

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

MD-715 Summary Report

Fiscal Year 2016 Accomplishments and Fiscal Year 2017 Plans

Introduction

The Office of the Comptroller of the Currency (OCC) is required by Congress and the Equal Employment Opportunity Commission’s 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 2016 accomplishments and fiscal year 2017 plans.

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

As of September 30, 2016, the OCC employed 3,958 people, an increase of 3.6 percent from the 3,819 employees as of September 30, 2015. At the end of fiscal year 2016, all major EEO groups were at or near parity with the 2010 national civilian labor force (NCLF) rates,¹ with the exception of females and Hispanics. See table 1, “OCC Workforce Profile, Five-Year Trend.”

In addition, the U.S. Department of the Treasury provided a more realistic benchmark comparison for the OCC’s overall workforce—the relevant civilian labor force (RCLF) rate. This customized RCLF rate is based on the OCC’s occupational composition and total workforce annually. The 2016 RCLF was calculated by comparing the occupational civilian labor force (OCLF) availability rate from the 2010 census data with the percentage availability rate of each occupation represented in the OCC’s workforce as of September 30, 2016. See table 2, “OCC Workforce Profile as of September 30, 2016, Compared with RCLF Rates.”

Although the OCC continued to work to address the low participation of Hispanics in its workforce, their overall participation rate remained below their NCLF rate. Hispanic

¹ NCLF data are derived from the 2010 census reflecting persons 16 years of age or older who are employed or are actively seeking employment and adjusted for citizenship, excluding those in the armed services. The OCC’s workforce demographics benchmark comparisons are made against the 2010 NCLF availability rates and occupational CLF (OCLF) availability rates for the OCC’s three major occupational groups—bank examiners, attorneys, and economists. OCLF data are a subset of NCLF data by specific occupational groups. See table 1 for more details.

participation rates are below parity in the following occupational positions—female economists (1.1 percent versus 1.8 percent), female bank examiners (2.7 percent versus 3.7 percent), and males “all other series” (3.0 percent versus 5.2 percent). Similarly, females generally across EEO groups (see table 8) and Asian males (3.6 percent versus 3.7 percent) in bank examiner positions participated below their OCLF rates. See table 3, “OCC Workforce Profile as of September 30, 2016,” and table 8, “OCC Female Bank Examiner Profile by EEO Groups, Five-Year Trend.” In addition, the OCC continued to focus on the low participation rates of females and minorities in supervisor roles and senior-level positions (SLP).

Over the last five years, the OCC’s hiring rates for Asians, Blacks, and males have consistently been above their NCLF rates. Female, Hispanic, Small Ethnicity and Race Indicator (ERI) groups,² and White hiring rates, however, have generally been below their NCLF rates. In fiscal year 2016, the OCC continued to benefit from targeted diversity recruitment for entry-level and experienced bank examiner positions, which resulted in the OCC’s hiring rates for females and Hispanics increasing by 7.1 and 2.0 percentage points, respectively, from fiscal year 2014. See table 4, “OCC Hires, Five-Year Trend.”

In four of the last five years, females, Asians, and Blacks separated below their average workforce participation rates. Comparatively, males and Whites separated consistently above their average workforce participation rates. In fiscal year 2016, males, Hispanics, and Whites separated at rates above their average workforce participation rates. There was a 5.0 percent net decrease in separations in fiscal year 2016 from fiscal year 2015. See table 5, “OCC Separations, Five-Year Trend.”

Males, Asians, and Hispanics received promotions at rates above or near their average workforce participation rate in four of the last five years, compared with females and Blacks, who were generally below their average workforce participation rates. In fiscal year 2016, the OCC had 404 promotions, with all EEO groups receiving promotions at rates near (within 2 percentage points) or above their average workforce participation rates. See table 6, “OCC Promotions, Five-Year Trend.”

In fiscal year 2016, the OCC focused on 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.
- Increasing the use of alternative dispute resolution (ADR) during the EEO pre-complaint process.

² Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Areas of Focus in Detail

Hispanic Employees

The OCC continued to address the low participation rate of Hispanics in its workforce. In fiscal year 2016, the OCC slightly increased its Hispanic participation rate to 6.9 percent, from 6.8 percent in fiscal year 2015, an improvement from 5.1 percent in fiscal year 2005 (the OCC's baseline year). Even though the agency has made progress, the OCC's Hispanic workforce participation rate (6.9 percent) remains below the NCLF rate of 10.0 percent, but it is close to the RCLF rate of 7.3 percent. The OCC conducted an applicant tracking analysis by ethnicity (Hispanic versus non-Hispanic) for all vacancy announcements closed during the first three quarters of fiscal year 2016 and all entry-level bank examiner recruitment campaign positions closed in 2016. The analysis reflected no statistically significant shift for Hispanics in the applicant pool as applicants progressed through the decision process.

The workforce participation rate of Hispanic bank examiners remained stable in fiscal year 2016 at 6.5 percent, below the OCLF rate of 6.8 percent. Hispanic participation in the other major occupational groups increased from fiscal year 2015—economists, from 4.0 percent to 4.3 percent, but below their OCLF rate of 5.1 percent; and attorneys, from 7.5 percent to 7.9 percent, above their OCLF rate of 4.3 percent.

In fiscal year 2016, Hispanics in all major occupational groups were hired at rates exceeding their OCLF rates—bank examiners (8.7 percent versus 6.8 percent), economists (7.7 percent versus 5.1 percent), and attorneys (25.0 percent versus 4.3 percent). The OCC had no separations of Hispanic attorneys or economists. Hispanic male and female bank examiners separated at a higher rate than their participation rate in the workforce—males (5.7 percent versus 3.8 percent) and females (2.9 percent versus 2.7 percent); Hispanic male examiner separations represent 54.5 percent of all Hispanic separations. Also, the number of Hispanic examiner separations, as a percentage of Hispanic examiners (turnover rate), increased to 10.5 percent from 7.2 percent in fiscal year 2015.

The low workforce participation rate of Hispanics is largely influenced by low participation in the OCC's non-major occupational groups (7.7 percent versus 10.0 percent NCLF rate). Although significantly below parity, Hispanic participation in the non-major occupational groups increased slightly since fiscal year 2015 (7.5 percent). Ten Hispanics (9.2 percent) were hired in the non-major occupational groups in fiscal year 2016, slightly below the 10.0 percent NCLF rate but an increase from the fiscal year 2015 hiring rate of 4.2 percent. Hispanics in the non-major occupational groups separated at 5.9 percent, below the workforce participation rate of 7.7 percent in fiscal year 2016 and the fiscal year 2015 separation rate of 7.6 percent. See table 7, "OCC Hispanic Profile by Occupational Positions, Five-Year Trend."

The OCC continued to benefit from its Hispanic employee network group (ENG), the Hispanic Organization for Leadership and Advancement (HOLA). In fiscal year 2016, HOLA, in partnership with other ENGs, hosted three national leadership teleconferences that provided briefings on the OCC's "Leadership" initiative, as part of the groups' career advancement and retention programs. In fiscal year 2016, HOLA established a Human Capital Committee to assist

with the agency's efforts to recruit, retain, and advance a diverse workforce. To support retention, HOLA launched the Discipline Champions Cadre to encourage networking, mentoring, and collaboration among its members. In addition, HOLA published its first newsletter to facilitate the exchange of career information and advice among its members.

In fiscal year 2017, the OCC will continue to focus on increasing the participation rate of Hispanics, with special emphasis on external hiring opportunities in job series with underrepresentation of Hispanics. The OCC will also continue to partner with HOLA to foster retention and developmental programs.

Female Bank Examiners

The OCC's population of female bank examiners decreased slightly in fiscal year 2016 to 38.7 percent from 39.0 percent in fiscal year 2015 and remains below the OCLF rate of 45.3 percent. The 34.4 percent hiring rate of female bank examiners was below the OCLF rate (45.3 percent) and the fiscal year 2015 hiring rate (38.1 percent). See table 8, "OCC Female Bank Examiner Profile by EEO Groups, Five-Year Trend." In addition, of the 11 bank examiners who were rehired in fiscal year 2016, five were females. The OCC's applicant analysis of the 2016 recruitment campaigns showed females, on average, applied for 34.1 percent and were hired for 33.9 percent of entry-level bank examiner positions, at rates below the OCLF rate (45.3 percent).

During fiscal year 2016, female bank examiners separated at a rate (37.3 percent of all examiner separations) below their workforce participation rate (38.7 percent) but above their hiring rate (34.4 percent) and their rate of separation in fiscal year 2015 (34.0 percent). Resignations and transfers to other federal agencies accounted for 47.4 percent of separating female bank examiners in fiscal year 2016, and retirements accounted for 48.7 percent. In fiscal year 2016, the retirement eligibility pool (currently eligible and expected to obtain eligibility within five years) for female bank examiners was 29.7 percent, which was the lowest retirement eligibility rate since fiscal year 2011, compared with an average of 31.0 percent over the past five years. Because of the historical growth in the retirement eligibility pool, retention of female bank examiners continues to be a challenge. Separating female bank examiners most frequently cited job stress, travel requirements, and workload as the reasons for separation in the fiscal year 2016 exit surveys. Two factors cited often in fiscal year 2015 showed improvement during this fiscal year—office morale and relationship with supervisors (recognition of efforts, contributions, and achievements).

Efforts to identify and address barriers to the hiring and retaining of female bank examiners include continued partnership among the OCC's Office of Minority and Women Inclusion (OMWI), Office of Human Capital (HC), and bank supervision management on targeted recruitment, retention, and succession planning. Efforts include enhancing current recruitment processes and sources for entry-level and experienced female bank examiners; advertising with targeted professional organizations for specialty skills; and partnering with the Women's Network (TWN) to sponsor mentoring and networking activities to support female bank examiner retention. In fiscal year 2016, TWN held mentoring circles on relevant topics like

“Career Exploration at the OCC,” “Work-Life Balance,” “Uniform Commission Examination (UCE) Preparation,” and “Leadership at the OCC.”

In addition, the OCC’s annual Career Forum provided three-year precommissioned examiners with information about examiner career opportunities and the UCE and cross-credential preparatory processes. Of the 59 OCC precommissioned examiners who successfully passed the UCE in fiscal year 2016, 40.7 percent (24) were females, down from 46.0 percent in fiscal year 2015. Of the 54 OCC examiners who successfully passed the cross-credential test in fiscal year 2016, 44.4 percent were female, up from 34.2 percent in fiscal year 2015. In fiscal year 2016, the Midsize and Community Bank Supervision business unit sponsored its second experienced-hire career forum for bank examiners hired between 2010 and 2014. The focus of the forum was to provide experienced examiners with information about career assignment opportunities and to discuss current hot topics in the agency and high-risk bank supervision issues.

Individuals With Disabilities

In fiscal year 2016, the participation of individuals with disabilities increased to 6.2 percent from 5.6 percent in fiscal year 2015 but remained below the Treasury Department’s goal of 10.0 percent. The OCC hired 44 individuals with disabilities in fiscal year 2016, representing 11.5 percent of the hires, above the Treasury Department goal (10.0 percent), their workforce participation rate (6.2 percent), and the fiscal year 2015 hiring rate (9.0 percent).

The OCC’s applicant analysis showed individuals with disabilities were 1.1 percent of applicants and 7.5 percent of entry-level bank examiner hires as part of the 2016 recruitment campaigns; both rates were below the Treasury Department goal of 10.0 percent.

The separation rate (7.3 percent) of individuals with disabilities was higher than their participation rate in the workforce (6.2 percent) in fiscal year 2016 and above the fiscal year 2015 separation rate of 5.6 percent.

The participation rate of individuals with targeted disabilities increased in fiscal year 2016 to 0.5 percent, from 0.4 percent in fiscal year 2015. The OCC hired six individuals with targeted disabilities in fiscal year 2016, representing 1.6 percent of the hires, above the workforce participation rate (0.5 percent) and the fiscal year 2015 hiring rate (0.7 percent) but below the Treasury Department goal of 2.0 percent. Of the OCC’s staff with targeted disabilities, 40.0 percent were bank examiners. See table 9, “OCC Individuals With Targeted Disabilities, Five-Year Trend.”

The OCC continued to explore ways to recruit individuals with targeted disabilities. Agency efforts included participation in career fairs; outreach to potential candidates through the Internet and organizations that support individuals with disabilities for permanent employment, summer hiring programs, and internships; educating managers and supervisors about special appointing authorities; and sponsoring disability awareness month activities for all employees.

In addition, the OCC enhanced existing training design, development, and delivery methods to ensure that all educational deliverables and live instructional events are section 508-compliant

and accessible for individuals with disabilities. Additionally, the agency instituted an instructor coaching process to equip OCC educators with appropriate knowledge and skills for facilitating training and development sessions for diverse groups of learners, including those with disabilities.

Females and Minorities in Supervisor Roles and SLPs

In fiscal year 2016, the OCC continued to experience low participation rates of females and minorities in supervisor positions and SLPs as compared with their workforce participation rates. Females participated at 45.2 percent of the OCC workforce and held 37.7 percent of supervisor positions and 29.3 percent of SLPs. Minorities participated at 34.2 percent of the workforce, and held 23.9 percent of supervisor positions and 17.3 percent of SLPs. Minority participation increased in fiscal year 2016 in both supervisor positions and SLPs by 0.2 and 3.0 percentage points, respectively. Participation rates of females increased in SLPs by 2.5 percentage points and decreased in supervisor positions by 0.6 percentage points. See table 10, “OCC Participation in Supervisor Positions by EEO Groups, FY 2015 and FY 2016,” and table 11, “OCC Participation in SLPs by EEO Groups, FY 2015 and FY 2016.”

Supported by the Comptroller and the Executive Committee (EC), in fiscal year 2015, the OCC’s OMWI established an interdisciplinary working group of employees to perform a barrier analysis to improve diversity and promote inclusion in SLPs and their pipeline positions. The Diversity and Development Working Group analyzed data, conducted root cause analyses, reviewed agency policies and practices, researched best practices, identified potential solutions, and developed an implementation framework to support the increase of females and minorities in SLPs. In fiscal year 2016, findings and recommendations of the working group were presented and approved by senior management, and implementation of an action plan began. Execution of the action plan will continue in fiscal year 2017. Some of the plan action items include revising the alternative work schedule *Policies and Procedures Manual* issuance to remove restrictions on pay bands NB-VIII and NB-IX, establishing mandatory training for managers, and including diversity and inclusion performance standards in the revised performance management system.

The efforts of the working group also addressed the Treasury Department Office of Inspector General’s (OIG) and the U.S. Equal Employment Opportunity Commission’s (EEOC) recommendations for the OCC to continue its efforts to increase the participation of minorities and women in supervisor positions and SLPs. This recommendation was part of the OIG’s final report from its fiscal year 2014 review of the OCC’s personnel practices and other efforts to increase agency diversity, create a workplace free of systemic discrimination, and provide equal opportunity for minorities and women to obtain SLPs. The recommendation was also part of the EEOC’s final report issued in November 2015 based on a status review of the OCC’s EEO program.

The OCC continued efforts to implement the goals and objectives of the “Leadership” initiative, designed to create a systematic and sustainable process for succession planning that ensures continuity, development, and diversity of leadership at all levels of the organization. The Leadership Development Advisory Board (LDAB) continued to provide leadership, guidance, and governance for leadership development. The OMWI Executive Director is a member of the

LDAB. In fiscal year 2016, the OCC Leadership Institute was established as an enterprise-wide approach to the systematic development of leaders at all levels through a competency-based curriculum and developmental assignments. The core components of the institute incorporated many of the agency's career development initiatives that were already under way. Also, in fiscal year 2018 the agency will develop a competitive Executive Development program that focuses on key executive competencies. New leadership courses were piloted and launched for managers, supervisors, and employees, to include "Career Development Conversations," "Career Power," "Coaching for Results," "Leadership Foundations," "Leading and Engaging," and "Leveraging Diversity and Creating an Inclusive Work Environment." In the summer of 2017, the agency will pilot a Women in Leadership program. The OCC also continued to administer a robust Executive Coaching Program, sponsor the Leadership Development Speakers' Bureau, hold informational manager forums, and publish a quarterly management newsletter, *Compass*, to educate and inform managers of leadership development opportunities.

The OCC also realigned its Organizational Development and Leadership Development functions into one new department—Leadership, Executive, and Organizational Development (LE&OD), under the leadership of a Deputy Comptroller. Aligning these units into one organization combines the strengths of both groups while expanding executive development and resources. This change emphasizes the importance of leadership, organizational development, and change management at the agency. LE&OD will serve as the key advisor to the Comptroller and senior leadership on the design, development, and implementation of leadership and career development programs, organizational development, and succession management strategies, including enterprise workforce planning.

Alternative Dispute Resolution

The Treasury Department's goal is to process at least 45.0 percent of completed EEO pre-complaints³ using alternative dispute resolution (ADR) in lieu of traditional EEO counseling. The OCC continued to promote its ADR program as an alternative means of resolution and made its ADR Policy Statement available to all staff on the OCC's intranet site; held mandatory training for new managers, training team leaders and assistants, and all new hires; provided daily tips regarding ADR on the Headquarters Electronic Bulletin Boards and through announcements in "What's New at the OCC" on the intranet site; and featured ADR as a module in the No FEAR Act training.

In fiscal year 2016, the OCC's ADR participation rate increased to 30.8 percent of EEO pre-complaints from 18.2 percent in fiscal year 2015. Of the completed cases in fiscal year 2016, 26.9 percent were ineligible for ADR based on the OCC's ADR policy. The OCC does not offer ADR for pre-complaints involving nonselection of an external applicant, termination, criminal activity, fraud, waste, or abuse. In fiscal year 2017, the agency will highlight ADR as a resource for employees during the Treasury Department's Dispute Prevention Week, continue to evaluate how to remove potential barriers to ADR, and analyze cases in which ADR was not used.

³ A pre-complaint, also referred to as an informal complaint, is the first stage of an EEO complaint. Counseling occurs during the pre-complaint stage, while the complaint remains internal to the OCC. It precedes a formal complaint, which is external to the OCC.

Model Equal Employment Opportunity and Diversity Program Elements

Commitment and Integration of EEO

On September 14, 2016, 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 issues with the Human Capital Subcommittee of the EC.

Senior managers receive annual "State of the Workforce" reports and Business Unit Diversity Reviews, which cover retirement patterns; recruitment, hiring, and retention initiatives and programs; training and career development; and leadership and management development. Moreover, the MD-715 report is reviewed annually with the Comptroller after input from EC members.

The OCC has 12 full-time EEO and diversity staff members. The agency has six ENGs: HOLA, TWN, the Network of Asian Pacific Americans, the Coalition of African American Regulatory Employees, PRIDE (the gay, lesbian, transgender, and bisexual employees network group), and Generational Crossroads. In addition, concerted efforts are under way to establish a veterans-related ENG. The ENGs serve as a voice in communicating workplace concerns and providing input to management regarding diversity and inclusion programs and activities within the OCC, as well as a way to promote awareness and participation of OCC programs that support diversity.

The OCC also has allocated sufficient resources to train all employees on the EEO/Diversity and Inclusion Program. Some of the agency's efforts in fiscal year 2016 included providing EEO, ADR, and diversity and inclusion training during new hire orientations, new manager orientations, and training sessions for team leaders and assistants.

Collectively, the sessions provided training on an array of issues: managing and participating in a diverse work environment; discrimination, including workplace harassment; generational diversity; ADR; and conflict resolution tools, including "Crucial Conversations" and Diversity Dialogue sessions. The OCC conducted 30 Diversity Dialogues with more than 500 employees and 30 supervisors/managers in different offices in Headquarters, the district offices, and field locations.

In fiscal year 2016, the OCC piloted a leadership course, "Leveraging Diversity and Creating an Inclusive Work Environment," specifically tailored for managers and rating officials to explore the impact of unconscious bias and leveraging diversity and inclusion in hiring, promotions, performance management, and succession management. The pilot course received high favorability evaluations and will be offered in fiscal year 2017.

The OCC offers more than 70 career development training courses for employees to acquire the competencies, skills, and knowledge for their continual learning and career development. In fiscal year 2016, 1,506 employees participated in these courses. Females and all EEO demographic groups, except Hispanics, participated in the training courses at rates below their

workforce participation rates, but near or above each group's training participation rate in fiscal year 2015. See table 12, "OCC Career Development Training, Three-Year Trend." In addition to skills training, 1,364 employees received diversity and EEO training, not including the biannual No FEAR Act Training in fiscal year 2016. See table 13, "OCC Diversity and EEO Training, Three-Year Trend." The OCC also offered 13 leadership courses to prepare employees across the agency for formal leadership or to enhance their current leadership capabilities. In fiscal year 2016, 971 employees participated in these courses.

OCC managers and supervisors participated in four agency-sponsored Manager Forums (877 attendees/occurrences) through audio/video/phone conferences on various topics of interest; over 1,500 employees viewed Leadership Channel Videos through the HC training and development organization in fiscal year 2016.

The OCC continued to implement the goals and objectives of its "Leadership" initiative to ensure that training and development opportunities are in place to support a culture of leadership. In addition, the OCC continued to improve the alignment of its retention, recruitment, and training programs with agency needs by developing a strategic focus on enhancing the efficiency and effectiveness of those programs. This focus includes the OCC's strategic priority of matching its workforce with its needs by developing an enterprise-wide workforce plan that aligns the OCC's human capital efforts with its vision for the future. OCC leadership is committed to the employee engagement process, which is one of several initiatives the Comptroller implemented across the agency to enhance effectiveness and ensure that the OCC continues to be a great place to work.

In FY 2016, OCC employees participated in a supplemental engagement survey for a third time and the results show the OCC is a strong and engaged organization, with core strengths that continue to grow. The overall results showed that employees were satisfied with their jobs and immediate managers and highly focused on external stakeholders. The OCC's work environment is healthier, with increased levels of respect and professionalism, and employees are becoming more comfortable expressing their opinions. Employees also reported more optimism about training and career development opportunities and expressed more satisfaction with team collaboration and work/life balance.

Accountability

Managers, supervisors, and EEO officials are accountable for the effective implementation of the agency's EEO and Diversity and Inclusion Program and plans. The OMWI Executive Director and HC officials meet regularly to share information and address areas of interest or concern relative to the agency's personnel programs, policies, and procedures, and to ensure that the OCC meets its EEO requirements. Such collaboration allows for a more robust exchange of ideas on matters with overarching agency implications. OMWI and HC have a strong partnership and work together to support and address the agency's human capital needs and challenges.

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. The OCC is undertaking a comprehensive review and redesign of its performance management system, including the performance appraisal

process. A job analysis to develop new, validated performance appraisal criteria is under way. Recommendations for new performance management and appraisal processes are expected in spring 2017.

In fiscal year 2016, the OCC's EEO, Legal, and reasonable accommodation (RA) coordinator's offices began partnering to review the RA program to determine compliance with procedures, identify any deficiencies, and suggest ways to improve the program. Possible results could be additional manager/employee training and revised tracking methods. The review will continue in fiscal year 2017, and an action plan will be developed, if necessary.

All new managers and supervisors are required to complete a four-and-a-half-day Manager Orientation, which includes a review of their responsibilities in creating and managing a diverse workforce, upholding the principles of EEO and ADR, and responding to requests for RA. Written EEO materials and related policies and procedures are posted on the OCC's intranet and in prominent locations at OCC Headquarters, district offices, and field offices. All new employees take the mandatory No FEAR Act training within 60 days of their hire date, and all employees are required to complete the training every two years.

The performance plans of all OCC managers include an element on EEO that focuses on the managers' ability to establish and maintain a nondiscriminatory and regulatory-compliant working environment, employ fair and inclusive recruitment and retention strategies, and support 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 EEO element. In fiscal year 2016, all OCC supervisors and managers were required to complete training on Prohibited Personnel Practices and Whistleblower Protection Laws.

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 147 respondents in fiscal year 2016, 91.2 percent were positive about their OCC work experience, 81.0 percent would work for the OCC again, and 91.8 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 workforce profiles as a whole.

In 2016, 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, teamwork, and training and development. More than 2,000 OCC employees completed the survey, a 61.4 percent response rate. OCC employees' ratings were more favorable in all major categories than those of respondents in the federal government as a whole and in all but one category than employees of the Treasury Department. OCC employees responded most favorably to questions in the categories for work/life, supervisors, and work experience. Although the OCC's average diversity and inclusion index rating declined 8.0 percentage points to 62.0 percent and a "Fair" overall ranking, the agency's index rating remained higher than that of the Treasury Department (60.0 percent) and the federal government overall (58.0 percent).

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 a fair and efficient process for resolving disputes in the workplace and has a system for evaluating the effectiveness of its complaint-processing program. In fiscal year 2016, the OCC processed all of its informal complaints in a timely manner. OCC analysis showed that the most common bases for EEO complaints were reprisal, disability, and race discrimination. The most common issues were hostile work environment, disability RA, and performance.

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 EEO Manager's performance standards include responsibility for monitoring the agency's compliance with settlement agreements, final orders, and court orders. The OCC submitted all quarterly ADR reports and its annual "Statistical Report of Discrimination Complaints" in a timely manner. There were no findings of discrimination in fiscal year 2016. 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" for fiscal year 2016 accomplishments and fiscal year 2017 plans that was submitted to the Equal Employment Opportunity Commission through coordination with the Treasury Department, under the Equal Employment Opportunity Commission'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, Five-Year Trend (by Percentage)

	Male	Female	Minority	Asian	Black	Hispanic	Small ERI groups	White
FY 2012	54.1	45.9 ^a	30.5	6.2	16.0	6.3 ^a	2.1 ^a	69.5 ^a
2000 NCLF	53.2	46.8	27.3	3.6	10.5	10.7	2.4	72.7
FY 2013	54.4	45.6 ^a	32.1	7.4	16.7	6.6 ^a	1.4 ^a	67.9 ^a
FY 2014	54.9	45.1 ^a	32.4	7.7	16.8	6.6 ^a	1.3 ^a	67.6 ^a
FY 2015	54.9	45.1 ^a	33.1	7.8	17.2	6.8 ^a	1.4 ^a	66.9 ^a
FY 2016	54.8	45.2 ^a	34.2	8.4	17.6	6.9 ^a	1.3 ^a	65.8 ^a
2010 NCLF	51.9	48.1	27.7	3.9	12.0	10.0	1.6	72.3
Percentage point change from FY 2012 to FY 2016	+0.7	-0.7	+3.7	+2.2	+1.6	+0.6	-0.8	-3.7

Source: MD-715 workforce data table as of September 30, 2016.

^a EEO groups participating at rates below the 2010 or 2000 NCLF rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Note: The 2010 NCLF was used as a comparator starting with the FY 2013 workforce participation rates, while the 2000 NCLF was used as a comparator for FY 2012.

Table 2: OCC Workforce Profile as of September 30, 2016, Compared With RCLF Rates (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
OCC workforce	3,958	54.8	45.2 ^a	8.4	17.6	6.9 ^a	1.3	65.8 ^a
2016 RCLF		42.1	57.9	4.7	9.2	7.3	1.3	77.4

Source: MD-715 workforce data table as of September 30, 2016.

^a EEO groups participating at rates below the 2016 RCLF rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Table 3: OCC Workforce Profile as of September 30, 2016 (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
OCC workforce	3,958	54.8	45.2 ^a	8.4	17.6	6.9 ^a	1.3 ^a	65.8 ^a
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3
Bank examiner	2,616	61.3	38.7 ^a	6.4 ^a	12.9	6.5 ^a	1.2	73.0
2010 bank examiner OCLF		54.7	45.3	7.7	12.3	6.8	0.9	72.4
Attorney	177	52.0 ^a	48.0	6.8	5.7	7.9	0.6 ^a	79.1 ^a
2010 attorney OCLF		66.7	33.3	3.6	4.7	4.3	0.9	86.4
Economist	92	66.3 ^a	33.7	33.7	3.3 ^a	4.3 ^a	0.0 ^a	58.7 ^a
2010 economist OCLF		67.1	32.9	7.6	5.5	5.1	0.9	81.0
All other series	1,073	38.5 ^a	61.5	11.4	32.4	7.7 ^a	1.9	46.6 ^a
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3

Source: MD-715 workforce data table as of September 30, 2016.

^a EEO groups participating at rates below the 2010 NCLF or OCLF rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Table 4: OCC Hires, Five-Year Trend (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2012	359	59.1	40.9 ^a	7.7	16.2	8.1 ^a	2.8	65.7 ^a
2000 NCLF		53.2	46.8	3.6	10.5	10.7	2.4	72.7
FY 2013	421	61.3	38.7 ^a	10.0	19.0	8.6 ^a	1.4 ^a	61.0 ^a
FY 2014	221	64.7	35.3 ^a	14.5	12.7	7.2 ^a	1.4 ^a	64.3 ^a
FY 2015	268	58.2	41.8 ^a	7.4	19.7	8.6 ^a	1.2 ^a	63.0 ^a
FY 2016	382	57.6	42.4 ^a	9.7	17.5	9.2 ^a	1.3 ^a	62.3 ^a
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3

Source: MD-715 workforce data table as of September 30, 2016.

^a EEO groups hired at rates below the 2000 or 2010 NCLF rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Note: The 2010 NCLF was used as a comparator starting with the FY 2013 workforce participation rates, while the 2000 NCLF was used as a comparator for FY 2012.

Table 5: OCC Separations, Five-Year Trend (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2012	315	59.7 ^a	40.3	6.0	17.8 ^a	3.8	0.6	71.7 ^a
FY 2013	265	61.1 ^a	38.9	6.0	16.2	5.3	1.5	71.0 ^a
FY 2014	318	55.7 ^a	44.3	8.5 ^a	11.3	7.5 ^a	2.2 ^a	70.4 ^a
FY 2015	303	56.4 ^a	43.6	5.9	14.5	6.5	2.0 ^a	71.0 ^a
FY 2016	288	59.0 ^a	41.0	4.9	11.8	7.6 ^a	0.7	75.0 ^a
Average OCC workforce participation rate		54.6	45.4	7.5	16.9	6.6	1.5	67.5

Source: MD-715 workforce data table as of September 30, 2016.

^a EEO groups separated at rates above their average workforce participation rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Table 6: OCC Promotions, Five-Year Trend (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2012	328	56.7	43.3 ^a	7.3	10.7 ^a	5.5 ^a	0.9 ^a	75.6
FY 2013	408	52.2 ^a	47.8	4.7 ^a	11.5 ^a	9.1	1.7	73.0
FY 2014	426	57.0	43.0 ^a	7.7	16.2 ^a	8.2	2.3	65.5 ^a
FY 2015	331	55.9	44.1 ^a	8.2	18.1	7.5	0.6 ^a	65.6 ^a
FY 2016	404	55.5	44.6 ^a	9.2	15.6 ^a	7.9	1.5	65.8 ^a
Average OCC workforce participation rate		54.6	45.4	7.5	16.9	6.6	1.5	67.5

Source: OCC HR Data Mart as of FY 2016.

^a EEO groups promoted at rates below their average workforce participation rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Table 7: OCC Hispanic Profile by Occupational Positions, Five-Year Trend (by Percentage)

			FY 2012		FY 2013	FY 2014	FY 2015	FY 2016
Bank examiner	Hires	3.8 2000 OCLF	5.6	6.8 2010 OCLF	7.8	7.4	10.2	8.7
	Separations		4.4		4.8	9.1 ^b	6.2	8.6 ^b
	OCC workforce participation rate		6.0		6.3 ^a	6.2 ^a	6.5 ^a	6.5 ^a
Attorney	Hires	3.5 2000 OCLF	14.3	4.3 2010 OCLF	0.0 ^a	20.0	0.0 ^a	25.0
	Separations		0.0		0.0	11.1 ^b	7.1	0.0
	OCC workforce participation rate		7.1		7.3	7.6	7.5	7.9
Economist	Hires	5.1 2000 OCLF	0.0 ^a	5.1 2010 OCLF	20.0	14.3	0.0 ^a	7.7
	Separations		0.0		20.0 ^b	16.7 ^b	0.0	0.0
	OCC workforce participation rate		4.5 ^a		4.4 ^a	4.2 ^a	4.0 ^a	4.3 ^a
All other series	Hires	10.7 2000 NCLF	14.6	10.0 2010 NCLF	10.5	5.5 ^a	4.2 ^a	9.2 ^a
	Separations		3.1		6.4	1.4	7.6 ^b	5.9
	OCC workforce participation rate		7.0 ^a		7.4 ^a	7.7 ^a	7.5 ^a	7.7 ^a

Source: MD-715 workforce data table as of September 30, 2016.

^a Hispanic workforce participation and hiring rates below the relative 2000 or 2010 NCLF or OCLF rates.

^b Hispanic separation rates above their workforce participation rate.

Note: The 2010 NCLF was used as a comparator starting with the FY 2013 workforce participation rates, while the 2000 NCLF was used as a comparator for FY 2012.

Table 8: OCC Female Bank Examiner Profile by EEO Groups, Five-Year Trend (by Percentage)

			FY 2012		FY 2013	FY 2014	FY 2015	FY 2016
Female	Hires	42.4 2000 OCLF	36.0 ^a	45.3 2010 OCLF	35.1 ^a	32.4 ^a	38.1 ^a	34.4 ^a
	Separations		31.9		35.1	40.5 ^b	34.0	37.3
	OCC workforce participation rate		38.8 ^a		39.2 ^a	38.5 ^a	39.0 ^a	38.7 ^a
Asian female	Hires	2.8 2000 OCLF	2.4 ^a	4.0 2010 OCLF	3.2 ^a	0.0 ^a	2.5 ^a	4.7
	Separations		2.9 ^b		0.5	3.5 ^b	3.1 ^b	2.4
	OCC workforce participation rate		2.6 ^a		2.9 ^a	2.7 ^a	2.6 ^a	2.8 ^a
Black female	Hires	6.9 2000 OCLF	6.8 ^a	8.7 2010 OCLF	7.8 ^a	9.6	7.1 ^a	6.7 ^a
	Separations		5.9		5.8	5.2	7.2 ^b	5.7
	OCC workforce participation rate		6.0 ^a		6.3 ^a	6.6 ^a	6.7 ^a	6.8 ^a
Hispanic female	Hires	1.6 2000 OCLF	2.4	3.7 2010 OCLF	2.1 ^a	2.2 ^a	4.6	3.2 ^a
	Separations		2.0		2.7 ^b	3.0 ^b	1.0	2.9 ^b
	OCC workforce participation rate		2.5		2.5 ^a	2.4 ^a	2.7 ^a	2.7 ^a
Native American female	Hires	0.2 2000 OCLF	0.0 ^a	0.3 2010 OCLF	0.0 ^a	0.0 ^a	0.5	0.0 ^a
	Separations		0.0		0.5	0.4	0.0	0.5 ^b
	OCC workforce participation rate		0.4		0.5	0.4	0.5	0.4
White female	Hires	30.3 2000 OCLF	23.2 ^a	28.3 2010 OCLF	21.6 ^a	20.6 ^a	23.3 ^a	19.8 ^a
	Separations		21.1		25.0	28.0 ^b	22.2	25.8
	OCC workforce participation rate		26.9 ^a		26.7 ^a	26.2 ^a	26.3 ^a	25.8 ^a

Source: MD-715 workforce data table as of September 30, 2016.

^a Female bank examiner workforce participation and hiring rates below the 2000 or 2010 bank examiner OCLF rates.

^b Female bank examiner separation rates above their workforce participation rates.

Note: The 2010 NCLF was used as a comparator starting with the FY 2013 workforce participation rates, while the 2000 NCLF was used as a comparator for FY 2012.

Table 9: OCC Individuals With Targeted Disabilities, Five-Year Trend (by Percentage)

		FY 2012	FY 2013	FY 2014	FY 2015	FY 2016
Individuals with targeted disabilities (Treasury goal: 2%)	Hires	0.0 ^a	0.2 ^a	0.9 ^a	0.7 ^a	1.6 ^a
	Separations	0.6 ^b	0.4 ^b	0.0	0.0	0.4
	OCC workforce participation rate	0.3 ^a	0.3 ^a	0.3 ^a	0.4 ^a	0.5 ^a

Source: MD-715 workforce data table as of September 30, 2016.

^a Workforce participation and hiring rates below Treasury Department's goal.

^b Separation rates above the workforce participation rate.

Table 10: OCC Participation in Supervisor Positions by EEO Groups, FY 2015 and FY 2016 (by Percentage)

	FY 2015		FY 2016		Supervisor participation percentage point change from FY 2015 to FY 2016
	OCC workforce participation	OCC supervisor participation	OCC workforce participation	OCC supervisor participation	
Male	54.9	61.7	54.8	62.3	+0.6
Female	45.1	38.3 ^a	45.2	37.7 ^a	-0.6
Minority	33.1	23.7 ^a	34.2	23.9 ^a	+0.2
Minority male	14.9	12.3 ^a	15.6	12.8 ^a	+0.5
Minority female	18.2	11.4 ^a	18.6	11.1 ^a	-0.3
Asian	7.8	6.4 ^a	8.4	7.4 ^a	+1.0
Black	17.2	10.6 ^a	17.6	10.8 ^a	+0.2
Hispanic	6.8	6.1 ^a	6.9	5.2 ^a	-0.9
Small ERI groups	1.3	0.6 ^a	1.3	0.5 ^a	-0.1
White	66.9	76.2	65.8	76.1	-0.1
White male	40.0	49.4	39.2	49.5	+0.1
White female	26.9	26.8 ^a	26.6	26.6	-0.2
Total number	3,819	358	3,958	406	

Source: OCC HR Data Mart as of October 1, 2016.

^a EEO groups participating at rates below their workforce participation rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Table 11: OCC Participation in SLPs by EEO Groups, FY 2015 and FY 2016 (by Percentage)

	FY 2015		FY 2016		SLP participation percentage point change from FY 2015 to FY 2016
	OCC workforce participation	NB VIII-IX (equiv. SLP)	OCC workforce participation	NB VIII-IX (equiv. SLP)	
Male	54.9	73.2	54.8	70.7	-2.5
Female	45.1	26.8 ^a	45.2	29.3 ^a	+2.5
Minority	33.1	14.3 ^a	34.2	17.3 ^a	+3.0
Minority male	14.9	10.7 ^a	15.6	12.1 ^a	+1.4
Minority female	18.2	3.6 ^a	18.6	5.2 ^a	+1.6
Asian	7.8	1.8 ^a	8.4	3.5 ^a	+1.7
Black	17.2	10.7 ^a	17.6	12.1 ^a	+1.4
Hispanic	6.8	1.8 ^a	6.9	1.7 ^a	-0.1
Small ERI groups	1.3	0.0 ^a	1.3	0.0 ^a	-
White	66.9	85.7	65.8	82.7	-3.0
White male	40.0	62.5	39.2	58.6	-3.9
White female	26.9	23.2 ^a	26.6	24.1 ^a	+0.9
Total number	3,819	56	3,958	58	

Source: MD-715 workforce data table as of September 30, 2016.

^a EEO groups participating at rates below their workforce participation rates.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Table 12: OCC Career Development Training, Three-Year Trend (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2014	1,625	58.5	41.5	7.3	13.7	3.1	6.9	69.0
FY 2015	1,440	58.4	41.6	6.9	14.9	8.6	1.3	68.3
FY 2016	1,506	59.6	40.4	7.2	14.9	8.6	1.0	68.3
Average OCC workforce participation rate		54.6	45.4	7.5	16.9	6.6	1.5	67.5

Source: OCC TLMS Data Mart as of September 30, 2016.

Table 13: OCC Diversity and EEO Training, Three-Year Trend (by Percentage)

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2014	413	43.8	56.2	6.5	15.0	8.0	1.2	66.8
FY 2015	1,155	53.9	46.1	6.8	16.4	6.8	1.0	69.0
FY 2016	1,364	52.6	47.4	6.5	16.7	7.8	0.9	68.2
Average OCC workforce participation rate		54.6	45.4	7.5	16.9	6.6	1.5	67.5

Source: OCC TLMS Data Mart as of September 30, 2016.

Note: Participation of Diversity Dialogues not included in the diversity and EEO training.