

**Office of the Comptroller of the Currency
Annual Equal Employment Opportunity
and Diversity Program Status Report**

MD-715 Summary Report

Fiscal Year 2013 Accomplishments & Fiscal Year 2014 Plan

Introduction

The Office of the Comptroller of the Currency (OCC) is required by Congress and the Equal Employment Opportunity Commission's (EEOC) Management Directive 715 to submit an annual report on its diversity and equal employment opportunity (EEO) program activities. This report summarizes the OCC's "Annual Equal Employment Opportunity and Diversity Program Status Report (MD-715)" for fiscal year 2013 accomplishments and fiscal year 2014 plan.

As of October 5, 2013, the OCC had 3,971 employees (3,919 permanent and 52 temporary), a 3.1 percent increase from fiscal year 2012 (3,710 permanent and 143 temporary). While all EEO groups experienced a positive net growth in population, the OCC has participation rates that are below the national civilian labor force (NCLF) rates among white females, Hispanics, Native American females, Native Hawaiian males, and persons of two or more races. Other major groups with low workforce participation rates were female bank examiners, individuals with targeted disabilities, and females and minorities in supervisor roles and senior-level positions (SLP) (see table 1).

The OCC recognizes that the continued success of its mission depends on the employment of talented staff with high levels of expertise. To maintain a competent, highly qualified workforce, the OCC is committed to fully using its employees' skills as well as recruiting the best talent available from a variety of sources. The OCC is also committed to maintaining an inclusive culture and workplace environment with a diversity strategy that focuses on leadership commitment, recruitment, development, retention, work-life balance, and culture.

In fiscal year 2013, the OCC made progress in addressing the following key areas:

- Increasing the number of Hispanic employees in the OCC workforce.
- Increasing the number of female bank examiners in the OCC workforce.
- Increasing the number of individuals with disabilities and individuals with targeted disabilities in the OCC workforce.
- Increasing the number of females and minorities in supervisor roles and SLPs in the OCC workforce.
- Developing a system to collect and track diversity-related data on applicants for entry-level bank examiner positions.
- Increasing the use of alternative dispute resolution (ADR) during the EEO pre-complaint process.

Areas of Focus in Detail

Hispanic Employees

The OCC continues to work diligently to address the low participation of Hispanics in its workforce. In fiscal year 2013, the OCC experienced an increase in Hispanic participation to 6.6 percent from 6.3 percent in fiscal year 2012 and 5.1 percent in fiscal year 2005. The workforce participation rate of Hispanic bank examiners increased from 6.0 percent to 6.3 percent in fiscal year 2013; the occupational CLF (OCLF) comparator, however, also increased from 3.8 percent to 6.8 percent as a result of new census and labor force data. For the first time in several years, Hispanics are now participating below the bank examiner OCLF rate. Hispanic participation in the two other major occupational groups remained consistent from fiscal year 2012— above the OCLF rates for attorneys and below the OCLF rates for economists. Hispanic male bank examiners and economists were hired at rates exceeding their OCLF rates.

The Hispanic turnover rate increased from 5.2 percent in fiscal year 2012 to 5.4 percent in fiscal year 2013; turnover remains below the workforce participation rate (6.6 percent) and hiring rate (8.6 percent) (see table 2).

The OCC continued to benefit from its Hispanic employee network group, the Hispanic Organization for Leadership and Advancement (HOLA). In the fall of 2013, HOLA, in partnership with other employee network groups, hosted a national panel titled “Advancing Your Career: Specialty Areas and Opportunities” as part of its career advancement and retention initiative. In addition, HOLA continued to use its SharePoint site, HOLA Connected, to facilitate the exchange of information and advice, and promote mentoring relationships among members.

In fiscal year 2014, the OCC continues to focus on increasing the participation rate of Hispanics, with special emphasis on external hiring opportunities in job series currently underrepresented in Hispanics. The OCC also continues to collaborate with HOLA to foster retention and developmental programs.

Female Bank Examiners

The OCC continues to work toward increasing the number of female bank examiners in its workforce. The OCC’s population of female bank examiners increased from 38.8 percent in fiscal year 2012 to 39.2 percent in fiscal year 2013 but remains below their OCLF rate of 45.3 percent.

In fiscal year 2013, female bank examiners were hired (35.1 percent) below their OCLF rate (45.3 percent) and hiring rates (36.0 percent) in fiscal year 2012. The separation rate (35.1 percent) of female bank examiners was below their workforce participation rate (39.2 percent) but above their rate of separation in fiscal year 2012 (31.9 percent).

Resignations accounted for 51.5 percent of those separating, while retirements accounted for 45.5 percent. Exit survey responses cited travel requirements, job stress, pay, office morale,

heavy workload, and career growth as the greatest factors affecting female bank examiner separations (see table 3).

Efforts to identify and address barriers to the hiring and retention of female bank examiners include collaboration between the OCC's Office of Minority and Women Inclusion (OMWI) and Bank Supervision management on targeted recruitment and retention strategies, such as enhancing current recruitment sources for entry- and experienced-level female bank examiners; advertising with targeted professional organizations for specialty skills; using the agency's Boomerang program to encourage former bank examiners to return to the OCC; offering referral bonuses for successful, experienced external bank examiner hires; and partnering with The Women's Network (TWN), an OCC employee network group, to sponsor mentoring and networking activities to support female bank examiner retention. In fiscal year 2013, TWN held mentoring circles on relevant topics like "Career Exploration & Interviewing," "Work-Life Balance," and "Uniform Commission Examination (UCE) Preparation." In addition, the OCC's annual Career Forum provided three-year pre-commissioned examiners with information about bank examiner career opportunities and the UCE and cross-credential preparatory processes. Of the 36 OCC pre-commissioned examiners who successfully passed the UCE in fiscal year 2013, 52.8 percent were female, compared with 44.4 percent in fiscal year 2012. Of the 255 OCC examiners who successfully passed the cross-credential test in fiscal year 2013, 38.8 percent were female.

Individuals With Disabilities

In fiscal year 2013, the OCC hired 35 individuals with disabilities, representing 7.7 percent of the OCC's total hires, an increase from 6.4 percent in fiscal year 2012. The permanent workforce population of individuals with disabilities remained stable at 5.0 percent. The workforce participation rate for individuals with targeted disabilities also remained stable at 0.3 percent in fiscal year 2013. The OCC continued to explore ways to recruit individuals with targeted disabilities to reach the U.S. Department of the Treasury's goal of 2.0 percent workforce participation. Agency efforts included participation in career fairs; reaching out to potential candidates through the Internet and through organizations that support individuals with disabilities for permanent employment, summer hiring programs, and internships; creating more learning dialogues for understanding and supporting individuals with disabilities such as brown bag lunches and roundtable discussions with hiring managers and senior management; and sponsoring disability awareness month activities for all employees (see table 4).

Females and Minorities in Supervisor Roles and Senior-Level Positions

In fiscal year 2013, the participation of females and minorities in supervisor and SLPs was below their participation rates in the workforce, and it remains an area of challenge for the OCC. Generally, there were increases in the participation rates of females and minorities in supervisor roles and SLPs. White females exceeded their workforce participation rate in SLPs but declined in supervisor positions; nearly all minority groups increased their participation rates in supervisor roles but declined in SLPs between fiscal years 2012 and 2013.

The EC has established an agency-wide strategic initiative, Leading, to address continuity in leadership. The Leading initiative will focusing on diversity and career development by developing a framework for succession planning, identifying training and developmental needs for managers and supervisors, and creating a process for identifying external career development opportunities. A Leadership Development Advisory Board has been established to provide ongoing guidance for leadership development (see tables 5 and 6).

Tracking System

In fiscal year 2008, the OCC implemented the applicant-tracking module of the Career Connector system to collect and track diversity-related applicant data for all OCC vacancies, except entry-level bank examiner positions. In January 2013, the OCC expanded the use of Career Connector to collect and track applicants for entry-level bank examiner positions. The OCC now can track and monitor diversity-related demographic information on all applicants for employment.

Alternative Dispute Resolution

The Treasury Department set a goal for bureaus to process at least 45.0 percent of EEO pre-complaints through ADR in lieu of EEO counseling. The OCC promoted its ADR program in its updated ADR brochure and made it available to all staff via the OCC's intranet; held mandatory training for new managers, training team leaders and assistants, and all new hires; and disseminated information and outreach highlights during Dispute Prevention Week on the electronic message board at OCC Headquarters and in "What's New at the OCC," during OMWI's Headquarters open house, and in the December 2013 edition of *SuperVisions*.

In fiscal year 2013, the OCC's ADR participation rate decreased to 19.0 percent from 35.3 percent in fiscal year 2012. The decline in participation is largely due to an increase in the number of cases ineligible for ADR. The OCC does not offer ADR for pre-complaints involving non-selection of an external applicant, termination, criminal activity, fraud, waste, and abuse; 47.6 percent of the OCC's pre-complaints were ineligible for ADR.

In fiscal year 2014, the agency will conduct a Managers Forum on "Negotiating in Conflict" and highlight ADR as part of the series of management training initiatives, continue to evaluate how to remove potential barriers to ADR, and analyze cases in which ADR was not used.

Model Equal Employment Opportunity and Diversity Program Elements

Commitment and Integration

On May 7, 2013, Comptroller of the Currency Thomas J. Curry issued the agency's annual EEO policy statement, reiterating the OCC's commitment to EEO, diversity, and maintaining a workplace free of harassment. The agency's OMWI Executive Director meets regularly with the Comptroller and routinely reviews EEO and diversity agenda items with the Human Capital Subcommittee of the EC.

Senior managers receive annual reports titled “State of the Workforce” and “State of Diversity,” which cover retirement patterns, skill gap assessments, recruitment and hiring, training and career development, leadership and management development, pay, benefits, performance, promotions, and retention.

The OCC has 11 full-time EEO and diversity staff members. The agency also has five employee network groups: the Network of Asian Pacific Americans, HOLA, the Coalition of African-American Regulatory Employees, TWN, and the Gay, Lesbian, and Straight Alliance.

Accountability

Managers, supervisors, and EEO officials are accountable for the effective implementation of the agency’s EEO and diversity programs and plans. The OMWI Executive Director meets regularly with the senior leadership team in the Office of Management and Human Resources to share information; discuss the agency’s personnel programs, policies, and procedures; and ensure that the OCC meets its EEO requirements.

The OCC conducts periodic reviews of its merit promotion program policy and procedures, employee recognition and awards program, and programs for employee development and training to address deficiencies or concerns.

Mandatory orientation sessions for new managers, training team leaders and assistants, and all new hires include information on policy statements and procedures related to EEO, ADR, anti-harassment, and diversity. This information is also posted on the OCC intranet and in prominent locations at OCC Headquarters, district offices, and field offices. All new employees receive mandatory No FEAR Act training within 60 days of hiring.

The performance plans of all OCC managers include an element on EEO that focuses on the manager’s ability to establish and maintain a nondiscriminatory and regulatory-compliant work environment, fair and inclusive recruitment and retention strategies, and support for a workplace where all employees can contribute fully and achieve their greatest potential. A manager cannot achieve the highest overall performance rating without receiving the highest rating in all elements, including the element on EEO.

In fiscal year 2013, the OCC served as administrator for the Treasury Shared Neutrals program, which provides skilled mediators to resolve workplace disputes.

The OCC used an online exit survey to gauge the demographic profile of employees voluntarily separating from the agency, their overall work experience, and reasons for leaving. Of the 126 respondents, 93.7 percent were positive about their work experience; 79.0 percent would work for the OCC again; and 93.7 percent would recommend the OCC as a good place to work. The demographic profile of survey respondents in most cases was similar to the OCC’s respective workforce profiles as a whole.

In 2013, the OCC participated in the Office of Personnel Management’s annual Federal Employee Viewpoint Survey to measure employees’ views on topics pertaining to diversity,

family-friendly culture, leadership, pay and benefits, teamwork, and training and development. More than 2,000 OCC employees completed the survey, a 66.0 percent response rate. OCC employees' ratings were more favorable than respondents in the Treasury Department and the federal government as a whole, and remained essentially the same from the 2012 survey. OCC employees rated their satisfaction with their work experience, immediate supervisor, work/life, leadership, and agency experience as most favorable.

Proactive Prevention and Efficiency

The OCC has sufficient staffing, funding, and authority to comply with the time periods established by federal regulations for processing EEO complaints of employment discrimination. The agency has an efficient and fair process for resolving disputes in the workplace and has a system for evaluating the effectiveness of its complaint processing program. In fiscal year 2013, the OCC processed all of its informal complaints in a timely manner, with a 33.3 percent closure rate. OCC analysis showed that the most common bases for EEO complaints were race, reprisal, and sex. The most common issues were nonselection, harassment (nonsexual), termination, assignment of duties, and evaluation/appraisal.

Compliance

The OCC continues to ensure that agency personnel are accountable for full compliance with EEO statutes and regulations, policy guidance, and other written instructions. The OCC's performance standards hold managers accountable for complying with EEOC guidelines. The OCC submitted all quarterly ADR reports and its annual "Statistical Report of Discrimination Complaints" in a timely manner. The OCC remains committed to providing fair and just employment and taking proactive steps to eliminate barriers to equal opportunity.

About This Report

This report summarizes the OCC's "Annual Equal Employment Opportunity and Diversity Program Status Report" that was submitted to the EEOC through coordination with the Treasury Department, under the EEOC's Management Directive 715.

For additional information on the OCC's EEO and Diversity and Inclusion Program, please contact OMWI at (202) 649-6460.

Table 1: OCC Workforce Profile as of October 5, 2013

	Total	Male	Female	Asian male	Asian female	Black male	Black female	Hispanic male	Hispanic female	Small ERI groups male	Small ERI groups female	White male	White female
OCC workforce	3,919	54.4%	45.6%	3.9%	3.5%	5.9%	10.8%	3.4%	3.2%	0.8%	1.2%	40.5%	27.4%
2010 NCLF		51.9%	48.1%	2.0%	1.9%	5.5%	6.5%	5.2%	4.8%	0.9%	0.9%	38.3%	34.0%
Examiner	2,636	60.8%	39.2%	2.9%	2.9%	5.0%	6.3%	3.8%	2.5%	0.8%	0.8%	48.2%	26.7%
2010 examiner OCLF		54.7%	45.3%	3.7%	4.0%	3.6%	8.7%	3.1%	3.7%	0.3%	0.6%	44.1%	28.3%
Attorney	179	55.3%	44.7%	2.8%	3.3%	2.2%	2.8%	4.5%	2.8%	0.6%	0.0%	45.2%	35.7%
2010 attorney OCLF		66.7%	33.3%	1.8%	1.8%	2.1%	2.6%	2.5%	1.8%	0.5%	0.4%	59.7%	26.7%
Economist	68	61.8%	38.2%	16.2%	19.1%	0.0%	1.5%	2.9%	1.5%	0.0%	0.0%	42.6%	16.2%
2010 economist OCLF		67.1%	32.9%	4.5%	3.1%	2.8%	2.7%	3.3%	1.8%	0.7%	0.2%	55.8%	25.2%
All other series	1,036	37.3%	62.7%	5.7%	4.0%	9.1%	24.1%	2.3%	5.1%	0.4%	1.0%	19.8%	28.5%
2010 all other series NCLF		51.9%	48.1%	2.0%	1.9%	5.5%	6.5%	5.2%	4.8%	0.9%	0.9%	38.3%	34.0%

Source: MD-715 workforce data table as of October 5, 2013.

Note: Small Ethnicity and Race Indicator (ERI) Groups are Native Americans, Native Hawaiians, and persons of two or more races. EEO groups in red font are below parity with 2010 national and occupational CLF.

Table 2: 5-Year Trend—Hispanic Profile

			2009	2010	2011	2012		2013
Bank examiner	Hires	3.8% 2000 OCLF	10.3%	4.5%	3.4%	5.6%	6.8% 2010 OCLF	7.8%
	Separations		5.0%	6.3%	5.4%	4.4%		4.8%
	OCC workforce participation %		6.1%	6.2%	5.9%	6.0%		6.3%
Attorney	Hires	3.5% 2000 OCLF	0.0%	20.0%	14.3%	14.3%	4.3% 2010 OCLF	0.0%
	Separations		0.0%	25.0%	0.0%	0.0%		0.0%
	OCC workforce participation %		8.5%	6.9%	6.3%	7.1%		7.3%
Economist	Hires	5.1% 2000 OCLF	20.0%	0.0%	0.0%	0.0%	5.1% 2010 OCLF	20.0%
	Separations		0.0%	0.0%	0.0%	0.0%		20.0%
	OCC workforce participation %		3.8%	3.6%	4.8%	4.5%		4.4%
All other series	Hires	10.7% 2000 NCLF	7.5%	16.7%	3.1%	14.6%	10.0% 2010 NCLF	10.5%
	Separations		14.0%	4.8%	8.9%	3.1%		6.4%
	OCC workforce participation %		4.7%	5.2%	5.0%	7.0%		7.4%

Source: MD-715 workforce data table as of October 5, 2013.

Note: The comparator for “all other series” workforce participation and hires of EEO groups is compared with the 2000 and 2010 NCLF. Likewise, for EEO groups within specific job occupations, the comparator is that group’s participation in the 2000 and 2010 OCLF for workforce participation and hires. Separation rates are compared with each group’s workforce participation rate by occupation.

Table 3: 5-Year Trend—Female Bank Examiner Profile

			2009	2010	2011	2012		2013
Female	Hires	42.4% 2000 OCLF	44.5%	39.8%	41.6%	36.0%	45.3% 2010 OCLF	35.1%
	Separations		34.7%	43.0%	32.7%	31.9%		35.1%
	OCC workforce participation %		41.0%	40.8%	38.7%	38.8%		39.2%
Asian female	Hires	2.8% 2000 OCLF	1.3%	6.8%	4.5%	2.4%	4.0% 2010 OCLF	3.2%
	Separations		3.3%	1.4%	2.4%	2.9%		0.5%
	OCC workforce participation %		2.3%	2.5%	2.6%	2.6%		2.9%
Black female	Hires	6.9% 2000 OCLF	4.5%	2.3%	5.6%	6.8%	8.7% 2010 OCLF	7.8%
	Separations		6.6%	5.6%	6.3%	5.9%		5.8%
	OCC workforce participation %		6.3%	6.2%	5.9%	6.0%		6.3%
Hispanic female	Hires	1.6% 2000 OCLF	5.8%	0.0%	1.1%	2.4%	3.7% 2010 OCLF	2.1%
	Separations		1.7%	4.2%	3.4%	2.0%		2.7%
	OCC workforce participation %		2.9%	2.7%	2.4%	2.5%		2.5%
Native American female	Hires	0.2% 2000 OCLF	0.6%	0.0%	0.0%	0.0%	0.3% 2010 OCLF	0.0%
	Separations		0.0%	0.7%	0.0%	0.0%		0.5%
	OCC workforce participation %		0.3%	0.3%	0.4%	0.4%		0.5%
White female	Hires	30.3% 2000 OCLF	31.6%	30.7%	29.2%	23.2%	28.3% 2010 OCLF	21.6%
	Separations		23.1%	31.0%	20.5%	21.1%		25.0%
	OCC workforce participation %		28.9%	28.8%	26.9%	26.9%		26.7%

Source: MD-715 workforce data table as of October 5, 2013.

Note: For EEO groups within specific job occupations, the comparator is each group's participation in the 2000 and 2010 OCLF for workforce participation and hires. Separation rates are compared with each group's workforce participation rate.

Table 4: 5-Year Trend—Individuals With Targeted Disabilities

		2009	2010	2011	2012	2013
Individuals With Targeted Disabilities (Treasury Goal: 2%)	Hires	0.4%	0.0%	0.0%	0.0%	0.2%
	Separations	0.6%	0.9%	1.0%	0.6%	0.4%
	OCC workforce participation %	0.4%	0.3%	0.4%	0.3%	0.3%

Source: MD-715 workforce data table as of October 5, 2013

Note: The comparator for workforce participation and hires is the Treasury Department's goal, and the comparator for separations is the workforce participation rate.

Table 5: Fiscal Years 2012 and 2013—OCC Participation in Supervisor Positions

	FY2012 OCC workforce participation	FY2012 OCC supervisor participation	FY2013 OCC workforce participation	FY2013 OCC supervisor participation	Net change
Female	45.9%	36.1%	45.6%	37.4%	+1.3%
Male	54.1%	64.0%	54.4%	63.2%	-0.8
Minority female	17.7%	10.2%	18.2%	12.0%	+1.8%
Minority male	12.8%	10.8%	13.9%	11.9%	+1.1%
Minority	30.5	21.3%	32.1	24.3%	+3.0%
Asian	6.2%	4.2%	7.4%	6.0%	+1.8%
Black	16.1%	10.6%	16.7%	10.5%	-0.1%
Hispanic	6.3%	5.4%	6.6%	7.0%	+1.6%
Native American	0.8%	0.3%	1.0%	0.3%	-
White	69.6%	79.0%	67.9%	76.5%	-2.5%
White female	28.2%	25.8%	27.4%	25.2%	-0.6%
White male	41.4%	53.2%	40.5%	51.3%	-1.9%
Total	3,678	310	3,919	313	+3

Source: OCC HR Data Mart as of October 5, 2013.

Note: EEO groups in red font are below parity with workforce participation rates. Green shading indicates positive net from fiscal year 2012 to fiscal year 2013.

Table 6: Fiscal Years 2012 and 2013—OCC Workforce Profile, SLP and Feeder Grades

	OCC workforce participation rate		Ratio change	NB V (equivalent to GS-13)		Ratio change	NB VI (equivalent to GS-14)		Ratio change	NB VII (equivalent to GS-15)		Ratio change	NB VIII-IX (equivalent to SLP)		Ratio change
	FY12	FY13		FY12	FY13		FY12	FY13		FY12	FY13		FY12	FY13	
Female	45.9%	45.6%	-0.3%	43.5%	44.8%	+1.3%	37.9%	38.5%	+0.6%	36.3%	38.4%	+2.1%	29.2%	32.6%	+3.4%
Male	54.1%	54.4%	+0.3%	56.5%	55.2%	+12.7%	36.9%	61.5%	+24.6%	63.7%	61.6%	-2.1%	70.8%	67.3%	-3.5%
Minority	30.5%	32.1%	+1.6%	33.3%	34.7%	+1.4%	22.2%	23.3%	+1.1%	16.4%	17.4%	+1.0%	14.6%	14.2%	-0.4%
Asian	6.2%	7.3%	+1.1%	7.3%	8.4%	+1.1%	6.7%	7.9%	+1.2%	4.8%	5.2%	+0.4%	0.0%	0.0%	0.0%
Black	16.0%	16.7%	+0.7%	17.3%	17.8%	+0.5%	9.7%	9.5%	-0.2%	7.4%	6.8%	-0.6%	12.5%	12.2%	-0.3%
Hispanic	6.3%	6.6%	+0.3%	6.4%	6.5%	+0.1%	4.4%	5.1%	+0.7%	3.8%	4.8%	+1.0%	2.1%	2.0%	-0.1%
Native American	0.8%	1.0%	+0.2%	1.4%	1.6%	+0.2%	0.7%	0.8%	+0.1%	0.3%	0.3%	0.0%	0.0%	0.0%	0.0%
White female	28.2%	27.4%	-0.8%	27.0%	26.9%	-0.1%	26.4%	26.7%	+0.3%	28.6%	29.3%	+0.7%	25.0%	28.6%	+3.6%
White male	41.3%	40.5%	-0.8%	39.7%	38.3%	-1.4%	51.4%	50.0%	-1.4%	55.0%	53.2%	-1.8%	60.4%	57.1%	-3.3%
Total	3,678	3,919	+241	1,134	1,215	+81	1,155	1,199	+44	311	310	-1	48	49	+1

Source: MD-715 workforce data table as of October 5, 2013.

Note: EEO groups in red font are below parity with workforce participation rates. Green shading indicates positive net change from fiscal year 2012 to fiscal year 2013.