 Measures			
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.2.c	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)	N/A	Treasury's Office of Civil Rights and Diversity (ORCD) is responsible for all aspects of the formal complaint process.



 Compliance Indicator  Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	



 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:	Yes	
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes	
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes	
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes	
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes	
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	



 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	The agency used IComplaints (complaint trends), findings, RA processing, exit survey data, FEVs results and EEOC annual reports to monitor and identify significant trends in its EEO Program.
E.5.b	Does the agency review other agencies' best	Yes	The agency attends a quarterly meeting

	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.		with other Treasury bureaus to share and discuss best practices that can be implemented to improve the effectiveness of its EEO Program. For example, the Veterans and Disability Programs were enhanced as a result of these collaborations.
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	

Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE
This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

 Compliance Indicator	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments
 Measures			
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	

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

 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes	This is posted to the Treasury website by OCRD at https://home.treasury.gov/footer/no-fear-act
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes	This is posted to the Treasury website by OCRD at https://home.treasury.gov/footer/no-fear-act https://www.moneyfactory.gov/eoadr.html

PART H. Plan to Attain the Six Essential Elements of a Model Agency Program

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

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	A1, A2, A3, A4, A5, A6, A7 & A8S	(a) Hispanic females and White females have low participation in the overall BEP workforce when compared to the Civilian Labor Force (CLF). ² (b) Hispanic females and White females are below the Occupational Civilian Labor Force (OCLF) in all BEP major occupations. (c) White males are below the OCLF in four major occupations.

EEO Group(s) Affected by Trigger

EEO Group	Yes/No
All Males	No
All Females	No
Hispanic or Latino Males	No
Hispanic or Latino Females	Yes
White Males	Yes
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
American Indian or Alaska Native Females	No

² Asian females (0.78 percent vs 1.93 percent), Native Hawaiian Other Pacific Islander females (0.06 percent vs 0.07 percent) and American Indian or Alaskan Native (0.17 percent vs 0.53 percent), are also below the CLF but found to be not statistically significant. A few other groups were also below the OCLF but determined to be not statistically significant.

EEO Group	Yes/No
Two or More Races Males	
Two or More Races Females	

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	<p>Overall Workforce: As of September 30, 2020, the participation of Hispanic females and White females in the Bureau of Engraving and Printing (BEP) workforce remains below the civilian labor force (CLF). Table A1 shows that notwithstanding an increase in number for each group in fiscal year (FY) 2020, their participation numbers of 31 (1.74 percent) Hispanic females and 103 (5.77 percent) White females were still significantly lower than the CLF of 4.79 percent and 34.03 percent, respectively.</p> <p>New Hires vs. Separation Rates Of the new hires, 5.8 percent were Hispanic females and 10.87 percent were White females. The separation rate of Hispanic females was 2.78 percent (three employees) while White females was 8.33 percent (nine employees), respectively. However, their participation rates in the overall BEP workforce as stated above are still below the CLF. It is noted that there is a higher percentage of White males separating than being hired (35.19 percent vs 25.36 percent).</p> <p>Occupational Categories: A review of Table A3 reveals that Hispanic females at 0.99 percent, White females at 7.62 percent, and Hispanic males at 5.3 percent participations rates were significantly lower than the other groups (White males 48.58 percent, Black males 20.86 percent, Black females 11.92 percent) at the management level (GS 12 through GS 15 and above).</p> <p>Mission-Critical/Major Occupations: Table A6 shows that 0083 (Police Officer) is the most populous occupation within BEP. BEP has designated 2210 (Information Technology Management), 2606 (Electronic Industrial Controls Mechanic), 4406 (Letter Press Operator), 4454 (Intaglio Press Operating), and 6941 (Bulk Money Handling) as mission-critical occupations. In all the aforementioned occupations, Hispanic females and White females were both below the OCLF, while</p>

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
		<p>White males were below the OCLF in four (0083, 2210, 2606, 6941) of these occupations.</p> <p>Previous fiscal year reviews of Tables A7 and supplemental A8, applicants and hires for the major and mission-critical occupations by race/ethnicity and gender shows that between FY 2013 to FY 2019, Hispanic females and White females have been applying at a lower rate than the OCLF for occupational series 0083 availability rate. Table A6-1 V2 shows that in FY 2020, in the 0083 occupational series, there were 0.52 percent (one employee) females and 3.13 percent (six employees) White females.</p>
Complaint Data (Trends)	Yes	Complaints records did not show a trend in complaints filed by Hispanic and White females as well as White males in FY 2020.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	Yes	BEP conducted interviews with hiring managers and members of the Police Division during the previous reporting period to discuss the hiring process (outreach and recruitment), job qualifications, vacancy announcement, application flow data and application process for occupation series (0083).
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC and OPM
Other (Please Describe)	No	

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
<p>In FY 2019, BEP determined that the process of traditionally posting vacancies to USAJobs with no targeted recruitment and outreach to Hispanic and White females is a potential factor to the low participation of these groups within the BEP workforce.</p> <p>BEP will secure additional data, consult and interview appropriate stakeholders (Human Resources staff, hiring managers) and conduct a thorough analysis to determine if this is a barrier and/or why these groups are not participating in the BEP workforce comparable to the OCLF.</p>

Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yy yy)	Target Date (mm/dd/yy yy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yy yy)	Date Completed (mm/dd/yyyy)
Conduct analysis of Agency policies, practices, or procedures to determine if there are potential barriers preventing certain groups from fully participating in the BEP workforce.	12/1/2020	9/30/2021	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Chief, Office of Equal Opportunity and Diversity Management	Judy Caniban	Yes
Chief, Office of Human Resources	Karnelis Godette	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Establish a quarterly meeting with appropriate Human Resources (HR) staff to review BEP's policies, practices and procedures, document and work collaboratively to analyze the information to determine if barriers exist for certain groups preventing them from fully participating in the BEP workforce.		
09/30/2021	Partner with appropriate HR staff to conduct an assessment on areas to focus outreach and recruitment events to ensure BEP reaches out to the areas where BEP finds the most diverse and qualified potential applicants for job opportunities at BEP for mission-critical and major occupations.		
09/30/2021	Partner with appropriate HR staff to work on establishing a relationship with other Federal agencies and Minority Serving Institutions to gain insight on outreach efforts for Hispanic females and White females.		

Report of Accomplishments

Fiscal Year	Accomplishments
2020	<p>In FY 2020, BEP made good progress towards marketing the opportunities at BEP as evidenced by the total number of new hires for Hispanic females and White females in the workforce when compared to the previous fiscal year through aggressive campaign and outreach. Notwithstanding the challenge caused by the global health crisis (COVID-19), BEP conducted multiple virtual outreach and recruitment events, including on September 8, 21, 2020, and October 1, 19, 30, 2020. BEP advertised job opportunities on Handshakes, which is an online network that partners with more than 1000 colleges and universities to help students find great jobs.</p> <p>In FY 2020, compared to 1.46 percent (26) in FY 2019, the workforce participation rate for Hispanic females increased to 1.74 percent (31), a net change of 19.23, and the highest among all groups. Although not as big of an increase as Hispanic females, White females also increased from 5.68 percent to 5.77 percent, a net increase of 1.98. Data also shows positive net increase for Hispanic males, Black male, Asian males and females participation rates.</p> <p>As a result of BEP's outreach and recruitment efforts, BEP received applications for the occupational series 0083 from two Hispanic females and two White females in FY 2018, and hired one male and two females in the same occupational series in FY 2019. In FY 2020, although managers and supervisors were authorized to recruit and hire in the occupational series 0083, outreach and recruitment efforts were limited due to COVID-19.</p>

BEP incorporated OPM and BEP's specific hiring authorities to attract a more qualified and diverse pool of candidates, to include but not limited to:

- ❖ Spouses and Widows/Widowers of Certain Military Members: This authority allows agencies to appoint certain military spouses without using traditional competitive examining procedures. Agencies can choose to use this authority when filling competitive service positions on a temporary (not to exceed one year), term (more than one year but not more than four years), or permanent basis.
- ❖ Internship Program replaces the Student Career Experience Program (SCEP) and Student Temporary Employment Program (STEP): These programs are designed to provide students enrolled in a wide variety of educational institutions, from high school to graduate level, with opportunities to work in agencies and explore Federal careers while still in school and while getting paid for the work performed. Students who successfully complete the programs may be eligible for conversion to a permanent job in the civil service.
- ❖ Recent Graduates Program affords developmental experiences in the Federal Government intended to promote possible careers in the civil service to individuals who have recently graduated from qualifying educational institutions or programs. Successful applicants are placed in a dynamic, developmental program with the potential to lead to a civil service career in the Federal Government. The program lasts for one year (unless the training requirements of the position warrant a longer and more structured training program).
- ❖ Direct-Hire Authority: Allows agencies to hire qualified candidates, after public notice has been given, directly into competitive service positions without conducting a formal rating and ranking process. Limited to occupations for which OPM determines there is a severe shortage of candidates or a critical hiring need. The occupations for which OPM has granted a government-wide direct-hire authority include but not limited to: Information Technology Management (Information Security), GS-09 through GS-15; STEM positions at the GS-11 through GS-15; Cybersecurity related positions at the GS-11 through GS-15 grade levels.
- ❖ Varying Schedules: Varying work schedules such as part-time (which may include job-sharing arrangements), intermittent, and seasonal are viable options to manage a fluctuating and less than full-time workforce. The use of varying work schedules may attract applicants who prefer to work less than full-time.

MD-715 – Part J

Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

Cluster GS-1 to GS-10 (PWD) is 22.26% (59), which is above the 12% benchmark.
Cluster GS-11 to SES (PWD) is 21.03% (131), which is above the 12% benchmark.

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

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

Cluster GS-1 to GS-10 (PWTD) is 1.51% (4), which is below the 2% benchmark.
Cluster GS-11 to SES (PWTD) is 2.73% (17), which is above the 2% benchmark.

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

BEP communicated the numerical goals to hiring managers and recruiters through strategic one-on-one conversations with hiring officials, internal BEP communications to hiring officials, and executive briefings with senior officials and hiring officials.

Section II: Model Disability Program

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

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

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

Yes X No 0

The Office of Equal Opportunity and Diversity Management (OEODM) is responsible for the implementation and execution of the requirements for the Disability Program. OEODM staff are provided appropriate training and procedures to execute their responsibilities.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	13	0	0	Karnelis Godette, Chief, Office of Human Resources (Karnelis.Godette@bep.gov)
Answering questions from the public about hiring authorities that take disability into account	4	0	13	Karnelis Godette, Chief, Office of Human Resources (Karnelis.Godette@bep.gov)
Processing reasonable accommodation requests from applicants and employees			4	Judith Diaz Myers, Acting Chief, Office of Equal Employment and Diversity Management
Section 508 Compliance			2	Sharilyn Cook, Manager, Office of Enterprise Solutions
Architectural Barriers Act Compliance			1	Daniel Carver, Chief, Office of Facilities Support
Special Emphasis Program for PWD and PWTD			5	Judith Diaz Myers, Acting Chief, Office of Equal Employment and Diversity Management

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

Yes No

During FY 2020, the agency provided the disability program staff with sufficient training, which consisted of the Equal Employment Opportunity Commission’s (EEOC) Disability Program Manager training and National Employment Law Institute’s (NELI) Americans with Disability Act training.

B. Plan to Ensure Sufficient Funding for the Disability Program

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

Yes No

The agency has a Reasonable Accommodations and Personal Assistant Services budget that is managed by OEODM and is readily accessible for immediate use when needed and/or requested.

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. Plan to Identify Job Applicants with Disabilities

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

BEP's Office of Equal Employment and Diversity Management (OEODM) and Office of Human Resources (OHR) collaboratively manage an internal Schedule A repository to track, maintain, and identify qualified Schedule A applications that BEP receives.

BEP also partnered with the Department of the Treasury and Monster Government Services to create a customized job search tool that provides veterans services such as, a federal resume tutorial, a military skills translator, and a resume to job match capability.

BEP has established an outreach and recruitment team as indicated within the Diversity and Inclusion Strategic Implementation Plan. The paramount objective of the Team is to plan, identify, and implement changes that will improve opportunities for all groups within the workforce.

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

The hiring authorities that BEP uses that take disability into account are Schedule A and Veteran Appointment Authorities. Schedule A is available for use along with Veteran Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with service-connected disability rating of 30% or more.

These hiring authorities are communicated to hiring officials during mandatory Strategic Consults with all hiring officials prior to recruitment. During this consultation, the OHR and hiring officials discuss hiring authorities, including Schedule A and Veterans appointments.

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

When individuals apply for a position under the Schedule A hiring authority, the servicing HR Specialist reviews the application to determine if the applicant meets qualifications/position requirements, and has submitted the required medical documentation. Applicants deemed qualified are referred to the hiring official on a non-competitive certificate of eligibility with guidance on selection procedures, including the application of veterans' preference (where applicable). Hiring officials have the option to interview and/or hire from the certificate or to consider other candidates from other issued certificates (e.g. Merit Promotion, Non-Competitive, etc.).

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

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

Yes X No 0 N/A 0

BEP’s OHR mandates a Strategic Consult for all hiring officials prior to recruitment, whereby hiring flexibilities and authorities (including Schedule A and Veterans appointments) are encouraged and discussed.

A. 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 Computer/Electronic Accommodation Program (CAP) to secure devices frequently used by PWD and PWTD. BEP also maintains contact with interpreter service providers. BEP has also partnered with Handshake to advertise our open vacancies at education institutions that include programs for students with disabilities.

B. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)³

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

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

New Hires vs. Benchmark

PWD Hires: 28.99% vs 12%
 PWTD Hires: 2.90% vs 2%

Hiring rates for PWD and PWTD are above the benchmark goals of 12% and 2%.

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

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

FY 2020 Hires	Qualified vs. Hires	Qualified vs. Hires
0083 (24) Hires:	PWD: 9.09% - 41.67%	PWTD: 1.82% - 0.00%
2210 (9) Hires:	PWD: 20.78% - 22.22%	PWTD: 9.94% - 0.00%
6941 (13) Hires:	PWD: 24.00% - 7.69%	PWTD: 16.00% - 0.00%

New Hires PWD:

0083: There were a total of 100 external applicants, of those 8% (8) were PWD, and 62.5% (5) of the applicants were qualified PWD. Based on the data available in Data Insight, there were 24 selections made, of which 1 PWD was selected.

2210: There were a total of 565 external applicants, 19.12% (108) were PWD. 63.88% (69) of the applicants were qualified PWD. Based on the data available in Data Insight, there were 9 selections made, of which 2 were PWD.

³ Data pulled from two different sources. The report on the percentages of qualified individuals comes from the applicant flow data pulled from Monster Analytics, while the percentages of hires are pulled from Data Insight. Using two different data sources can give false triggers. This applies to all reports below reflecting applicants, qualified and selectees information.

6941: There were a total of 127 external applicants, 15.75% (20) were PWD, 60.% (12) of applicants were qualified PWD. Based on the data available in Data Insight, there were 13 selections made, of which 1 PWD was selected.

New Hires PWTD:

0083: There were a total of 100 external applicants. Of the 100 external applicants, 3% (3) were PWTD applicants. Of the three PWTD applicants, 33.33% (1) PWTD was found qualified. Based on the data available in Data Insight, there were 24 selections made, of which one PWTD was selected.

2210: There were a total of 565 external applicants. Of the 565 external applicants, 9.73% (55) were PWTD applicants. Of the 55 PWTD applicants, 60% (33) were found qualified. Based on the data available in Data Insight, there were 9 selections made, no PWTD were selected.

6941: There were a total of 127 external applicants. Of the 127 external applicants, 10.24% (13) were PWTD applicants. Of the 13 PWTD applicants, 61.54% (8) were determined to be qualified. Based on the data available in Data Insight, there were 13 selections made, no PWTD were selected.

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

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

FY 2020 Hires	Applicants vs. Qualified	Applicants vs. Qualified
0083 (1) Hires:	PWD: 0.00% - 0.00%	PWTD: 0.00% - 0.00%
2210 (5) Hires:	PWD: 0.00% - 0.00%	PWTD: 0.00% - 0.00%
2606 (4) Hires:	PWD: 0.00% - 0.00%	PWTD: 0.00% - 0.00%
4406 (6) Hires:	PWD: 0.00% - 0.00%	PWTD: 0.00% - 0.00%
6941 (13) Hires:	PWD: 0.00% - 0.00%	PWTD: 0.00% - 0.00%

Internal Hires PWD:

0083: There was 1 internal vacancy and no internal applicants. Based on the data available in Data Insight, there was 1 internal selection, no PWD selected.

2210: There was 1 internal applicant, 0 was PWD. Based on the data available in Data Insight, there were 5 selections made, no PWD selected.

2606: There were no internal vacancies. However, the data in Data insight shows that there were 4 internal selections, of the 4 selections, no PWD selected.

4406: There were no internal vacancies. However, the data in Data insight shows that there were 6 internal selections, of the 6 selections, no PWD selected.

6941: There were no internal vacancies. However, the data in Data Insight shows that there were 12 internal selections, out of which 4 were PWD.

Internal Hires PWTD:

0083: 0083: There was 1 internal vacancy with 0 internal applicants. Based on the data available in Data Insight, there was 1 internal selection, no PWTD selected.

2210: There was 1 internal applicant, 0 was PWTD. Based on the data available in Data Insight, there were 5 selections made, of the 5 selections, no PWTD selected.

2606: There were no internal vacancies. However, the data in Data insight shows that there were 4 internal selections, of the 4 selections, no PWTD selected.

4406: There were no internal vacancies. However, the data in Data insight shows that there were 6 internal selections, of the 6 selections, no PWTDD selected.

6941: There were no internal vacancies. However, the data in Data Insight shows that there were 12 internal selections, of the 12 internal selections, no PWTDD selected.

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

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

FY 2020 Hires	Qualified vs. Hires	Qualified vs. Hires
0083 (1) Hires:	PWD: 0.00% - 0.00%	PWTDD: 0.00% - 0.00%
2210 (5) Hires:	PWD: 0.00% - 0.00%	PWTDD: 0.00% - 0.00
2606 (4) Hires:	PWD: 0.00% - 0.00%	PWTDD: 0.00% - 0.00%
4406 (6) Hires:	PWD: 0.00% - 0.00%	PWTDD: 0.00% - 0.00%
6941 (13) Hires:	PWD: 0.00% - 33.33%	PWTDD: 0.00% - 0.00%

Internal Hires PWD:

0083: There was 1 internal vacancy with 0 internal applicants. Based on the data available in Data Insight, there was 1 internal promotion, no PWD.

2210: There was 1 internal applicant, 0 was PWD. Based on the data available in Data Insight, there were 5 internal promotions made, of the 5 promotions, no PWD.

2606: There were no internal vacancies. However, the data in Data insight shows that there were 4 internal promotions, of the 4 promotions, no PWD.

4406: There were no internal vacancies. However, the data in Data insight shows that there were 6 internal promotions, of the 6 promotions, no PWD.

6941: There were no internal vacancies. However, the data in Data Insight shows that there were 12 internal promotions, out which 4 were PWD.

Internal Hires PWTDD:

0083: 0083: There was 1 internal vacancy with 0 internal applicants. Based on the data available in Data Insight, there was 1 internal promotion, no PWTDD.

2210: There was 1 internal applicant, 0 was PWTDD. Based on the data available in Data Insight, there were 5 internal promotions made, of the 5 promotions, no PWTDD.

2606: There were no internal vacancies. However, the data in Data insight shows that there were 4 internal promotions, of the 4 promotions, no PWTDD.

4406: There were no internal vacancies. However, the data in Data insight shows that there were 6 internal promotions, of the 6 promotions, no PWTDD.

6941: There were no internal vacancies. However, the data in Data Insight shows that there were 12 internal promotions, of the 12 internal promotions no PWTDD.

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.

In FY 2018, BEP deployed an upward mobility program for all eligible employees, including PWD and PWTD. The program was designed for current employees who are in a position or an occupational series that has limited or no upward career mobility. The program just completed its final year of implementation in FY 2020. BEP will review current results to determine the effectiveness and identify any areas of improvements.

BEP also offers career development opportunities to all employees via non-competitive details and promotions. The career development opportunities are marketed through internal communications and external sources.

B. Career Development Opportunities

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

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

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

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

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

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

Electro-Machinist & Mechanical-Machinist Trainee Program. This program is advertised as a four-year trainee program to journeyman Electro-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.

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	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	1	0	0	0	0	0
Coaching Programs	6	1	0	0	0	0
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A

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.

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

Applicants vs. Selections

PWD: 22.36% vs. 14.29%

There were seven applicants, 2 of which were PWD. Of the 2, 1 was selected.

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

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

Applicants vs. Selections

PWD: 0.00% vs. 0.00%

None of the applicants or selections were PWTD.

C. Awards

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

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

Time Off Awards

The inclusion rate for PWD (3.12%) and PWTD (5.00%) fell slightly below the inclusion rate for employees with no disability (7.74%) for time off awards between 1 - 10 hours.

The inclusion rate for PWD (0.93%) and PWTD (2.50%) fell slightly below the inclusion rate for employees with no disability (2.96%) for time off awards between 11-20 hours.

The inclusion rate for PWD (0.00%) and PWTD (0.00%) fell slightly below the inclusion rate for employees with no disability (0.63%) for time off awards between 21-30 hours.

The inclusion rate for PWD (0.93%) and PWTD (0.00%) fell slightly below the inclusion rate for employees with no disability (1.20%) for time off awards between 31-40 hours.

Cash Awards

The inclusion rate for PWD (31.15%) in cash awards \$500 and under was slightly below the inclusion rate for employees with no disability (38.78%). The inclusion rate for PWTD (45.00%) was above the inclusion rate for employees with no disability (38.78%).

The inclusion rate for PWD (42.06%) and PWTD (47.50%) in cash awards \$501-\$999, was below the inclusion rate for employees with no disability (81.35%).

The inclusion rate for PWD (69.78%) and PWTD (117.50%) in cash awards \$1000-\$1999, was below the inclusion rate for employees with no disability (191.34%).

The inclusion rate for PWD (7.48%) in cash awards \$2000 - \$2999, was below the inclusion rate for employees with no disability (13.79%). The inclusion rate for PWTD (15.00%) was above the inclusion rate for employees with no disability (13.79%).

The inclusion rate for PWD (1.56%) in cash awards \$3000 - \$3999, was below the inclusion rate for employees with no disability (3.80%). The inclusion rate for PWTD (5.00%) was above the inclusion rate for employees with no disability (3.80%).

The inclusion rate for PWD (0.31%) and PWTD (0.00%) in cash awards \$4000 - \$4999, was below the inclusion rate for employees with no disability (1.34%).

The inclusion rate for PWD (0.00%) and PWTD (0.00%) in cash awards \$5000 or more, was slightly below the inclusion rate for employees with no disability (0.21%).

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

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

Quality Step Increase (QSI)

The inclusion rate for PWD (0.62%) and PWTD (0.00%) for quality step increase was slightly below the inclusion rate for employees with no disability (1.48%).

Performance Based Pay Increase

There were no performance based pay increases in FY 2020 for PWD, PWTD, or employees with no disabilities.

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

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

Not applicable.

D. Promotions

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

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

Applicants/Qualified/Promotions

GS-13 - PWD: 22.22% - 0.00% - 54.55%

GS-14 - PWD: 0.00% - 0.00% - 0.00%

GS-15 - PWD: 0.00% - 0.00% - 0.00%

SES - PWD: 0.00% - 0.00% - 0.00%

GS-13 or Equivalent:

For GS-13 or equivalent there were a total of 9 internal applicants. Of the 9 internal applicants, 2 were PWD, of those 0 were qualified applicants. However, the data in Data Insight shows that there were 11 internal selections made, of those 6 were PWD.

GS-14 or Equivalent:

For GS-14 or equivalent there were a total of 6 internal applicants. Of the 6 internal applicants, 0 were PWD, 0 were qualified applicants, and 0 were selected. The data in Data Insight shows that there was a total of 13 internal selections, 0 were PWD.

GS-15 or Equivalent:

For GS-15 or equivalent there was no internal vacancy. However, the data in Data Insight shows that there were 6 internal selections, 0 were PWD.

SES or Equivalent:

For SES or equivalent there was no internal vacancy. However, the data in Data Insight shows that there were 12 internal selections, 0 were PWD.

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

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

Relevant Pool/Qualified/Promotions

GS-13 - PWTD: 0.00% - 0.00% - 0.00%
 GS-14 - PWTD: 0.00% - 0.00% - 0.00%
 GS-15 - PWTD: 0.00% - 0.00% - 0.00%
 SES - PWTD: 0.00% - 0.00% - 0.00%

GS-13 or Equivalent: Same question for all of these from the previous section.

For GS-13 or equivalent there were a total of 9 internal applicants. Of the 9 internal applicants, 0 were PWTD, and 0 PWTD were qualified applicants, and 0 were PWTD selected. The data in Data Insight shows that there were 11 internal selections, 0 were PWTD.

GS-14 or Equivalent:

For GS-14 or equivalent there were a total of 6 internal applicants. Of the 6 internal applicants, 0 were PWTD, 0 were qualified applicants, and 0 were selected. The data in data Insight shows that there was a total of 13 internal selections, 0 were PWTD.

GS-15 or Equivalent:

For GS-15 or equivalent there was no internal vacancy. However, the data in Data Insight shows that there were 6 internal selections, 0 were PWTD.

SES or Equivalent:

For SES or equivalent there was no internal vacancy. However, the data in Data Insight shows that there were 12 internal selections, 0 were PWTD.

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

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

Qualified Applicants/Hires

GS-13 - PWD: 16.36% - 21.05%
 GS-14 - PWD: 10.50% - 16.67%
 GS-15 - PWD: 15.69% - 20.00%
 SES - PWD: 0.00% - 0.00%

GS-13 or Equivalent:

For GS-13 or equivalent there were a total of 437 External applicants. Of the 437 external applicants, 67 were PWD, of those 44 were qualified applicants. Based on the data available in Data Insight there was a total of 19 hires, of those 4 were PWD.

GS-14 or Equivalent:

For GS-14 or equivalent there were a total of 527 external applicants. Of the 527 external applicants, 60 were PWD, 36 were qualified applicants. Based on the data available in Data Insight there was a total of 12 hires, 2 were PWD.

GS-15 or Equivalent:

For GS-15 or equivalent there were a total of 163 external applicants. Of the 163 external applicants, 29 were PWD, and 16 were qualified applicants. Based on the data available in Data Insight there was a total of 5 hires, 1 was PWD.

SES or Equivalent:

For SES or equivalent there were no external vacancies.

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

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

Qualified Applicants/Hires

GS-13 - PWTD: 7.43% - 0.00%

GS-14 - PWTD: 4.69% - 8.33%

GS-15 - PWTD: 3.92% - 0.00%

SES - PWTD: 0.00% - 0.00%

GS-13 or Equivalent:

For GS-13 or equivalent there were a total of 437 External applicants. Of the 437 external applicants, 31 were PWTD, of those 20 were qualified applicants. Based on the data available in Data Insight there was a total of 19 hires, of those 0 were PWTD.

GS-14 or Equivalent:

For GS-14 or equivalent there were 527 external applicants. Of the 527 external applicants, 36 were PWTD, 17 were qualified applicants. Based on the data available in Data Insight there was a total of 12 hires, 1 was PWTD.

GS-15 or Equivalent:

For GS-15 or equivalent there were 163 external applicants. Of the 163 external applicants, 12 were PWD, and 4 were qualified applicants. Based on the data available in Data Insight there was a total of 5 hires, 0 were PWD.

SES or Equivalent:

For SES or equivalent there were no external vacancies.

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

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

Qualified Applicants/Promotions

Executives - PWD: 0.00% - 0.00%
 Managers - PWD: 0.00% - 27.27%
 Supervisors - PWD: 0.00% - 0.00%

There were no internal Supervisor, or Executive vacancies. For internal manager vacancies, there was a total of 5 qualified applicants, of the 5 qualified applicants 0 were PWD, and 0 PWD were selected.

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

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

Qualified Applicants/Promotions

Executives - PWTD: 0.00% - 0.00%
 Managers - PWTD: 0.00% - 0.00%
 Supervisors - PWTD: 0.00% - 0.00%

There were no internal Supervisor, or Executive vacancies. For internal manager vacancies, there was a total of 5 qualified applicants, of the 5 qualified applicants 0 were PWTD, and 0 PWTD were selected.

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

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

Qualified Applicants/Hires

Executives - PWD: 18.67% - 33.33%
 Managers - PWD: 11.24% - 33.33%

Supervisors - PWD: 0.00%- 0.00%

There were no external Supervisor vacancies.

For external manager vacancies, there was a total of 169 qualified applicants, of the 169 qualified applicants 19 were PWD, and only 2 PWD were selected.

For external executive vacancies, there was a total of 75 qualified applicants, of the 75 qualified applicants 14 were PWD, and only 1 PWD was selected.

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

- | | | |
|-------------------------------------|-------|------|
| a. New Hires for Executives (PWTD) | Yes X | No 0 |
| b. New Hires for Managers (PWTD) | Yes X | No 0 |
| c. New Hires for Supervisors (PWTD) | Yes 0 | No X |

Qualified Applicants/Hires

Executives - PWTD: 5.33% - 0.00%

Managers - PWTD: 5.92% - 16.67%

Supervisors - PWTD: 0.00%- 0.00%

There were no external Supervisor vacancies.

For external manager vacancies, there was a total of 169 qualified applicants, of the 169 qualified applicants 10 were PWTD, and 0 PWTD were selected.

For external executive vacancies, there was a total of 75 qualified applicants, of the 75 qualified applicants 4 were PWTD, and 0 PWTD were selected.

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. Voluntary and Involuntary Separations

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

Yes 0 No X N/A 0

Since FY 2018, the BEP has been actively converting eligible Schedule A employees to competitive service appointments. In FY 2018, BEP converted two Schedule A employees; in FY 2019, BEP converted six employees; in FY 2020, BEP converted three employees.

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

a. Voluntary Separations (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
b. Involuntary Separations (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

The inclusion rate for PWD (6.42%) slightly exceeded the rate of persons with no disability (5.28%) for voluntary separations. The inclusion rate for PWD (0.92%) slightly exceeded the rate of persons with no disability (0.35%) for involuntary separations.

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

a. Voluntary Separations (PWTD)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
b. Involuntary Separations (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

The inclusion rate for PWTD (4.88%) did not exceed the rate of persons with no disability (5.28%) for voluntary separations. The inclusion rate for PWTD (2.43%) exceeded the rate of persons with no disability (0.35%) for involuntary separations.

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

A trigger exists involving the voluntary separations of PWD/PWTD.

Explanation:

Using the data in the B14, there was a total of 21 voluntary separations. Of the 21 voluntary separations, 8 were resignations, 5 were retirement, and 8 were transfers. Four of the 21 separations were PWD and/or PWTD.

Of the four PWD/PWTD separations, two had more than 25 years of service, the other two had 10-12 years of service. Two of the employees were GS employees, while the other two were Wage grade. Three of the employees were non-supervisory, while the other employee was Supervisory.

Two of the four employees were 60 and over, one was 50-59, and the other was 40-49. All four were males, and they were all Veterans. Two of the employees were White, 1 was Asian, and the other was Black or African American.

Of the two responses given for reasons for separation, one employee indicated promotion in another federal agency and the other indicated retirement.

Of the four employees, two indicated that their work experience was generally positive, and the other two indicated that their work experience was not positive. 75% of the respondents indicated that they would not return to Treasury, or recommend Treasury as a good place to work. 25% of the respondents indicated that they would return to Treasury, and recommend it as a good place to work.

B. Accessibility of Technology and Facilities

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

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

Internet address: <https://moneyfactory.gov/accessibilitystatement.html>

How to file a complaint:

For information about filing a complaint against the BEP under Section 508, 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.

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.

Internet address: <https://moneyfactory.gov/accessibilitystatement.html>

How to file a complaint:

For information about filing a complaint against the BEP under the Architectural Barriers Act, 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.

An ABA complaint can be filed online using the online complaint form: https://cts.access-board.gov/formsiq/form.do?form_name=ABA%20Complaint%20Form%20-%20Facility%20Information

Alternative ABA Complaint Filing Methods

- 1) E-mail to 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.

Policy/Procedures

During FY 2020, BEP has implemented the Personal Assistant Services (PAS) Policy and Procedures. BEP has also updated the Reasonable Accommodations Procedures in accordance with the Equal Employment Opportunity Commission's technical feedback.

Budget

The agency has also created a Blanket Purchase Agreement that is available for use when PAS requests are received.

Accessibility of Facility

BEP continuously works to improve the accessibility of the parking program by ensuring an adequate number of accessible spaces are available to employees for on-site parking.

The BEP installed an accessible wheelchair ramp for entering and exiting the facility.

BEP is continuously working to install several accessible doors throughout both facilities.

Accessibility of Technology

In FY 2020, BEP awarded a new contract to ensure document remediation for internal and external websites, and transcription services for audio and video files.

BEP's 508 Remediation and Web Design groups are continuously looking at tools and technology to improve the usability of internal and external websites for hearing and visually impaired employees and customers.

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.)**

During FY 2020, there was a total of 35 reasonable accommodations requests. Of the 35 requests 18 were from the Washington, DC Facility (DCF), and 17 were from the Western Currency Facility (WCF). The total average processing time was 6.74 days.

- 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, as evidenced by timely processing of requests for accommodations. Throughout FY 2020, BEP provided reasonable accommodations guidance via training courses, and postings on its internal and external websites. Mandatory reasonable accommodation training was provided to all employees.

BEP also developed an effective partnership with internal stakeholders such as the Office of Human Resources (OHR), and the Office of Chief Counsel (OCC) as a checks-and-balance system to ensure request processing is effective and timely.

BEP also has an annual reasonable accommodation budget that is readily and easily accessible when needed. Lastly, BEP has developed an internal tracking system for reasonable accommodation requests, that's used to monitor reasonable accommodation data for trends relating to the workforce.

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

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

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

BEP established its PAS policy and procedures during FY 2019. In FY 2020, BEP included information about PAS to its mandatory Reasonable Accommodations training that was provided to all employees. Although, BEP did not receive any PAS requests during FY 2020, BEP has a budget dedicated to PAS requests. BEP also developed and implemented a PAS Contract that can be utilize when a PAS request is received.

Section VI: EEO Complaint and Findings Data

A. EEO Complaint data involving Harassment

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

Yes 0 No X N/A 0

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Yes 0 No X N/A 0

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

Not applicable.

B. EEO Complaint Data involving Reasonable Accommodation

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

Yes 0 No X N/A 0

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Yes 0 No X N/A 0

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

Not applicable.

Section VII: Identification and Removal of Barriers

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Yes X No 0

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

Yes X No 0 N/A 0

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

Trigger 1	FY 2019: PWD among voluntary and involuntary separations exceed that of PWTD. Based on FY 2020 data, adjusting this trigger to: The percentage of losses (7.32 percent) for PWTD was higher than the percentage of gains (2.90 percent) in FY 2020.	
Barrier(s)	Ongoing analysis	
Objective(s)	To conduct an in-depth analysis of BEP policies, practices, or procedures to determine what are the potential barriers to retaining PWD and PWTD in the BEP workforce.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Judy Caniban, Chief Office of Equal Opportunity and Diversity Management Karnelis Godette, Chief Office of Human Resources		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)⁴	Identify Information Collected
Workforce Data Tables	Yes	<p>Overall Workforce: Tables B1 and B2 show that as of September 30, 2020, Persons with Disabilities (PWD) at 18.31 percent and Persons with Targeted Disabilities (PWTD) at 2.25 percent exceeded the government-wide goals of 12 percent and 2 percent, respectively.</p> <p>Employee Gains vs Employee Losses: Of note is the higher percentage of PWD employee gains in FY 2020 (28.99 percent) when compared to employee losses at 7.34 percent. The percentage of losses (7.32 percent) for PWTD was higher than the percentage of gains (2.90 percent) in FY 2020. (See Table B1).</p> <p>Occupational Categories: A review of Table B3 reveals that PWD are higher than the 12 percent goal at 13.91 percent, overall management level. Specifically, this group exceeded the 12 percent goal at the mid-level (GS-13 and 14) at 17.21 percent and first level (GS-12 and below) at 14.89 percent. The PWTD group has a slightly lower participation at 1.66 percent overall management level, however this group was</p>

⁴ BEP will include all other sources of data in FY 2021 barrier analysis efforts.

		<p>above the 2 percent goal, senior level (GS15 and above) at 2.26 percent.</p> <p>Mission-Critical/Major Occupations: Table B6 shows that 0083 (Police Officer) is the most populous occupations within BEP. BEP has identified the following as critical to BEP mission: 2210 (Information Technology Management), 2606 (Electronic Industrial Controls Mechanic), 4406 (Letter Press Operator), 4454 (Intaglio Press Operating), and 6941 (Bulk Money Handling) as mission-critical occupations.</p> <p>PWD are below the 12 percent goal in the following mission-critical occupations: 4454 at 11.72 percent, 4406 at 11.70 percent, and 2210 at 9.38 percent. However, their participation exceeded in 0083 at 19.79 percent, 2606 at 19.27 percent and 6941 at 25.29 percent. PWTD are below 2 percent in the following occupations: 0083 at 1.04 percent, 4406 at 1.06 percent, and 4454 at 1.38. Their participation was higher in 2210 at 3.13 percent; 2606 at 2.75 percent and 6941 at 2.94 percent.</p>		
Complaint Data (Trends)	Yes	Our initial review shows that of the total formal complaints filed in FY 2020, 33% were complaints filed by people with disabilities. We will conduct additional reviews to determine issues or concerns common across PWD and PWTD.		
Grievance Data (Trends)				
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)				
Climate Assessment Survey (e.g., FEVS)				
Exit Interview Data				
Focus Groups				
Interviews				
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)				
Other (Please Describe)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes/No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	1. Partner with OHR to review policy, practice, and procedures (PPP) pertaining to recruitment and/or selection, promotions awards and other employment	Yes		

	actions to determine if there are barriers that potentially prevent PWD and PWTD from fully participating in the BEP workforce. Review will include major and mission-critical occupations outreach and recruitment PPP.			
09/30/2021	2. Engage OHR and other stakeholders to establish a comprehensive retention strategy for BEP employees with disabilities, to include (1) considering disability status as positive factor in hiring, promotion, or assignment decisions to the extent permitted by law, and (2) offering training, internship, and mentoring programs for PWTD to reach the senior grade levels.	Yes		
09/30/2021	3. Collaborate with OHR to establish partnerships with the following organizations: America Job Centers, State Vocational Rehabilitation Agencies, the Veterans' Vocational Rehabilitation and Employment Program, Centers for Independent Living, and Employment Network Service providers.	Yes		
Fiscal Year 2020	Accomplishments			
	<p>In FY 2020, compared to 17.09 percent (304) in FY 2019, the workforce participation rate for PWD increased to 18.31 percent (327), a net change of 7.57 percent. The PWTD participation rate also increased from 2.25 percent (40) in FY 2019 to 2.30 percent (41) in FY 2020. Of note is the higher percentage of PWD employee gains in FY 2020 (28.99 percent) when compared to employee losses at 7.34 percent. The percentage of losses (7.32 percent) for PWTD was higher than the percentage of gains (2.90 percent) in FY 2020. Notwithstanding, at the end of FY 2020, the participation rates for both groups (PWD at 18.31 percent and PWTD at 2.30 percent) are higher than the government-wide goal of 12 percent for PWD and 2 percent for PWTD.</p> <p>Training: In FY 2020, BEP made it mandatory for all of BEP employees, managers, and supervisors to take the virtual training on "How to Request a Reasonable Accommodation," which explained the reasonable accommodation process from the aspect of a requestor. We will track compliance and impact of this training in FY 2021 and assess any additional training managers, supervisors and employees need.</p> <p>Reasonable Accommodation:</p>			

- OEODM ensures medical documentation is only requested, when it is needed. OEODM EEO Specialist requests, reviews, and determines the sufficiency of the medical documents, if one is needed and submitted. This added another layer of confidentiality by keeping the medical information from those who do not have the need-to-know, i.e., the deciding official need not view the information unless it is absolutely necessary.
- To ensure efficiency of processing, BEP developed a medical documentation request form that is used to request medical information and tailored to ask specific questions based on the request and what information is needed. OEODM also has a partnership with the BEP's health unit doctor. When OEODM cannot determine if the medical documentation is sufficient, with a waiver from employee, OEODM requests the medical provider to review, if necessary.
- OEODM keeps the deciding officials engaged in the process as much as possible by having them complete the RA confirmation form, research accommodation options, attend meetings during the interactive discussion, and search for vacant positions. This keeps the deciding official involved and informed during the entire process.
- OEODM meets with the employee as many times as necessary during the interactive process to understand the request, ask questions, and gather information before we make a decision.
- OEODM responds to requests immediately and begin the interactive process with the employee and the deciding official. OEODM also ensures the employee receives a decision on the request promptly, on average within the 10-day timeframe. OEODM provides interim relief, such as temporary accommodations in situations where the permanent accommodation is not readily accessible to ensure our response is not delayed for an extensive amount of time.

Partnerships:

- OEODM partners with OHR and always engages OHR on complex RA cases such as reassignment and vacancy searches. Response from OHR on internal vacancies searches is immediate and thorough, on average response time is within one to three business days.
- The deciding officials are also engaged in the process. They put forth a lot of effort to search and inquire with their peers about positions that may not have shown up in OHR's vacancy search but might be or become available for reassignments.
- OEODM also have a good rapport and partnership with supervisors and managers in the BEP for immediate contact to find out about vacancies in their respective areas.
- OEODM also partners with other internal stakeholders in the BEP such as OCC and the Office of Safety to discuss other RA options, especially on more complex RA requests.

BEP has identified the need to establish a comprehensive retention strategy for its employees with disabilities. As previously stated, BEP has made significant progress in hiring PWD and PWTD where participation rates for both groups exceed the government-wide goal and enhanced our accommodation process. However, there is more work to be done. BEP will leverage its current successes to work with strategic partners to establish and implement a strategic plan to recruit and retain PWD and PWTD in the BEP workforce.

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

The global health pandemic (COVID-19) has severely impacted BEP's efforts to implement BEP's strategic plan and address the retention issue. BEP will continue to conduct an in-depth analysis in FY 2021.

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

None of the planned activities were completed.

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.

BEP will establish a partnership with our internal and external stakeholders to execute the planned activities, and eliminate barriers in the workforce for PWD and PWTD.