

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

a. Cluster GS-1 to GS-10 (PWD) Answer No

b. Cluster GS-11 to SES (PWD) Answer Yes

The participation rate for PWD at the GS-11 to SES grade cluster is 10.36% in FY 2018, which falls below the 12% goal.

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

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

a. Cluster GS-1 to GS-10 (PWTD) Answer No

b. Cluster GS-11 to SES (PWTD) Answer No

Grade Level Cluster(GS or Alternate Pay Plan)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	44093	6345	14.39	1990	4.51
Grades GS-11 to SES	45442	4708	10.36	1219	2.68

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

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

Section II: Model Disability Program

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

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

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

Answer Yes

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 PWTB	70	3	26	See specific bureau PART J
Answering questions from the public about hiring authorities that take disability into account	55	3	25	See specific bureau PART J
Processing reasonable accommodation requests from applicants and employees	47	5	12	See specific bureau PART J
Section 508 Compliance	144	1	5	See specific bureau PART J
Architectural Barriers Act Compliance	20	2	256	See specific bureau PART J
Special Emphasis Program for PWD and PWTB	14	1	5	See specific bureau PART J

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

Answer Yes

In FY 2018, OCRD provided multiple sessions to the bureau’s staff on the new PARTJ and use of the new MD-715 V2 workforce data tables. OCRD and the bureau’s Disability Program Managers also participated in the quarterly Federal Exchange on Employment and Disability (FEED) meetings, hosted by EEOC and Department of Labor, which educate attendees on various issues and topic related to disability. Annually, all HR professionals are required to complete online courses related to veteran’s employment, which include disability components. This training, provided by the Department of the Treasury, is mandated by Executive Order (EO) 13518. Also, HR representatives attended a reasonable accommodation (RA) refresher course, which included a disability component.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer Yes

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]		
Objective	Ensure Treasury and its bureaus RA policies and procedures are in compliance with EEOC requirements and submitted to EEOC for final approval.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Aug 30, 2018	August 24, 2018	Require bureaus to submit updated RA policies and procedures to OCRD for review and comment.
	Sep 7, 2018	September 7, 2018	OCRD will review bureau RA policies and procedures and make any recommended changes. Those RA policies and procedure requiring change will be returned to the appropriate bureau for correct.
	Mar 30, 2019		Once bureau RA policies and procedures are approved by OCRD, they will be submitted to EEOC for review and final approval.
	Jun 30, 2019		Pending EEOC’s final approval of bureau RA policies and procedures, Bureaus will post interim RA policies and procedures to internal and external websites.
			Once RA policies and procedures are approved by EEOC, bureaus post their EEOC approved RA policies and procedure to their internal and external.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	To date, OCRD has submitted the revised bureau RA policies and procedures to EEOC for BEP, FS, DO, IRS, Mint, OCC, and TIGTA. Of those submitted to EEOC, EEOC has approved OCC’s RA policies and procedures. OCRD is currently working with FinCEN, IRS-CC, OIG, SIGT, and TTB to finalize their revisions to their RA Policies and procedures.	

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, 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, excluding ongoing interpretative services, in the comments column.		
Objective	Ensure timely processing of IRS reasonable accommodation requests.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		Monitor implementation of IRS’s planned activities to eliminate untimely processing of RA requests.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

• The Workforce Recruitment Program (WRP) is continually promoted as a source for recruiting students and graduating seniors with disabilities, including disabled veterans. • The Pathways Intern Program is maximized to hire interns with targeted disabilities. • Outreach efforts with Disability and Military Student offices are routinely conducted to promote internship opportunities. • Recruitment events, fairs, and conferences are mapped for annual participation, i.e., Hiring Heroes, Federal Disability Workforce Consortium, the Department of Labor’s WRP Training, and the Treasury Department’s Veteran Employment Summit at the Treasury Executive Institute to market Treasury and its job opportunities. • As a part of Treasury’s “Be A Champion” initiative, the Disability and Veteran’s Program Managers work closely with hiring managers to identify qualified PWD and PWTD, to include disabled veterans, to non-competitively hire using Schedule A Hiring Authority.

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

Schedule A Hiring Authority is promoted and available for use along with Veteran Appointment Authorities to non-competitively appoint PWD/PWTD and veterans with a service-connected disability rating of 30% or more. The Disability Program Manager (DPM) has established numerous external partnerships with private and public organizations that assist PWD/PWTD candidates in finding meaningful employment. The DPM alerted both selecting officials and embedded HR personnel on the value of hiring external disabled applicants. Alerts were made through Saba Centra, an e-Learning product which expands remote access such as email communications, conference calls, and Department-wide online training.

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

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

Answer Yes

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

hiring manager tools are also available through ITMS.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

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

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

- a. New Hires for Permanent Workforce (PWD) Answer No
- b. New Hires for Permanent Workforce (PWTD) Answer No

Overall Treasury rates of participation are above the federal benchmark. • PWD New Hires: 14.17% vs 12.0% • PWTD New Hires: 3.15% vs 2.0%

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	187100	5.74	0.24	2.60	0.13
% of Qualified Applicants	151644	5.66	0.19	2.53	0.10
% of New Hires	3475	3.40	0.14	1.41	0.09

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

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

Data from the Treasury Workforce Analytics (WA) Table B8 (All): New hires by Occupational Series and Monster Table B8 (Management Positions by New Hires and Occupational Series) were analyzed to identify triggers among new hires, indicating the following results: FY 2018 New Hires Qualified vs. New Hires Qualified vs. New Hires 0110 (18) PWD: 3.49% - 5.56% PWTD: 1.74% - 0.00%*** 0340 (3) PWD: 5.37% - 0.00%*** PWTD: 3.36% - 0.00%*** 0343 (19) PWD: 7.71% - 21.05% PWTD: 3.33% - 0.00%*** 0501 (10) PWD: 5.88% - 10.00% PWTD: 1.78% - 0.00%*** 0511 (6) PWD: 7.18% - 50.00% PWTD: 3.35% - 0.00%*** 0570 (98) PWD: 3.14% - 9.18% PWTD: 1.19% - 1.19% 0905 (80) PWD: 5.20% - 2.50%** PWTD: 1.80% - 1.25%**

1169 (0) PWD: 3.78% - 0.00%*** PWTD: 2.33% - 0.00%*** 1811 (10) PWD: 1.58% - 10.00% PWTD: 0.88% - 0.00%* 2210 (214) PWD: 5.21% - 31.78% PWTD: 1.90% - 6.54% The following triggers were identified: *The 1811, Criminal Investigators occupation, limits the employment opportunities available for PWD based on OPM’s established medical requirements for the position. Therefore, we would expect the hiring of PWD and PWTD to be limited in this series and do not consider the lack of participation to be a trigger. **However, triggers were noted when comparing the qualified applicant flow data with the hires for PWD in the 0905 occupational series. A slight difference of 0.55% was noted for PWTD in the 0905 occupational series, however, that difference is not significant enough to be considered a trigger at this time. For the five Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART Js. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau PART Js. Treasury will monitor all bureau PART Js to ensure appropriate plans are developed to eliminate any identified barrier(s). *** When there is limited hiring there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury determined a threshold of 20 new hires. Any participation less than 20, will not support a realistic outcome. The occupations with limited hiring 0110, 0340, 0343, 0501, 0511, and 1169, did not have enough hires to determine if there is an actual trigger. (*1811 is an exception as stated above). NOTE: It is important to note that when the Department looks at aggregated Treasury-wide data, the progress noted may not accurately reflect the true progress of each bureau. The consolidated view of the data may mask where potential barriers still exist within some of the bureaus. Therefore, a detailed barrier analysis based on bureau specific data into possible glass ceilings, blocked pipelines, and glass walls must be conducted by each of the bureaus. OCRD directed the bureaus to complete detailed analyses to determine if any PWD or PWTDs are facing a potential glass ceiling, blocked pipeline, or glass wall; and, based on their findings, to develop plans to eliminate identified barriers.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0110ECONOMIST	2537	2.56	0.08	1.54	0.04
0340PROGRAM MANAGEMENT	3635	3.14	0.17	1.27	0.03
0343MANAGEMENT PROGRAM ANALYST	29273	4.46	0.04	1.73	0.02
0501FINANCIAL ADMINISTRATION AND PROGRAM	20215	4.67	0.09	1.97	0.02
0511AUDITING	2231	3.05	0.09	1.93	0.04
0570BANK EXAMINER	4259	1.74	0.26	0.68	0.05
0905GENERAL ATTORNEY	4933	3.53	0.04	1.32	0.00
1169REVENUE OFFICER	2080	1.97	0.10	1.06	0.10
1811CRIMINAL INVESTIGATING	6283	0.48	0.02	0.22	0.02
2210INFORMATION TECHNOLOGY	104741	5.51	0.06	2.55	0.03

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

- a. Qualified Applicants for MCO (PWD) Answer Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

Data from Monster Table B6 (Mission-Critical Occupations), was analyzed to identify triggers among qualified internal applicants, indicating the following results: FY 2018 Hires Internal Applicants Internal Applicants to MCO vs. Qualified vs. Qualified 0110 (11) PWD: 5.26% - 3.70%*** PWTD: 2.63% - 3.70% 0340 (229) PWD: 6.26% - 5.67%** PWTD: 2.47% - 2.18%** 0343 (320) PWD: 5.99% - 5.55%** PWTD: 2.24% - 2.07%** 0501 (326) PWD: 5.14% - 4.89%** PWTD: 2.03% - 1.79%** 0570 (1) *** PWD: 1.98% - 2.27% PWTD: 0.79% - 0.91% 0905 (9) *** PWD: 4.35% - 5.00% PWTD: 0.00% - 0.00% 1169 (30) PWD: 2.44% - 1.27% *** PWTD: 0.49% - 0.64% 1811 (48) PWD: 1.93% - 0.58%* PWTD: 1.35% - 0.58%* 2210 (543) PWD: 7.50% - 7.35%** PWTD: 3.16% - 3.28%** The following triggers were identified: *The 1811, Criminal Investigators occupation, limits the employment opportunities available for PWD and PWTD based on OPM’s established medical requirements for the position. Therefore, we would expect the hiring of PWD and PWTD to be limited. **We noted differences when comparing the applicant flow data with the qualified applicants for PWD and PWTD in the 0340, 0343, 501 and 2210. However those differences are less than 1% and not considered triggers at this time. For Treasury bureaus that noted the same triggers in their workforce evaluation, these triggers are noted in their PART Js. Plans to improve hiring for PWD within the major occupations listed are detailed in the specific bureau PART Js. Treasury will monitor all bureau PART Js to ensure appropriate plans are developed to eliminate any identified barriers. *** When there is limited hiring there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury determined a threshold of 20 new hires. Any participation less than 20 will not support a realistic outcome. For those occupations with limited hiring in 0110, 0570, 0905, and 1169, there were not enough hires to determine if there is an actual trigger.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
 - a. Promotions for MCO (PWD) Answer No
 - b. Promotions for MCO (PWTD) Answer No

Data from the Treasury WA Table B6 (Participation Rates for Mission Critical Occupations) and Monster Table B6 (Participation Rates for Mission-Critical Occupations) were analyzed to identify new hires, indicating the following results: FY 2018 Hires Qualified Qualified to MCOs vs. Internal Promotions vs. Internal Promotions 0110 (1) PWD: 3.70% - 0.00% * PWTD: 3.70% - 0.00%* 0340 (229) PWD: 5.67% - 8.30% PWTD: 2.18% - 2.18% 0343 (320) PWD: 5.55% - 9.38% PWTD: 2.07% - 2.19% 0501 (326) PWD: 4.89% - 9.82% PWTD: 1.79% - 2.15% 0570 (1) PWD: 2.27% - 0.00% * PWTD: 0.91% - 0.00% 0905 (9) PWD: 5.00% - 0.00% * PWTD: 0.00% - 0.00% 1169 (30) PWD: 1.27% - 1.25% PWTD: 0.64% - 0.31% 1811 (48) PWD: 0.58% - 4.17% PWTD: 0.58% - 0.00% 2210 (543) PWD: 7.35% - 14.55% PWTD: 3.26% - 3.50% The following triggers were identified: While there are no noted triggers at the Treasury level, those Treasury bureaus that noted triggers in their workforce evaluation are noted in their PART Js. Plans to improve hiring for PWD/PWTD within the major occupations listed are detailed in the specific bureau PART Js. Treasury will monitor all bureaus’ PART Js to ensure appropriate plans are developed to eliminate any identified barriers. * When there is limited hiring, there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates. Therefore, Treasury determined a threshold of 20 hires or less is not enough hires to expect that all groups would be hired at rates comparable to their qualification rates. For those occupations (0110, 0570 and 0905) with limited hiring, there were not enough hires resulting in internal promotions to determine if there is an actual trigger.

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

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

A. ADVANCEMENT PROGRAM PLAN

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

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

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

B. CAREER DEVELOPMENT OPPORTUNITES

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

The Department of Treasury does not have a formal Career Development Program. However, Treasury bureaus have established varied opportunities to further develop the careers of employees, including PWD and PWTD. The below highlights some programs offered. To view the exhaustive list, please see bureau specific reports. The Bureau of Engraving offers a series of programs for GS 7-15. Programs include: • The New Leaders Program (GS 7-11 employees or equivalent). This program focuses on developing future public service leaders and includes leadership self-assessments, experiential learning, and individual development opportunities integrated into a competency-based learning approach. • The Executive Leadership Program (GS 12-13 employees or equivalent). This program enhances support to organizational mission and goals, focusing specifically on the competency of "leading people" through developmental activities and experiences. • The Executive Potential Program (GS 14-15 employees or equivalent), a competency-based leadership program that prepares high-potential employees to focus on leading change effectively at the senior level. • The Career Development Program (GS-11 and below or equivalent), provides to employees whose positions offer limited promotion potential, upward mobility via defined career training using individual career development plans for training and other opportunities for placement into positions in other occupational series for which they would not otherwise be qualified. Departmental Offices partners with the Treasury Executive Institute (TEI) to offer employees individual coaching services for a six-month period. TEI's coaching services assist DO employees to achieve professional goals, solve individual leadership challenges, and develop leadership attributes. Fiscal Service (FS) offers career development training courses to its employees in career ladder positions to enhance their eligibility for potential promotion to higher grades. In-person and online classes enable FS employees to develop skills to help them advance and qualify for other positions. IRS offers career development opportunities service-wide to all employees for non-competitive details/promotions and internal merit promotions. In addition, leadership development opportunities are available for all employees. IRS Chief Counsel offers training and development opportunities for attorneys Counsel-wide. Reasonable accommodations are made for all training. The Mint offers Manufacturer Certification and Apprenticeship programs and Operator Certification and Apprenticeship programs which are available to PWD and PWTD. The OCC offers at least three professional development programs for its bank examiners. Non-examiners are also exposed to career forums that provide a variety of career options in the non-examiner lines of business. Additionally, OCC offers the 0905 occupational series cross-training and developmental assignments to equip attorneys with legal skills and experience across multiple legal practice areas through the Honors Attorney Program. Overall, training and development courses are available to all employees, in the classroom, online, virtual, and self-study. Temporary details and short-term work assignments are advertised to all employees on the agency's Opportunities Board. TIGTA's programs include: • The Office of Audit's Leadership Development Program for Auditors in Grades GS-13, GS-14, and GS-15 allows qualified diverse employees to participate in career development training, and opportunities that will prepare them for Audit management vacancies. • The Office of Investigations provides diverse employees an opportunity to participate in their Equity, Diversity, and Inclusion Program, which offers career development opportunities for all employees. • Career developmental opportunities using rotational assignments and business unit details are also encouraged for all TIGTA employees. TIGTA communicates vacancy announcements and detail opportunities to all employees, including PWD/PWTD through email, intranet, and internet. TTB's primary career development program (CDP) is the Emerging Leaders Program (ELP) – a competitive three year centralized training program available to employees at the Assistant Administrator level. During the 4th quarter of each fiscal year, TTB broadcasts an ELP annual opportunity announcement to request applicants for the Program. The announcement provides general information about the ELP and its three programs, identifies the three year curriculum for each program, and explains how employees may apply. The TTB ELP framework consists of three separate and distinct programs: - Program for non-supervisory employees - Program for 1st level supervisors - Program for 2nd level supervisors and senior leaders All TTB employees, including disabled veterans, are eligible for consideration for the ELP and may apply during the annual announcement period. Selections are made through a competitive process. TTB's Training and

Professional Development Division chairs a meeting with senior leaders and provides its recommendations for selection. Senior leaders make the final selections.

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						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

The IRS SES Candidate Development Program indicated the following triggers for any career development programs: Relevant Applicant Pool Applicants Selections GS 14 - 15s (PWTD): 2.60% 5.79% 2.50%

C. AWARDS

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

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

The Department analyzed data from the Treasury WA Table B9 against the inclusion rate indicating the following triggers: The inclusion rate for PWD (12.08%) and PWTD (13.26%) fell slightly below the inclusion rate for employees with no disability (14.67%) for time off awards between 1 - 9 hours. The inclusion rate for PWD (5.87%) and PWTD (5.95%) fell slightly below the

inclusion rate for employees with no disability (6.31%) for time off awards between 31- 40 hours. The inclusion rate for PWD (19.48%) and PWTD (18.72%) in cash awards \$1,000 - \$1,999, was below the inclusion rate for employees with no disability (27.90%). The inclusion rate for PWD (2.31%) and PWTD (2.00%) in cash awards \$2,000 - \$2,999, was below the inclusion rate for employees with no disability (3.95%).

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	13003	10.88	87.90	3.41	7.47
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	20735	13.12	85.56	3.92	9.20

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	19294	14.07	85.93	4.01	10.06
Cash Awards: \$501+: Total Cash Awards Given	49785	10.06	89.94	2.87	7.19

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

The inclusion rate for PWD (2.43%) and PWTD (2.41%) was below the inclusion rate for employees with no disability (3.64%) for QSI awards.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	2939	9.87	90.13	2.82	7.04
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. SES
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer Yes

- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No

Data from the Treasury WA Table B7 Applicants and Hires by Disability and the Monster (M) B7 – Applicants and Hires by Senior Grade Levels were analyzed to identify qualified internal applicants and/or selectees for promotion to senior grade levels with disabilities, indicating the following results: Qualified Internal Promotions (WA) Applicants vs Selectees (M) GS-13 PWD: 4.06% 3.58% 11.53% GS-14 PWD: 6.77% 5.96% 10.27% GS-15 PWD: 6.34% 5.17% 10.96% SES PWD: 23.08% 5.56% 16.67%*
 *Triggers were identified for PWD selections at the SES level when looking at both internal selections and promotions. The trigger was noted between the rate at which applicants were qualified (23.08%) and their rate of selection (5.56%) when analyzing the tables (M). However, we also note that when analyzing the additional table for promotion/conversion (WA), rates for PWD at the SES level exceeded their selection rate as well. While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentage of the Qualified Applicant Pool, the Selection and the Promotions are the result of existing employees who applied not only to internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2018. This will also result in differences between internal/external selections and promotions rates.

2. Does your agency have a trigger involving PWT/D among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
 - i. Qualified Internal Applicants (PWT/D) Answer No
 - ii. Internal Selections (PWT/D) Answer Yes
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWT/D) Answer No
 - ii. Internal Selections (PWT/D) Answer Yes
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWT/D) Answer No
 - ii. Internal Selections (PWT/D) Answer No
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWT/D) Answer Yes
 - ii. Internal Selections (PWT/D) Answer No

Data from the Treasury WA Table B7 Applicants and Hires by Disability and the Monster (M) B7 – Applicants and Hires by Senior Grade Levels were analyzed to identify qualified internal applicants and/or selectees for promotion to senior grade levels with targeted disabilities, indicating the following results: Qualified Internal Promotions (WA) Applicants vs Selectees (M) GS-13 PWTD: 3.53% 0.97% * 2.28% GS-14 PWTD: 2.82% 2.66% 2.60% GS-15 PWTD: 3.35% 2.89% * 1.83% SES PWTD: 7.69% * 5.56% * 0.00% The following triggers were identified: *Triggers were identified for PWTD selections at the GS-13, GS-15 and SES level. The triggers were noted between the rate at which applicants were qualified and their rate of selection (M). However, we also note that when analyzing the additional table for promotion/conversion (WA), rates for PWTD at the GS-15 and SES level are lower than their selection rate. While there were internal vacancy announcements that reflect the applicant flow data, the significant difference in the percentages of the Qualified Applicant Pool, the Selections and the Promotions are the result of existing employees who applied to not only internal vacancy announcements, but to all status vacancy announcements open to all Federal employees in FY 2018. This will also result in differences between internal/external selections and promotions rates.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

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

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

c. Supervisors

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

Data from the Treasury WA Table B8 New Hires by Disability and the Monster B8 – (Management Positions by New Hires and Occupational Series) Applicants and Hires were analyzed to identify qualified internal applicants and/or selectees for promotion to supervisory positions, with disabilities, indicating the following results: Supervisory positions Qualified Applicants Promotions Executives PWD: 5.56% 11.31% Managers PWD: 0.00% 9.77% Supervisors PWD: 0.00% 9.98% There were no internal-only Manager and Supervisor vacancy announcements in FY 2018. The selection for promotions noted above are the result of existing employees applying to all status vacancy announcements open to all Federal employees in FY 2018.

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

a. Executives

- i. Qualified Internal Applicants (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer Yes

b. Managers

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

c. Supervisors

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

Data from the Treasury WA Table B8 New Hires by Disability and the Monster B8 – (Management Positions by New Hires and Occupational Series) Applicants and Hires were analyzed to identify qualified internal applicants and/or selectees for promotion to supervisory positions, with targeted disabilities, indicating the following results: Supervisory Positions Qualified Applicants Promotions Executives PWTD: 5.56% 1.81%* Managers PWTD: 0.00% 2.14% Supervisors PWTD: 0.00% 2.67% There were no internal-only Manager and Supervisor vacancy announcements in FY 2018. The selection for promotions noted above are the result of existing employees applying to all status vacancy announcements open to all Federal employees in FY 2018. However, the following trigger was identified: *The promotion/conversion rate for PWTD at the Executive level is lower than their qualified rate. NOTE: It is important to note that when the Department looks at Treasury-wide data as a whole, the progress noted may not be an accurate reflection of the true progress of each bureau. The consolidated view of the data may mask where potential barriers still exist within some of the bureaus. Therefore, a detailed barrier analysis based on bureau specific data into possible glass ceilings, blocked pipelines and glass walls must be conducted by each of the bureaus. OCRD expressed to the bureaus requirements to complete detailed analyses to determine if any PWD or PWTDs are facing a potential glass ceiling, blocked pipeline or glass wall; and based on their findings, develop plans to eliminate identified barriers.

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

- a. New Hires for Executives (PWD) Answer No
- b. New Hires for Managers (PWD) Answer No
- c. New Hires for Supervisors (PWD) Answer No

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

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

Data from the Treasury WA Table B8 New Hires by Disability and the Monster B8 – (Management Positions by New Hires and Occupational Series) Applicants and Hires were analyzed to identify qualified external applicants and/or selectees for new hires to supervisory positions, with targeted disabilities, indicating the following results: Supervisory Positions Qualified External New Hires Applicants Executives PWTD: 2.78% 3.70% Managers PWTD: 2.28% 4.00% Supervisors PWTD: 30.00% 0.00%* The following triggers were identified: *While 30% of the external applicants with a targeted disability in our supervisory positions were qualified, an external applicant was not hired.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

In FY 2018, Treasury had 65 Schedule A employees who were eligible for conversion to competitive service appointments. Of that: • 57 were timely converted to career status; • 5 are untimely (2 pending conversion and 3 pending personnel action); • 1 was not converted based on unsatisfactory performance; and • 2 were voluntarily separated.

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

- a. Voluntary Separations (PWD) Answer Yes
- b. Involuntary Separations (PWD) Answer No

The inclusion rate for PWD (11.41%) exceeded the inclusion rate of persons with no disability (9.08%) for voluntary separations. When evaluating the types of voluntary separations, we noted that 59% were due to retirement, 5% were transfers and 30% were resignations. The remaining 5% were due to death. Based on comments in the FY 2018 Treasury Employee Exit Survey and the explanation cited below in question #4, Treasury does not consider the separations “due to retirement” a trigger. However, each bureau where a trigger has been identified will be asked to evaluate those voluntary separations due to transfers, and resignations, along with information gleaned from their exit survey, to determine if these triggers are a potential barrier.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permenant Workforce	91179	12.39	87.61
Total Separations	9225	14.89	85.11

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Voluntary Separations	622	13.67	86.33
Involuntary Separations	8603	14.98	85.02

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

- a. Voluntary Separations (PWTD) Answer Yes
- b. Involuntary Separations (PWTD) Answer No

The inclusion rate for PWTD (11.17%) exceeded the rate of persons with no disability (9.08%) for voluntary separations. When evaluating the types of voluntary separations, we noted that 59% were due to retirement, 5% were transfers and 30% were resignations. The remaining 5% were due to death. Based on comments in the FY 18 Treasury Employee Exit Survey and the explanation cited below in question #4, Treasury does not consider the separations “due to retirement” a trigger. However, each bureau where a trigger has been identified will be asked to evaluate those voluntary separations due to transfers and resignations, along with information gleaned from their exit survey, to determine if these triggers are a potential barrier.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permenant Workforce	91179	3.57	96.43
Total Separations	9225	4.15	95.85
Voluntary Separations	622	3.05	96.95
Involuntary Separations	8603	4.23	95.77

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

When evaluating the types of voluntary separations, we noted that 59% were due to retirement, 5% were transfers and 30% were resignations. The remaining 5% were due to death. Treasury does not consider the separations “due to retirement” a trigger. However, bureaus will be asked to evaluate those voluntary separations due to transfers and resignations, along with information gleaned from the exit survey, to determine if these triggers are potential barrier. During the period of October 1, 2017 through September 30, 2018, 254 permanent/seasonal PWD responded to the Department’s Exit Survey. The overall responses from PWD were similar to the overall permanent/seasonal employee responses, in that 41% (105) had more than 25 years of service and 78% (198) were age 50 or older. Of the respondents with disabilities, 32% (82) were disabled veterans. The most frequently cited reason for separation of PWD was retirement (149 or 59%). The factor most frequently cited as impacting a PWD’s decision to leave was job stress (69%). Additional factors frequently cited include office morale (60%); office organization and alignment with regard to effective and efficient service (51%); resources to do the job (50%); access to developmental opportunities (53%); ability to participate in decisions (48%); pay in relation to job responsibilities and performance (47%) reasonableness of workload (50%); and, job description in relation to actual duties and responsibilities (45%). Separately, 74% of the respondents indicated their work experience was generally positive; 61% stated they would be interested in returning to work for Treasury; and, 67% stated they would recommend Treasury as a good place to work.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

The “Accessibility” page on the public Treasury.gov website, <https://home.treasury.gov/utility/accessibility>, provides three links

with resources for Persons with Disabilities. Information on how to file a complaint can be found at: <https://www.treasury.gov/about/organizational-structure/offices/Mgt/Pages/discrimination-complaint.aspx> The following address, located on the Treasury.gov public website, provides information and explains employee and applicant rights under Section 508 of the Rehabilitation Act: <https://section508.gov/manage/laws-and-policies>. Additionally, the following link (which is also located on the "Accessibility" page), provides information regarding how to file a complaint of discrimination: https://www.treasury.gov/about/organizational-structure/offices/Mgt/Documents/Section508_Complaint_Processing.pdf.

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

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

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

In FY 2018, OCRD conducted two accessibility reviews of buildings occupied by DO employees – 717 14th Street and 1801 L Street. At 717 14th Street, a Treasury-leased space, the accessibility review indicated a number of important requirements are not being met. OCRD identified forty-eight (48) deficiencies requiring a corrective action. The review was signed by the OCRD Director and submitted to the Deputy Assistant Secretary for Operations on July 10, 2018. For 1750 Pennsylvania Avenue, also a Treasury-leased space, the review indicated that the space was mostly accessible. OCRD identified twenty-nine (29) deficiencies that required a corrective action. The review was signed by the OCRD Director and submitted to the Deputy Assistant Secretary for Operations on October 5, 2018. OCRD is monitoring the completion of work to correct identified deficiencies. In FY 2019, OCRD will conduct two accessibility reviews on DO leased properties located at 1722 I Street and the Colorado Building. In addition, OCRD will conduct an accessibility review of the external program conducted by Fiscal Service.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

Each bureau is responsible for independently processing their requests for reasonable accommodations. The average time frame (number of days) for processing within the bureaus for FY 2018 are: BEP 04 DO 20 FinCEN 14 FS 06 Mint 08 IRS 76 OCC 07 TIGTA 10 TTB 13 The overall average for processing the Departments initial requests for reasonable accommodations is 18 days. The Department recognizes the high average for IRS which is currently reviewing its methodology for calculating "average days for providing reasonable accommodations." Treasury developed an implementation plan to acquire a Treasury-wide reasonable accommodation tracking system that will eliminate the need to manually calculate processing timeframes.

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

The Department has an effective Disability Program, supported by various policies, procedures, and practices, as evidenced by overall timely processing requests for accommodations. Mandatory training for new managers and supervisors includes responsibilities on providing reasonable accommodations. Throughout FY 2018, bureaus provided reasonable accommodations guidance via training courses, newsletters, and postings on its intranet websites (see specific bureau submission for details). The Department manages a Treasury-wide contract that provides an effective and efficient procedure for providing sign language

interpreter services. Bureaus are responsible for monitoring reasonable accommodation data for trends relating to the workforce.

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

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

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

Treasury established its PAS policy and procedures during FY 2018; however, Treasury did not receive any requests for PAS. Training will be provided to all managers, supervisors, and selected HR Professionals throughout FY 2019. PAS training will be added to orientation for all newly-hired managers and newly-promoted managers.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer Yes

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

Treasury had one final agency decision involving harassment based on disability and reprisal. This case resulted in an order of training and consideration of disciplinary action. Complainant appealed the AJ’s order and a settlement agreement was reached resolving all matters.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer Yes

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

Five Findings - (3) Final Agency Decisions (FAD) and (2) Administrative Judge (AJ) final order. FADs: (1) Disability

discrimination for failure to provide reasonable accommodation – training was ordered and provided; disciplinary actions were ordered to be considered and are pending. (2) Disability discrimination for failure to provide reasonable accommodation - provision of the software was provided; training was ordered and provided; and disciplinary actions were ordered to be considered and provided in the form of an oral counseling. (3) Disability discrimination for unreasonable delay in providing ergonomic chair - training was ordered and provided. AJ Final Orders: (4) Disability discrimination for harassment and termination during probationary period in mixed motive case - training and consideration of discipline were ordered to be considered; complainant appealed; and agency and Complainant entered into settlement agreement resolving all matters. (5) Hostile work environment in reprisal for prior EEO activity - no training or consideration of disciplinary action was ordered due to separated responsible management official.

Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer N/A

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

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

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

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

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

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

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

eliminate identified barriers.