

EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

MD-715
Parts A Through E

Part A - Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
National Credit Union Administration	N/A	1775 Duke Street	Alexandria	VA	22314-3428	CU00	

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	1130	13	1143

Part C.1 - Head of Agency and Head of Agency Designee

Agency Leadership	Name	Title
Head of Agency	The Honorable Rodney E. Hood	Chairman
Head of Agency Designee	Rendell Jones	Deputy Executive Director

Part C.2 - Agency Official(s) Responsible for Oversight of EEO Program(s)

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Monica Davy	OMWI Director	0301	SSP/2	703-518-1651	MDavy@ncua.gov
Affirmative Employment Program Manager	Monica Davy	OMWI Director	0301	SSP/2	703-518-1651	MDavy@ncua.gov

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EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Complaint Processing Program Manager	Stephanie Smith	Equal Employment Opportunity Specialist	0260	CU-14	703-518-1181	SSmith@ncua.gov
Diversity & Inclusion Officer	Scot Evans	Diversity and Inclusion Outreach Program Manager	0301	CU-14	703-518-1624	SEvans@ncua.gov
Hispanic Program Manager (SEPM)	Gladymar Rivera-Virella	Equal Employment Opportunity Specialist	0260	CU-11	703-518-6328	GVirella@ncua.gov
Women's Program Manager (SEPM)	Gladymar Rivera-Virella	Equal Employment Opportunity Specialist	0260	CU-11	703-518-6328	GVirella@ncua.gov
Disability Program Manager (SEPM)	Stephanie Smith	Equal Employment Opportunity Specialist	0260	CU-14	703-518-1181	SSmith@ncua.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Lisa Bazemore	Lead Human Resources Specialist	0201	CU-14	703-518-6578	MBazemore@ncua.gov
Reasonable Accommodation Program Manager	Stephanie Smith	Equal Employment Opportunity Specialist	0260	CU-14	703-518-1181	SSmith@ncua.gov
Anti-Harassment Program Manager	Stephanie Smith	Equal Employment Opportunity Specialist	0260	CU-14	703-518-1181	SSmith@ncua.gov

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EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
ADR Program Manager	Stephanie Smith	Equal Employment Opportunity Specialist	0260	CU – 14	703-518-1181	SSmith@ncua.gov
Compliance Manager	Monica Davy	OMWI Director	0301	SSP	703-518-1651	MDavy@ncua.gov
Principal MD-715 Preparer	Dr. Bonita Soley	Management Analyst (Diversity)	0343	CU – 13	703-548-2538	BSoley@ncua.gov
Other EEO Staff	Terri Finley-Harrigan	Administrative Assistant	0303	CU-9	703-518-6614	TFinleyHarrigan@ncua.gov

Part D.1 – List of Subordinate Components Covered in this Report

Please identify the subordinate components within the agency (e.g., bureaus, regions, etc.).

If the agency does not have any subordinate components, please check the box.

Subordinate Component	City	State	Country (Optional)	Agency Code (xxxx)	FIPS Codes (xxxxx)

Part D.2 – Mandatory and Optional Documents for this Report

In the table below, the agency must submit these documents with its MD-715 report.

Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Organizational Chart	Yes	
EEO Policy Statement	Yes	

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Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	No	NOTE: Posted February 26, 2021 – status will be updated in 2021 MD-715.
Alternative Dispute Resolution Procedures	Yes	

In the table below, the agency may decide whether to submit these documents with its MD-715 report.

Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Federal Equal Opportunity Recruitment Program (FEORP) Report	Yes	
Disabled Veterans Affirmative Action Program (DVAAP) Report	Yes	
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	No	NCUA has a strong outreach program for individuals with disabilities and consistently exceeds the EEOC goals.
Diversity and Inclusion Plan under Executive Order 13583	Yes	
Diversity Policy Statement	Yes	
Human Capital Strategic Plan	Yes	The 2018-19 HC plan was uploaded – The 2021 HC Operating Plan has been uploaded - The new HC Strategic

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Did the agency submit the following optional documents?	Please respond Yes or No	Comments
		Plan is being drafted and will not be available until late 2021.
EEO Strategic Plan	Yes	Incorporated in the NCUA Diversity and Inclusion Plan.
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	Yes	NOTE: FEVS20 did not include the New IQ, a proxy was created which was closely aligned to the New IQ scores for trending in 2020.

Part E – Executive Summary

All agencies must complete Part E.1; however, only agencies with 199 or fewer employees in permanent FT/PT appointments are required to complete Part E.2 to E.5. Agencies with 200 or more employees in permanent FT/PT appointments have the option to Part E.2 to E.5.

Part E.1 - Executive Summary: Mission

The NCUA is the independent federal agency created by the U.S. Congress to regulate, charter, and supervise federal credit unions. With the backing of the full faith and credit of the U.S. Government, the NCUA operates and manages the National Credit Union Share Insurance Fund (NCUSIF), insuring the deposits of the account holders in all federal credit unions and the majority of state-chartered credit unions. The agency’s mission is to provide, through regulation and supervision, a safe and sound credit union system which promotes confidence in the national system of corporate credit. The NCUA seeks to achieve this mission through a system of examination, supervision, and risk assessment. The agency strives to recruit and retain a highly qualified and diverse workforce to carry out this mission.

Part E.2 - Executive Summary: Essential Element A - E

<not required>

Part E.3 - Executive Summary: Workforce Analyses

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<not required>

Part E.4 - Executive Summary: Accomplishments

Accomplishments

Culture, Diversity, and Inclusion Council: The Culture, Diversity, and Inclusion Council (CDI Council) includes representatives of employees at all levels (for example, executives, supervisors, and non-supervisors from multiple grade levels) and a diverse spectrum of functional areas (such as the examination program, legal, human resources, and technology). In addition, members are comprised of a cross-section of the agency's staff representing different types of diversity (including race, ethnicity, gender, age, sexual orientation, disability, veteran status, and experience). A National Treasury Employees Union representative is also a member. In addition, CDI Council membership expanded to include the presidents of the agency's employee resource groups, with a limit of eight seats assigned to these groups.

During the calendar year, the agency embarked on a significant effort to assess its culture with the deployment of a culture climate survey covering all staff within the agency. OHR, and OMWI, in partnership with a vendor, designed the survey with guidance from CDI Council representatives. Close to two-thirds of NCUA staff (59 percent) responded to all the survey questions. The vendor provided preliminary analysis of the survey results, which will be combined with results from subsequent focus groups to be held in the first quarter of 2021 to provide a full analysis of the culture within the agency.

Although the COVID-19 pandemic made the CDI Council efforts challenging, it carried out its yearly training requirement virtually. The training was divided into six, two-hour sessions over a two-month period. The training was intended to provide the CDI Council with a strong foundation for cultivating an inclusive organizational culture and assist the group in focusing its efforts for the next several months. Some of the training topics covered were:

- Introduction and CDI Council formation;
- Teambuilding and Introduction to Culture;
- Components of Culture; and
- Engagement

Policy Statements: Confirming his commitment to equal employment opportunity, diversity, and inclusion, the NCUA Chairman issued new policy statements in 2020 to all NCUA employees.

Federal Employee Viewpoint Survey Results: The NCUA has measured inclusion using the U.S. Office of Personnel Management's (OPM) Inclusion Index, a score calculated from a subset of questions from the Federal Employee Viewpoint Survey. The Index was comprised of 20 questions grouped into five categories: Fairness, Openness, Cooperation, Support, and Empowerment. In 2020, OPM deleted many of the questions that comprised the New Inclusion Quotient (New IQ), retaining only 9 of the 20 original index questions. Based on these changes, the NCUA created an "Inclusion Proxy" using these remaining nine questions. Trending the proxy scores from 2015 through 2019, there is a very close approximation to the New IQ. The scores on the nine remaining questions were within 60 basis points from the original New IQ scores. The new proxy score shows an increase of 7.1 percentage points from 2019 to 2020. This is a positive indicator of the NCUA's diversity and inclusion culture.

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	2020	2019	2018	2017	2016	2015
Proxy IQ	72.2%	65.1%	63.8%	65.1%	66.8%	66.7%
New IQ	--	64.6%	63.2%	65.0%	67.0%	67.0%

Source: Office of Personnel Management; Proxy Index,

NCUA

Employee Programs

Employee Resource Group Program: The NCUA’s Employee Resource Group (ERG) program has continued to grow and evolve while adapting to challenges stemming from the ongoing COVID-19 pandemic. In 2020, the groups served as the bridge to connect with other employees by providing additional resources, coordinating special presentations, and creating a support system for the workforce to help them navigate this new reality.

In early 2020, the agency launched its seventh ERG, MPower (an employees with disabilities and ally group), which increased the number of employees engaged in ERG activities and efforts. As of December 2020 (similar to FY20 numbers), ERGs recruited 277 members, or 24.1 percent of NCUA employees. This figure more than doubles the industry standard goal of 10 percent employee membership in ERGs within an organization.

Besides the work necessary to continue to provide the essential tools and support to these groups, the ERGs successfully engaged members in more than 50 initiatives and activities designed to provide professional development efforts, networking, employee retention, and other benefits. The ERGs have continuously contributed in meaningful ways to foster a more inclusive work environment for all employees. Below is an overview of some of the initiatives executed by these groups:

- Umoja hosted a membership meeting that included the agency’s Chairman and a Board Member to discuss challenges and areas of opportunities for its membership;
- SWAN provided a special presentation for members in collaboration with multiple agency offices to discuss the process for reporting inappropriate behaviors;
- MPower sponsored an educational presentation on emergency response and virtual teams for employees with disabilities;
- CULTURA launched new programs, such as the Spanish Assistance Committee;
- Umoja co-hosted 15 OMWI Talks to discuss racial justice in the aftermath of George Floyd’s killing;
- VANS and CULTURA will host a Veterans Day Membership Event - Veterans Day Morale and Diversity Celebration (featuring Captain Isis Rosario-Nieves, “The Salsa Nurse”); and
- VANS developed a mentorship program

Ongoing membership activities, such as cross-ERG collaboration movie club discussions, newsletters, and presentations also took place regularly, including:

- *The Color Purple* movie club discussion hosted by NCUA PRIDE, SWAN, and Umoja
- *And the Band Played On* and PRIDE movie club discussions hosted by NCUA PRIDE;
- *And Yet They Persisted: How American Women Won the Right to Vote, What the U.S. Can Learn from Germany About Facing the Past* and *Brave Not Perfect* book club discussions hosted by SWAN
- CULTURA’s “Café con Leche” presentations on *Unconscious Bias and What does it mean to be Latinx*
- CULTURA’s monthly newsletter for members
- Pride Month newsletter by NCUA PRIDE

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- Juneteenth newsletter by Umoja
- Mid-Autumn Festival newsletter by APIC
- VANS' planned Veterans Day newsletter for members

In addition, all ERGs worked with OMWI on the coordination of the 2020 Special Emphasis Program observances while navigating the challenges of the pandemic. MPower is currently identifying barriers and solutions for employees with disabilities as well as coordinating efforts to educate members and NCUA employees about the importance of understanding and implementing Section 508. These are but a few examples of how ERGs contribute to the betterment of the organizational culture.

Special Emphasis Programs: The NCUA's Special Emphasis Program series is a significant component of the NCUA's efforts to build inclusion and understanding within its workplaces. For nearly all observances, OMWI hosted an event featuring a guest speaker who provided a range of experiences and insights into how to be more intentionally inclusive of each special population. This year, OMWI included a special event to commemorate the 30-year anniversary of the Americans with Disabilities Act (ADA). Many employees attended these events, both in-person (prior to the pandemic) and virtually. The following list includes details of each event:

Special Emphasis Observance	Event	Speaker
African American History	Black Capitalism in America: Black Wall Street and Beyond	Clifton Taulbert, Pulitzer Prize nominated author and entrepreneur
Women's History	Courage in Corsets: Documentary (Central Office Only)	PBS Entertainment
Asian/Pacific Islander Heritage	Mass Imprisonment in America: A presentation by former prisoner and national lecturer Sam Mihara	Sam Mihara, survivor of Japanese internment and national lecturer
LGBTQ+ Pride	Beyond Male and Female	Kate Bornstein, non-binary trailblazer and author
Americans with Disabilities Act Anniversary	Celebrate the ADA Anniversary	Michael Morris, National Disability Institute director; Jennifer Laszlo Mizrah, disabilities rights advocate and president of RespectAbility
Hispanic Heritage	National Hispanic Heritage Month Observance: Hispanics and Latinx Success Stories and Contributions	NCUA Panel: Yazmin Rowe, IT Specialist, OBI David Matheu, Deputy CIO, OCIO Juan Carlos Moran, Credit Union Examiner, Western Region
Disability Employment Awareness	Invisible Disabilities Awareness	Christina Irene, educator, entertainer, and author

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American Indian / Alaska Native Heritage	Nation to Nation: Treaties Between the United States and American Indian Nations	Mandy Van Heuvelen, Cultural Interpreter Coordinator at the National Museum of the American Indian
Veterans Day	Military Women, Our Invisible Veterans	Dr. Kate Hendricks Thomas, academic researcher, storyteller, and U.S. Marine Corps veteran

Also in 2020, OMWI completed its first ERG Annual Report, which included a summary of accomplishments, challenges, and areas of opportunity. This report provided an overview of the current state of the program and helped OMWI identify the next steps to advance the program further.

OMWI Talks: OMWI continued to host facilitated, open discussions for NCUA employees in 2020. These OMWI Talks aim to create a safe space for employees to discuss sensitive diversity and inclusion-related topics. By having conversations about differences, employees can broaden awareness and understanding of others, leverage diversity, and foster greater inclusion. These discussions give employees opportunities to analyze and discuss complex topics and learn how to manage challenges that may affect the workplace environment.

After OMWI Talks took place in January and February, the COVID-19 pandemic disrupted the remaining OMWI Talks that were scheduled in the ensuing months. However, following the George Floyd killing, it was clear that OMWI needed to create an outlet to help employees talk through the racial challenges facing the nation. OMWI Talks were the perfect vehicle for this type of conversation. Initially, OMWI scheduled five virtual OMWI Talk sessions, but because demand was so high, that 10 more sessions were added.

In all, OMWI and the African American employee resource group, Umoja, hosted 15 OMWI Talks throughout June and July, with 378 employees participating in at least one session, but many joined multiple sessions. Participation in each session was limited to 25 employees to allow all participants to use their video cameras during the session. Chairman Hood participated in each of the 15 sessions and more than 60 percent of the agency’s senior leaders, participated in one or more sessions.

Through these conversations, NCUA employees were able to discuss racial injustice openly. It created a safe space for employees to share their experiences with discrimination while giving others an opportunity to support their colleagues, ask questions and learn how they could act as allies and act against inequities in the workplace and beyond.

VIBE: VIBE is an ongoing campaign to improve the agency’s culture by encouraging all employees to make a conscious, deliberate effort to adopt inclusive behaviors and habits. VIBE launched in early 2018 and continues to grow. The initiative focuses on four specific behaviors that help create a greater sense of inclusion and belonging among the agency’s employees

- Value differences
- Intentionally include
- Break biases
- Embrace change

In 2020, OMWI continued the VIBE Speaker Series and introduced a newsletter in response to the COVID-19 pandemic.

- Diversity Explosion: William Frey, one of the nation’s leading demographers, shared an enlightening presentation on Valuing differences, Intentionally including, Breaking biases and Embracing change. Using the U.S. Census, national surveys, and related sources, Frey shared how the rapidly growing “new minorities”—Hispanics, Asians, and Multiracial Americans—along with Blacks and other groups, are

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transforming and reinvigorating the nation's demographic landscape. He discussed their impact on generational change, regional shifts of major racial groups, neighborhood segregation, interracial marriage, and other significant societal issues.

- **Modeling Inclusive Leadership:** For this session, NCUA Chairman Rodney Hood led a conversation with Google Legal Director, Myisha Frazier. The two discussed the value of inclusion and how it contributes to success in the workplace. They also shared best practices on how to overcome challenges and get the most out of people by creating a strong sense of belonging and value.
- **VIBE at a Distance Newsletter:** Once NCUA introduced a full-time, work-from-home posture for all employees, OMWI launched a newsletter to provide guidance and resources for being inclusive remotely. Initially sent out weekly, VIBE transitioned to a bi-weekly publication schedule to help employees adjust to the virtual environment. It includes articles about how to connect with colleagues, how to create work-life balance, and how to address challenges faced by employees from all kinds of diverse backgrounds. OMWI published 15 issues of the newsletter during the first seven months of the remote posture.

Diversity and Inclusion Award: The agency granted this award for the third year in a row to recognize an NCUA employee who exhibited an outstanding commitment to diversity and inclusion. The Diversity and Inclusion Award honors individuals or groups who have demonstrated respect and value for differing backgrounds and points of view within the NCUA and the credit union system, and for supporting, leading, or enhancing the NCUA's diversity and inclusion efforts.

The 2020 honoree was selected for his dedicated and innovative leadership in diversity and inclusion. He serves in a leadership position for CULTURA, the first NCUA Employee Resource Group, which aims to create unity, understanding, and recognition of the Hispanic/Latino culture. In this role, he has participated in multiple recruitment events, developed a membership survey and analyzed results to help the group better serve its members, and launched a monthly newsletter. In addition, he formed the interagency network AHORA (Amigos and Hispanics of Regulatory Agencies) between the Hispanic/Latino Employee Resource groups from multiple federal regulatory agencies. He has demonstrated an innate understanding of how building community is an essential element of creating an inclusive environment within the agency and the broader federal government. The agency created this award in 2017 and presented it for the first time in 2018.

Employee Engagement: The NCUA began developing Engagement Action Plans in 2018 to help the agency strengthen its workforce; grow and develop the leadership competencies in employees throughout the agency; and ensure the ability to attract, develop, manage, and retain the best workforce possible to meet the agency's needs. The plan established several overall goals for the agency, and each NCUA office annually develops a specific Workforce Engagement Action Plan using the results of the Federal Employee Viewpoint Survey (FEVS). In 2020, 87 percent of NCUA employees participated in the FEVS, a 28.2 percent increase over 2018 and a seven percent increase over 2019. The NCUA continues into 2021 with employee engagement planning efforts throughout the agency.

Recruitment and Outreach

The NCUA continues to conduct recruitment and outreach to increase awareness of potential employment opportunities among pools of diverse talent. Most of these outreach and recruitment efforts target groups with less-than-expected participation in the workforce (per Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) and individuals with disabilities (per Executive Order 13548).

The COVID-19 pandemic had a significant impact on the NCUA and its activities during most of 2020. Notwithstanding, the NCUA was able to achieve positive results in its recruitment outreach efforts despite the travel limitations and the implications of social distancing. OMWI and OHR worked together to participate in several first-time virtual recruitment outreach events that included historically black colleges and universities and other minority-serving institutions, disability, and veterans' events. This was not only the NCUA's first time

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attending virtual recruitment events, but it was also the first time many of the sponsoring organizations hosted virtually.

Some of the virtual recruitment outreach events the NCUA attended include:

- Four Equal Opportunity Publications (EOP) Disability and Wounded Warriors events that targeted the disability and veteran populations;
- Howard University, Bowie State University, and George Washington University's 2020 Fall Virtual Career Fairs targeting women and students of color;
- The Accounting & Financial Women's Alliance Women Who Count National Conference;
- Prospanica Conference and Career Expo; and
- The National Black MBA Association Career Expo.

Besides these outreach efforts, OMWI delivered a two-hour diversity and inclusion training session to the agency's Southern Region recruitment outreach team focused on efficiently targeting, messaging, and attracting diverse talent to the agency's job opportunities. The purpose of this specialized training was to help the recruitment outreach team refine its outreach operations using some of the presented approaches and strategies.

Internship Program: Despite the impact of the COVID-19 pandemic, the NCUA sponsored students in three distinct internship programs during 2020. First, OHR used the Pathways Program to attract six students from a variety of backgrounds to participate in its summer internship program.

The program participants performed meaningful projects and tasks, making for an enriching and educational experience. This past year, the NCUA converted one summer intern into a full-time employee through the competitive process.

In addition, OMWI hosted four summer interns from two minority-serving organizations: the Hispanic Association of Colleges and Universities (HACU) and The Washington Center. Like Pathways, the goal of the summer internship program is to provide current college students with meaningful work experience in the Federal government.

Further, the NCUA also partnered with the Office of the Comptroller of the Currency (OCC) on its High School Scholars Internship Program to sponsor four high school student interns. The program provided students from the economically disadvantaged backgrounds enrolled in targeted Washington, DC public and charter schools with an opportunity to work, explore career paths, and gain an understanding of the missions and important work federal regulatory agencies do for the financial services industry.

Training and Leadership Development

Leadership Development: Fifty-six NCUA staff participated in the agency's leadership development programs in 2020. Of these, 55.4 percent of the participants were women and 39.3 percent were employees of color. The former NCUA executive coaching program is now the Senior Staff Position 360 coaching program, which is based on OPM's 360 assessment taken by SSPs in 2020. Additionally, the agency added a leadership coaching program specifically for supervisors.

Mentoring Program: OMWI's formal mentorship program has experienced continuous growth over the last three cycles, with 2020 experiencing the highest number of participants to date at 39 pairings. The program was created in 2016 to provide developmental opportunities, build cross-cultural understanding, and cultivate greater inclusion of all employees. The program's success can be directly attributed to the agency's leadership staff's willingness to devote time to assist new or lesser experienced NCUA personnel reach their career goals.

Opportunities and Next Steps

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Besides the continuation of ongoing OMWI programs and education, some new initiatives that will launch in 2021 include:

Belonging: In 2021, OMWI will focus on how effectively diversity, equity, and inclusion lead to a sense of belonging. This initiative will highlight how belonging is different from inclusion and how belonging enhances the workplace, leading to better results for the agency. While inclusion creates an environment where employees can bring their whole selves to work and a culture that values and celebrates differences, belonging is the feeling employees have when inclusion is done right. When a sense of belonging is achieved, there is an increase in on-the-job effort, engagement, and intent to stay. The NCUA wants employees to feel they belong at the agency.

Culture, Diversity, and Inclusion Council (CDI Council): In 2021, the CDI Council will create a draft action plan to address the results obtained from the culture climate assessment survey and focus groups conducted in late 2020.

Employee Resource Groups: The NCUA will continue to support ERGs to align their work with the NCUA's goals related to diversity and inclusion. This will include the development and launch of the ERG Ambassador Program, which is designed to identify ERG member volunteers willing to support agency-wide recruitment efforts, aid in developing the Special Emphasis Programs, and to support the efforts in launching the young professionals ERG in 2021.

OMWI has identified strategies for improving and measuring the program's effectiveness. These include hosting quarterly meetings with ERG officers and executive sponsors to discuss current challenges, concerns, and needs, and hosting similar meetings with the full membership of each group at the end of the year. OMWI will continue to assess the ERG program and help identify ways in which the groups can be more effective.

As part of OMWI's efforts to increase visibility and awareness of the value and positive impact of these groups, OMWI plans to develop and launch an external ERG Program web page on the NCUA's official website. This will serve as a space to share information, resources, and highlights of each ERG.

Recruitment and Outreach: OMWI will continue to use new communication tools to reach out to prospective applicants that were identified during recruitment outreach events. OMWI is building a robust list of potential employment candidates where they can opt-in and receive current NCUA vacancy announcements by providing their name and email address. Every time a new NCUA vacancy announcement is released to the public, the posting will be sent to members of the email list. Additionally, OHR and OMWI will continue their collaborative recruitment and outreach efforts using a modified approach considering the ongoing offsite posture due to the COVID-19 pandemic. The new approach will continue the use of virtual platforms and the expansion of relationships with organizations holding events during the COVID-19 pandemic.

The NCUA will also be using social media to enhance recruitment efforts. OMWI will tie recruitment efforts into Special Emphasis Programs and work with the agency's ERGs to ensure broad distribution of social media content in partnership with the Office of External Affairs and Communications.

In 2021, OMWI will focus on coordinating and executing a targeted barrier analysis to identify challenges in the hiring and retention of women within the agency.

Training: The agency will incorporate diversity and inclusion training into the learning plans for all NCUA staff. OMWI will also identify new modules for leadership training and a curriculum to incorporate into the leadership development programs.

OMWI Talks: Based on the success of the virtual OMWI Talks hosted in 2020, OMWI will continue these conversations about different topics related to diversity, equity, inclusion and belonging.

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VIBE: The VIBE campaign will continue to play a vital role in promoting diversity and inclusion among the NCUA workforce. OMWI will bring back its popular Leadership Panels, which last occurred in 2019, and invite leaders from ERGs, management development programs, and other senior leaders to participate.

In 2021, OMWI will continue the VIBE Speaker Series and create a VIBE Guide for new employees. This will be presented at new employee orientations and provide an overview of the VIBE behaviors (Value differences, Intentionally include, Break biases, and Embrace change), along with highlighting the programs and services OMWI offers for employees. In addition, OMWI will continue enhancing the VIBE Inclusion toolkit with new resources.

Part E.5 - Executive Summary: Planned Activities

<not required>

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CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

I,

Milagro S. Avalos

am the

(Insert name above)

(Insert official title/series/grade above)

Principal EEO Director/Official for

National Credit Union Administration

(Insert Agency/Component Name above)

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

Milagro S. Avalos

JULY 22, 2021

Signature of Principal EEO Director/Official

Date

Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

RENDELL JONES

Digitally signed by RENDELL JONES

Date: 2021.07.22 10:21:54 -04'00'

Signature of Agency Head or Agency Head Designee

Date

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MD-715 - PART G
Agency Self-Assessment Checklist

The Part G Self-Assessment Checklist is a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715. This self-assessment permits EEO Directors to recognize, and to highlight for their senior staff, deficiencies in their EEO program that the agency must address to comply with MD-715's requirements. Nothing in Part G prevents agencies from establishing additional practices that exceed the requirements set forth in this checklist.

All agencies will be required to submit Part G to EEOC. Although agencies need not submit documentation to support their Part G responses, they must maintain such documentation on file and make it available to EEOC upon request.

The Part G checklist is organized to track the MD-715 essential elements. As a result, a single substantive matter may appear in several different sections, but in different contexts. For example, questions about establishing an anti-harassment policy fall within Element C (Management and Program Accountability), while questions about providing training under the anti-harassment policy are found in Element A (Demonstrated Commitment from Agency Leadership).

For each MD-715 essential element, the Part G checklist provides a series of "compliance indicators." Each compliance indicator, in turn, contains a series of "yes/no" questions, called "measures." To the right of the measures, there are two columns, one for the agency to answer the measure with "Yes", "No", or "NA;" and the second column for the agency to provide "comments", if necessary. Agencies should briefly explain any "N/A" answer in the comments. For example, many of the sub-component agencies are not responsible for issuing final agency decisions (FADs) in the EEO complaint process, so it may answer questions about FAD timeliness with "NA" and explain in the comments column that the parent agency drafts all FADs.





A "No" response to any measure in Part G is a program deficiency. For each such "No" response, an agency will be required in Part H to identify a plan for correcting the identified deficiency. If one or more sub-components answer "No" to a particular question, the agency-wide/parent agency's report should also include that "No" response.

NOTE: All data and program status reflects that of September 30, 2020.

MD-715 - PART G Agency Self-Assessment Checklist



Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP

This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.

 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	Current Part G Questions
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes," please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	Issued September 22, 2020	A.1.a.2
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes		New
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
A.2.a	Does the agency disseminate the following policies and procedures to all employees:			
A.2.a.1	Anti-harassment policy? [see MD-715, II(A)]	Yes		New
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes		New
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:	Yes		
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes		New

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A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes		A.2.c
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	<u>Reasonable Accommodation Policy</u>	A.3.c
A.2.c	Does the agency inform its employees about the following topics:			
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	Every two years via No FEAR Training	A.2.a
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	Every two years via No FEAR Training	New
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	Every two years via No FEAR Training	New
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	Every two years via No FEAR Training Anti-Harassment Training	New
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Every two years via No FEAR Training Anti-Harassment Training	A.3.b
 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments	New Compliance Indicator
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	Annual Diversity and Inclusion Award	New
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes		New

Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION

This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.



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 Compliance Indicator  Measures	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure Met? (Yes/No/NA)	Comments	
B.1.a	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		B.1.a
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	N/A		New
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		B.1.d
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		B.2.a
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [See MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	The Agency Chairman was briefed on 7/1/2020 followed by briefings to other Board Members and agency senior staff later in July. (Exact dates not available due to agency EEO director's departure)	B.2.b
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes		New
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and	Yes		B.3.a



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	eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]			
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling. [see 29 CFR §1614.102(c)(4)]	Yes		New
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		New
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		New
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes		F.3.b
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes		New
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	N/A	NCUA does not have subordinate level components.	New
 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments	
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes		B.2.c & B.2.d
B.3.b	Does the agency's current strategic plan reference EEO/diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	Strategic Objective 3.1: Attract, engage and retain a highly skilled, diverse workforce and cultivate an inclusive environment.	New



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
B.4.a	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.			
	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes		B.3.b
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes		B.4.a
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes		E.5.b
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes		B.4.f & B.4.g
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	Yes	NCUA does not have subcomponents and does not have separate EEO programs within its 3 Regional Offices.	E.1.c
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes		B.4.c
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [See MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes		New
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes		B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I]; EEOC Enforcement Guidance on Vicarious	Yes		New



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	Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]			
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes		B.4.d
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes		New
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes		New
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes		B.1.b
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes		E.2.d
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes		E.2.e
 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments	New Indicator
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:			
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Yes		New
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes		A.3.d
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes		New
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes		New
B.5.a.5	ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes		E.4.b



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 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments	
			New Indicator	
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes		New
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes		D.1.a
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes		D.1.b
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Yes		D.1.c



Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY

This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency’s EEO Program and Plan.

 Compliance Indicator  Measures	C.1 – The agency conducts regular internal audits of its component and field offices.	Measure Met? (Yes/No/NA)	Comments	
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	NCUA does not have subordinate level components.	New
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	NCUA does not have subordinate level components.	New
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	NCUA does not have subordinate level components.	New

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 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		New
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		New
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	As of 9/30/2020, OMWI managed current program of independent fact finder determining harassment. All anti-harassment programs transitioned to a new, separate Office of Ethics Counsel as of 01/01/2021.	New
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	NCUA has a separate grievance process for allegations of harassment. NCUA's new Office of Ethics Counsel assumed responsibility for the Anti-Harassment Program as of 01/01/2021.	New
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	As of 9/30/2020, the anti-harassment function was housed at the OMWI office –	New



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			As of 01/01/2021, OMWI will coordinate with the new Office of Ethics Counsel that is now responsible for the Anti-Harassment program.	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	Yes		New
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes		New
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Yes		New
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes		E.1.d
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	Reasonable accommodation final decisions are made by managers, not by the RA program manager. The reasonable accommodation program was migrated to the Office of Human Resources and has been separate from OMWI as of 01/01/2021.	New
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes		New



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C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes		New
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests in the comments column.	Yes		E.1.e
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	No	The new instruction was posted on February 26, 2021 and will be reported in the FY21 MD715.	New
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	No	The new instruction was posted on February 26, 2021 and will be reported in the FY21 MD715.	New
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes		New
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:			
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.]	Yes		A.3.a.1
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes		A.3.a.4
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes		A.3.a.5
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes		A.3.a.6



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C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes		A.3.a.7
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Yes		A.3.a.8
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes		New
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes		A.3.a.2
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes		New
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes		New
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes		New
 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments	
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes		New
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes	Updates to the merit promotion policy are routed through the Office of Human Resources to ensure full participation by all groups. OMWI routinely assesses award data and leadership development	C.2.a, C.2.b, & C.2.c



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			programs for triggers and possible barriers.	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes		New
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes		New
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes		New
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes		New
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes		New
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes		New
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes		New
 Compliance Indicator  Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments	
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	Agency policies covering non-bargaining unit staff and collective bargaining agreement provisions commit to promote a workplace free of discrimination. No table of penalties exist, but disciplinary/adverse action policies cover taking action against any agency	C.3.a.

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			employee/supervisor/ manager found to have discriminated.	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	No findings of any agency employee/supervisor/manager engaging in discrimination have occurred within the past 5 years, so there was no need to discipline or sanction anyone. If someone had been found to have discriminated, appropriate discipline/sanctions would have been imposed by the agency.	C.3.c
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes		New
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments	
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	EEO Director meets routinely with NCUA Board members; new workforce dashboards were developed to share and review with agency leadership on a quarterly basis.	C.1.a
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		New

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Essential Element D: PROACTIVE PREVENTION

This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.

 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.			
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes		New
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes	The agency currently uses multiple sources for trigger identification. In the future, the agency will also use the newly established employee resource groups, data from workforce surveys, and advanced statistical analyses on workforce data.	New
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes		New
 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes		New
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes		B.2.c.2

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D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes		B.2.c.1
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	Yes	The agency reviews employee climate surveys, employee resource group feedback, focus groups, and special emphasis program feedback.	New
 Compliance Indicator  Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes		New
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes	The PE Exam review identified perceived barriers in FY20. Intervention to address those perceived barriers will be in place in FY21.	New
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes		New
 Compliance Indicator  Measures	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<u>Affirmative Action Plan</u>	New



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D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes		New
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes		New
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes		New



Essential Element E: EFFICIENCY

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

 Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments	
 Measures				
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes		E.3.a.1
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes		E.3.a.2
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes		New
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	The acceptance letter is usually issued within 30 days of receipt of the formal complaint.	New
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes		New
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes		E.3.a.3
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes		New





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E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes		E.3.a.4
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes		E.3.a.7
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	Contractors are required to correct deficiencies in their work product prior to receiving payment. For untimely work products, the agency can request a reconsideration of the contractors' service fees. Poor work products and performance are reflected in the contractors' annual performance reports.	E.2.c
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		New
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes		New
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator	
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes		New
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency	Yes	Another attorney within the Office of	E.6.a



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	representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.		General Counsel, who does not represent the agency in personnel cases, conducts this review.	
E.2.c	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes	Same answer as E.2.b.	New
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes		E.6.b
E.2.e	If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes		E.6.c
 Compliance Indicator  Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments	
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes		E.4.a
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes		E.4.c
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes		D.2.a
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes		New
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes		E.4.d
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes		New
 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments	

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E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:			
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes		E.5.a
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes		E.5.c
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes		E.5.f
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes		New
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes		New
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes		New
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes		New
 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes		E.5.e
E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	The agency has established employee resource groups, noted to be a best practice in workplace inclusion, to increase employee engagement and to increase workplace inclusion. The agency also holds periodic diversity discussions.	E.5.g





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E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes		E.3.a
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Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE

This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
F.1	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.			
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes		F.1.a
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes		E.3.a.6
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		F.2.a.1
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		F.2.a.2
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes		F.3.a.
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
F.2	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.		Indicator moved from E-III Revised	
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes		C.3.d
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes		E.3.a.5
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes		E.3.a.7

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F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes		New
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		F.3.d (1 to 9)
 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments	
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes		New
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes		New

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MD-715 – Part H
Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

(1). Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.c - Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	The new instruction was posted on February 26, 2021 and will be reported in the FY21 MD715.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
FY 2018	The new instruction was posted on February 26, 2021 and will be reported in the FY21 MD715.	01/31/2021		02/26/2021

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Minority and Women Inclusion	Monica Davy	Yes

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Title	Name	Performance Standards Address the Plan? (Yes or No)
NCUA Deputy Executive Director	Rendell Jones	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/31/2021	Route instruction through proper NCUA channels for input before final agency approval.	Yes		02/26/2021

Report of Accomplishments

Fiscal Year	Accomplishments

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(2). Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.c.1 - Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	<p>The NCUA does not have a personal assistance services instruction in place. The Office of Minority and Women Inclusion is working on a new RA instruction which has gone through agency review. The new RA instruction includes personal assistance services.</p> <p>The NCUA posted 02/26/2021, PAS Fact Sheet National Credit Union Administration (ncua.gov), and will be resolved for MD-715 FY21).</p>

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
FY 2018	The new RA instruction has included personal assistance services. Once the new instruction is finalized, OMWI will post on NCUA's public website	01/31/2021		02/26/2021

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Minority and Women Inclusion	Monica Davy	Yes

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Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/31/2021	Post the new RA instruction, including personal assistance services on the NCUA's public website.	Yes		02/26/2021

Report of Accomplishments

Fiscal Year	Accomplishments

NOTE: All data and program status reflects that of September 30, 2020

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

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Overall under participation in the agency's workforce (Including Principal Examiner (CU12) and senior leadership (CU15/SSP positions))	Table A1 Table A2 Table A4P Table A6P	<p>The NCUA shows a less-than-expected participation rate for the groups below when compared to their labor force benchmarks:</p> <ul style="list-style-type: none"> • Total Females (All regions except Central; driven by categories below) <ul style="list-style-type: none"> ○ White females (All regions and total) ○ Black females (Western) ○ Asian females (Eastern/Southern) ○ NHPI females • Hispanic or Latino males and females (Overall) • Black males (Eastern/Western) • NHPI males (Eastern/Southern) • American Indian or Alaska Native males and females (Overall) <p>In the mission critical occupation (0580), females are underrepresented across the board.</p>

EEO Group(s) Affected by Trigger

EEO Group
All Males
All Females (Mission Critical 0580)
Hispanic or Latino Males
Hispanic or Latina Females
White Males
White Females
Black or African American Males (Eastern/Western)
Black or African American Females (Western)
Asian Males
Asian Females (Southern/Western)

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EEO Group
Native Hawaiian or Other Pacific Islander Males (Eastern/Southern)
Native Hawaiian or Other Pacific Islander Females
American Indian or Alaska Native Males
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Identified areas of underrepresentation.
Complaint Data (Trends)	Yes	EEO Program Manager reviews and summarizes complaint data in NoFEAR report. NCUA has a low number of complaints, and little data for statistical purpose, but it is reviewed.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	All sources of any type of complaint or grievance are reviewed within the EEO Program.
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS results are routinely reviewed. The agency will also review gender combined with ethnicity information as data indicate in a climate survey in the beginning of FY21, to be reported in the next MD-715.
Exit Interview Data	Yes	This is a new program as of 2018, and although there is little data, there are no comments on RNO harassment or discrimination as bases for separation.
Focus Groups	No	Planned for FY21.
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	The OMWI Annual Report to Congress is a calendar year report, and its reporting requirements are established by the Dodd-Frank Wall Street Reform and Consumer Protection Act. The NCUA also submits the FEORP and DVAAP reports to OPM.

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Other (Please Describe)	Yes	OMWI performs internal analysis using OHR workforce data and OPM applicant flow data - reviewing data trends and quarterly dashboards.

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No. (But partial) The agency is reviewing triggers and initiating discussion on barrier analysis. A review of the PE Exam process has been on-going to identify potential barriers within that process.	No. Potential barriers have been identified, and the review is still ongoing. NCUA has identified potential issues that contribute to barriers and an action plan is being created.

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
Outreach efforts are still being widened and further targeted to get the most diverse applicants possible. The agency is also now starting to focus attention on the hiring process to determine barriers in the selection of minority applicants who are referred. There is an on-going review of the PE Exam process since this is a critical step for the mission critical workforce (~2/3 of NCUA total) and effects employee retention.

Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
The agency's Office of Minority and Women Inclusion, Office of Human Resources, the Culture, Diversity, and Inclusion Council, Region leadership, and the employee resource groups will work closely together to accomplish the goals set forth in the NCUA 2018-2022 Diversity and Inclusion Strategic Plan.	1/1/2018	12/30/2022	Yes		

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Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
OHR Director	Towanda Brooks	Yes
OMWI Director	Monica Davy	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
10/31/2021	Quarterly OHR and OMWI meetings to collaborate on accomplishing goals set forth in the Diversity and Inclusion Strategic Plan.		ONGOING
10/31/2021	Quarterly Culture, Diversity, and Inclusion Council meetings that include employee resource group members and representatives from regional and central offices as well as the union.		ONGOING
10/31/2021	Expanded outreach efforts between OMWI/OHR to use new outreach tools to reach a larger diverse applicant pool.		ONGOING
10/31/2021	Applicant Flow Data (AFD) is being shared with Regional directors to a greater extent, and with NCUA leadership. Regions are increasing their outreach and using new outreach methods to attract a larger number of diverse applicants.		ONGOING
10/31/2021	Review of Principal Examiner process to identify obstacles within the process that interfere with minority groups passing the exam. This is an issue of pipeline and overall retention since many may leave after not passing the exam.		ONGOING

Report of Accomplishments

Fiscal Year	Accomplishments
2020	<p>There are a number of positive trends in relation to the status of minority representation within NCUA. The improvements are as follows:</p> <ul style="list-style-type: none"> • The Hispanic representation in the agency has trended below the CLF, but has seen higher participation rates: <ul style="list-style-type: none"> - The onboard representation of Hispanic or Latino males increased from 2.28 percent of the workforce in Fiscal Year 2014 to 2.97 percent in 2019. Although slightly down from

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	<p>2019, this overall increase is still notable and remaining somewhat constant.</p> <ul style="list-style-type: none">- The onboard representation of Hispanic or Latina females increased from 2.03 percent of the workforce in Fiscal Year 2014 to 3.59 percent in 2020. This represents an increase of over one percent and is slightly higher from 2018.• The percentage of females in senior leadership (CU15/SSP) positions is now slightly higher than the percentage of females within the total workforce (43.8 vs 43.1).<ul style="list-style-type: none">○ The percentage of Black/African American females increased slightly from FY19 from 6.5 to 7.7 percent. <p>The NCUA attributes this positive trend to the agency's focus on targeted recruitment outreach, focused diversity awareness, and the continually evolving and expanded unconscious bias training.</p> <p>The OHR barrier analysis on the PE Exam process identified potential barriers within the PE process.</p> <p>During the review, short-term and long-term strategies were identified that can potentially ameliorate these obstacles that were identified within the process.</p>
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NOTE: All data and program status reflects that of September 30, 2020

MD-715 – Part J

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

The NCUA was just under the 12 percent (11.8) benchmark for total onboard PWDs at the end of FY2020. During early FY21, the NCUA had a campaign for individuals to update their self-identification, and the PWD numbers increased well above the benchmark. Nonetheless, we are still reporting the slight shortfall in the agency's CU-11 and above disability statistics based on the data available as of September 30, 2020. PWDs at each of the two NCUA grade level clusters at the end of FY20 were as follows:

- 12.3 percent of the NCUA staff CU-10 and below reported a disability.
- 11.8 percent of the NCUA staff CU-11 and above reported a disability.

EEOC 501 regulations specify that employees not paid under the General Schedule can be compared to those under the General Schedule based on salary cutoffs at the Washington, DC Locality. When the CU pay scale was converted to the GS scale at each of the two clusters, the NCUA was slightly below the benchmark at each level (cutoff was GS-10 Step 10 base salary compared to CU base salary).

- 11.7 percent of employees paid a total salary at the GS-10 and below level equivalent reported a disability.
- 11.9 percent of employees paid a total salary at the GS-11 and above level equivalent reported a disability.

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Based on these GS10 salary comparisons we identified triggers for those PWD both above and below the cutoff.

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

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

The NCUA was above the 2 percent benchmark for onboard PWTDs at the end of FY2020. This figure was 2.9 percent (unchanged from 2019). PWTDs at each of the two grade level clusters at the end of FY20 were as follows:

- 4.7 percent of the NCUA staff CU-10 and below reported a targeted disability.
- 2.7 percent of the NCUA staff CU-11 and above reported a targeted disability.

EEOC 501 regulations specify that employees not paid under the General Schedule can be compared to those under the General Schedule based on salary cutoffs at the Washington, DC Locality. When the CU pay scale was converted to the GS scale at each of the two clusters, the NCUA was also above the benchmark at each level (cutoff was GS10 Step 10 base salary compared to CU base salary). The NCUA has a different grade structure and the CU-11/12 is our most important split.

- 3.7 percent of employees paid a base salary at the GS-10 and below level equivalent reported a targeted disability.
- 2.8 percent of employees paid a base salary at the GS-11 and above level equivalent reported a targeted disability.

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

In early FY21 (to be reflected in the next MD-715 report), the NCUA resurveyed the workforce to update employees' disability status. Upon completion, the NCUA exceeded the EEOC PWD and PWTD goals in all categories. The NCUA OMWI distributes a quarterly workforce dashboard to all NCUA staff, and the dashboards are sent directly to the NCUA leadership under memo and posted in the agency's intranet. The dashboards clearly indicate the PWD/PWTD benchmarks against current NCUA workforce numbers.

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

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

Yes 0 No 0

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 by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	6		6	Lisa Bazemore, Lead Human Resources Specialist, Office of Human Resources, mbazemore@ncua.gov
Answering questions from the public about hiring authorities that take disability into account	6		6	Lisa Bazemore, Lead Human Resources Specialist, Office of Human Resources mbazemore@ncua.gov

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Processing reasonable accommodation requests from applicants and employees	2		2	Stephanie Smith, Senior EEO Specialist, Office of Minority and Women Inclusion, ssmith@ncua.gov
Section 508 Compliance (3 FT contractors and .5 FTE, Federal)	4		1	Nickol Davenport, Website Administrator/Section 508 Coordinator, Office of External Affairs and Communications, edavenport@ncua.gov
Architectural Barriers Act Compliance	1		1	Alejandro Holguin, Facilities Manager, Office of the Chief Financial Officer, aholguin@ncua.gov
Special Emphasis Observances for PWD and PWTD	1		1	Gladymar Rivera-Virella, EEO Specialist, Office of Minority and Women Inclusion, GVirella@ncua.gov

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

Yes 0

No 0

OMWI and OHR staff attend yearly disability workshops at the Federal Dispute Resolution Conference (FDR) and/or EEOC’s Examining Conflicts in Employment Laws (EXCEL) training conference.

Additionally, human resources staff receive on the job training regarding the sourcing, use and processing of various hiring appointing authorities, and their associated required documentation. New specialists are trained by senior specialists on the agency disability program and responsibilities.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Yes 0 No 0

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

The NCUA participates in a number of activities to enhance outreach to individuals with disabilities. These efforts include:

- Maintaining a “talent bank” of Schedule A applicants who apply for agency positions.
- Participating in targeted outreach events sponsored by *Career Expo for People with Disabilities & Wounded Warrior*, *National Association for the Deaf*, and *Careers & the Disabled* magazine.
- Expanding the NCUA’s outreach through LinkedIn Recruiter and the USAJOBS Resume Mining tool to reach diverse applicants, including those with disabilities.
- Offering the Workforce Recruitment Program Services as an additional resource for managers to source potential applicants to fill vacant positions, in addition to the regular competitive recruitment process.
- Distributing NCUA vacancy announcements to a newly established E-Mail distribution list of potential applicants that have expressed interest in NCUA opportunities during recruitment and outreach events.
- Posting a full-page ad in *DiversAbility* magazine sponsored by DiversityComm.

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

The agency uses all available and appropriate hiring authorities to employ persons with disabilities. The NCUA's recruitment and outreach efforts included the following:

- Using LinkedIn. This tool allows the NCUA to expand outreach efforts to a more diverse pool of applicants, to include targeting and connecting with various disabled veterans' groups and communities in LinkedIn.
- Distributing NCUA vacancy announcements to over 570 diverse organizations, colleges, and universities. This outreach effort includes veterans' organizations and organizations focused on hiring individuals with disabilities.
- Posting All NCUA vacancy announcements on targeted websites to ensure maximum distribution to a diverse audience, which includes individuals with disabilities.
- Maintaining a talent bank of Schedule A applicants, which includes disabled veterans who apply for positions with the agency.
- Using the USAJobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a disability rating of 30% or more.
- Distributing NCUA vacancy announcements to a newly established E-Mail distribution list of potential applicants that have expressed interest in NCUA opportunities during recruitment and outreach events.
- Leveraging social media channels established by the NCUA's Office of External Affairs and Communications to announce the NCUA's participation at diverse recruitment outreach events.

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.

The Disability Recruitment Program Manager uses a searchable Schedule A candidate database to assist hiring managers. Human Resources hiring specialists discuss the process and review the Schedule A database with managers for every recruitment, and managers are encouraged to consider all available candidates prior to posting the vacancy. Additionally, once vacancy announcements are posted, each specialist is responsible for confirming the eligibility of qualified Schedule A candidates prior to issuing certificates to the hiring managers.

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Schedule A candidates may apply to agency postings through a vacancy announcement. Candidates who apply to a vacancy announcement are reviewed to determine their qualifications and eligibility. Thereafter, qualified candidates are forwarded to the hiring official on a referral list for consideration.

Once the candidate's application and supporting documentation are received, the coordinator will conduct a qualifications analysis of all materials submitted. After a careful review, candidates are notified of their status (qualified/not qualified). Qualified candidates are added to the agency's Schedule A database. Each HR Specialist is required to review the database prior to posting the vacancy announcement and refer qualified candidates to the hiring official (at the hiring official's request).

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

Yes 0 No 0 N/A 0

The agency has a supervisory orientation program and a resource center for employees who are newly appointed into supervisory positions. The resource center tools provide an overview of training requirements as well as immediate access to external training, webinars, and job aids.

The Schedule A job aid tools cover the hiring authority details and answer several commonly asked questions. In addition to the supervisory training and resource center tools, each HR specialist is responsible for educating managers on the Schedule A hiring authority and process during the recruitment/hiring process.

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 Office of Human Resources distributes all vacancy announcements to more than 550 diverse organizations. This includes organizations focused on hiring individuals with disabilities.

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

Table B8 indicates the agency hired 6 PWD (including 1 PWTD) out of a total of 92 total new hires. This represents 6.5 percent PWD new hires and 1.0 percent for PWTD. These numbers are both down from previous years.

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

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

None of the new hires (n=22) for our largest mission critical occupation (series 0580) were self-identified as PWD or PWTD.

Total
 -Qualified: 756
 -Referred: 292
 -Selected: 22

PWD
 - Qualified: 35
 - Referred: 20
 - Selected: 0

PWTD
 - Qualified: 15
 - Referred: 11
 - Selected: 0

This suggests a trigger for both PWD and PWTD among new hires in the permanent mission critical workforce.

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

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

None of the internal promotions (n=23) for mission critical occupations (series 0580) were self-identified as PWD or PWTD, although PWTD does not show a trigger in the qualifications.

PWD

- Relevant Pool: 11.8%
- Applied: 97 (7.9%)
- Qualified: 28 (8.9%)

PWTD

- Relevant Pool: 3%
- Applied: 49 (4.0%)
- Qualified: 13 (4.1%)

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.

- | | | |
|------------------------------|-------|------|
| a. Promotions for MCO (PWD) | Yes 0 | No 0 |
| b. Promotions for MCO (PWTD) | Yes 0 | No 0 |

None of the internal promotions (n=23) for mission critical occupations (series 0580) were self-identified as PWD or PWTD.

PWD

- Relevant Pool: 11.8%
- Applied: 97 (7.9%)
- Qualified: 28 (8.9%)
- Referred: 26 (9.8%)
- Selected: 0

PWTD

- Relevant Pool: 3%
- Applied: 49 (4.0%)
- Qualified: 13 (4.1%)
- Referred: 13 (4.9%)
- Selected: 0

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

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

A. ADVANCEMENT PROGRAM PLAN

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

The NCUA's primary occupation is the Credit Union Examiner (CUE). Entry-level CUE positions are advertised and recruited as a career ladder position with promotion opportunity to a target level of CU-12. CUEs are provided extensive training to develop and reach the full performance level.

Note: All CUE announcements are open to Schedule A candidates.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

Leadership developmental training opportunities are offered through the Division of Training and Development. The programs are designed to provide competency-based leadership training. These programs include:

- Aspiring Leader Program: a program offered by the Graduate School's Center for Leadership and Management.
- Executive Leadership Program: a 9-month program offered to non-supervisors. Participants complete a variety of activities including a developmental detail, formal training sessions, etc.
- Management Development Program: an 18-month developmental program for non-supervisors. Candidates gain experience in defining project scopes, delegating work, developing others, etc.
- Excellence in Government Fellows: a 12-month program for supervisors/managers. Candidates are able to enhance their skills through a combination of coursework, action-learning projects, executive coaching, and government-wide networking. Fellows remain in their full-time jobs, meet every six weeks, and spend a total of 24 days in session.
- NCUA Executive Training Program: an 18-month program for senior level supervisors. This program prepares employees to transition from supervisory or managerial positions into senior leadership positions within the agency.
- Executive Coaching Program: a 12-month program for the NCUA's executive staff. The program is designed to help managers become more highly effective leaders, reinforce leadership competencies, enhance performance, etc.

In addition, the agency offers a series of training opportunities through its internal training catalog, external training organizations, agency shadowing assignments, and opportunities to participate in short-term detail assignments. The agency also provides career development opportunities through its agency-wide mentorship program.

NOTE: These programs are not presented in Tables A/B12 & 20 because they are available for grade ranges and do not align with those tables. Also, some leadership development programs such as the Management Development Program are two-year programs and applications were processed in FY20 so those are not reported here even though participants remain in those programs through FY21.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	39	39	10	10	1	1
Coaching Programs	35	35	3	3	0	0
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	15	6	4	2	1	1

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

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

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

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

C. AWARDS

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

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

Table B13 shows there were no time-off awards given in 2020.

The majority of cash awards given fell in the \$500 or less category (1,570). For that award size, 265 of the awards were received by a PWD employee, while 64 of those awards were received by a PWTD employee. The next highest number of awards was the \$501-\$999 category (264) with 44 awards going to a PWD and 14 going to a PWTD. For awards \$999 and lower, both PWD and PWTD exceeded workforce composition, and increased from 2019 totals.

There is still a trigger in the \$1,000+ awards category for PWTD. The agency made 248 awards in the \$1,000+ category, with 4 of them given to PWTD individuals. (Note: There were only two \$5000+ awards given within the agency.)

	PWD	PWTD	(percentages)
Workforce	11.8	2.9	
≤ \$500	16.9	4.1	
\$501-\$999	16.7	5.3	
\$1,000-\$1,999	16.3	1.9	
\$2,000-\$2,999	16.1	0.0	
\$5,000+	00.0	0.0	

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

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

The Quality Step Increase section of Table B13 does not apply to NCUA because the agency is on a merit-pay system. It is not an award similar to a QSI, since the vast majority of employees receive a merit raise yearly. The NCUA has not conducted an analysis of potential differentials in merit pay increases for PWD/PWTD employees as compared to other similarly situated employees in the same occupations or grades.

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

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

D. PROMOTIONS

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

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

(Table B11, relevant applicant pool = CU grade below)

- SES (SSP): 4 vacancies; 97 applied; 26 qualified; 23 referred; 4 hired.
 - PWD relevant applicant pool: 11.68
 - 8 applied (8.25)
 - 1 qualified (3.85)
 - 0 hired
- CU15: 3 vacancies; 101 applied; 32 qualified; 28 referred; 4 hired
 - PWD relevant applicant pool: 9.89
 - 3 applied (2.97)

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- 0 qualified
- CU14: 15 vacancies; 506 applied; 156 qualified; 108 referred; 11 hired
 - PWD relevant applicant pool: 10.14
 - 40 applied (7.91)
 - 13 qualified (8.33)
 - 10 referred (9.26)
 - 1 hired (9.09)
- CU13: 10 vacancies; 318 applied; 93 qualified; 74 referred; 9 hired
 - PWD relevant applicant pool: 14.63
 - 21 applied (6.60)
 - 4 qualified (4.30)
 - 3 referred (4.05)
 - 0 hired

For CU15 there were no qualified candidates, therefore cannot identify a trigger for referred or selected.

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

e. SES		
i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0
f. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0
g. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0
h. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

(Table B11, relevant applicant pool = CU grade below)

- SES (SSP): 4 vacancies; 97 applied; 26 qualified; 23 referred; 4 hired.
 - PWTD relevant applicant pool: 0.73
 - 4 applied (4.12)
 - 1 qualified (3.85)
 - 0 hired
- CU15: 3 vacancies; 101 applied; 32 qualified; 28 referred; 4 hired
 - PWTD relevant applicant pool: 1.83
 - 2 applied (1.98)
 - 0 qualified
- CU14: 15 vacancies; 506 applied; 156 qualified; 108 referred; 11 hired
 - PWD relevant applicant pool: 2.70
 - 20 applied (3.95)
 - 6 qualified (3.85)

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- 5 referred (4.63)
- 0 hired
- CU13: 10 vacancies; 318 applied; 93 qualified; 74 referred; 9 hired
 - PWTD relevant applicant pool: 3.83
 - 13 applied (4.09)
 - 1 qualified (1.08)
 - 1 referred (1.35)
 - 0 hired

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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.

- | | | |
|-----------------------------|-------|------|
| i. New Hires to SES (PWD) | Yes 0 | No 0 |
| j. New Hires to GS-15(PWD) | Yes 0 | No 0 |
| k. New Hires to GS-14 (PWD) | Yes 0 | No 0 |
| l. New Hires to GS-13(PWD) | Yes 0 | No 0 |

Qualified applicant pool (QAP) (Table B15)
 SES (SSP): 175 applied, 84 qualified, 52 referred, 2 new hires
 PWD QAP, 2.38; PWD new hires, 0
 CU-15: 176 applied, 169 qualified, 17 referred, 0 new hires
 PWD QAP, 6.51; PWD new hires, 0
 CU-14: 588 applied, 374 qualified, 126 referred, 3 new hires
 PWD QAP, 7.22; PWD new hires, 33.33 (1 out of 3)
 CU-13: 1021 applied, 542 qualified, 150 referred, 2 new hires
 PWD QAP, 5.12; PWD new hires, 0

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

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

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Qualified applicant pool (QAP) (Table B15)
 SES (SSP): 175 applied, 84 qualified, 52 referred, 2 new hires
 PWTD QAP, 0; PWTD new hires, 0
 CU-15: 176 applied, 169 qualified, 17 referred, 0 new hires
 PWTD QAP, 2.96; PWTD new hires, 0
 CU-14: 588 applied, 374 qualified, 126 referred, 3 new hires
 PWTD QAP, 3.48; PWTD new hires, 33.33 (1 out of 3)
 CU-13: 1021 applied, 542 qualified, 150 referred, 2 new hires
 PWTD QAP, 2.17; PWTD new hires, 0

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

a. Executives

- i. Qualified Internal Applicants (PWD) **Yes 0** No 0
- ii. Internal Selections (PWD) **Yes 0** No 0

b. Managers

- i. Qualified Internal Applicants (PWD) Yes 0 No 0
- ii. Internal Selections (PWD) Yes 0 No 0

c. Supervisors

- i. Qualified Internal Applicants (PWD) **Yes 0** No 0
- ii. Internal Selections (PWD) **Yes 0** No 0

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The NCUA does not identify a separate “manager” category. Executives (senior staff) are also managers, so we choose to use that category. Supervisors here are those that are not senior staff (SSP).

Executive (SSP) Total: 97 applied, 26 qualified, 23 referred, 4 selected
 PWD relevant applicant pool: 5.15 (8)
 PWD qualified: 3.85 (1)
 PWD selected: 0

Supervisor Total: 246 applied, 82 qualified, 74 referred, 11 selected
 PWD relevant applicant pool: 4.15 (10)
 PWD qualified: 2.44 (2)
 PWD selected: 0

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

a. Executives

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

b. Managers

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

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The NCUA does not identify a separate “manager” category. Executives (senior staff) are also managers, so we choose to use that category. Supervisors here are those that are not senior staff (SSP).

Executive (SSP) Total: 97 applied, 26 qualified, 23 referred, 4 selected
 PWTD relevant applicant pool: 1.47 (4)
 PWTD qualified: 3.85 (1)
 PWTD selected: 0

Supervisor Total: 246 applied, 82 qualified, 74 referred, 11 selected
 PWTD relevant applicant pool: 2.26
 PWTD qualified: 1.22 (1)
 PWTD selected: 0

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

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

The NCUA posted 2 external vacancy announcements for executive or supervisor positions in FY20 but had no PWD applicants. The NCUA has no manager category because executives are also managers.

There was one supervisor vacancy announcement, with one PWD/PWTD applicant, who was not selected.

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

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

There were two external hire announcements for executives or supervisors in FY20, but no PWTD applicants. The NCUA has no manager category because executives are also managers.

There was one supervisor announcement, with one PWD/PWTD applicant, who was not selected.

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Yes 0 No 0 **N/A 0**

The NCUA did not have any Schedule A staff eligible for conversion in 2020.

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

a. Voluntary Separations (PWD)	Yes 0	No 0
b. Involuntary Separations (PWD)	Yes 0	No 0

In 2020, there were 61 total separations (down from 91 in 2019): 12 were PWD including one PWTD.

PWD Inclusion Rate: 11.8
 PWD Overall Separation Rate: 19.7
 PWD Resignation: 25.0
 PWD Retirement: 22.7
 PWD Other: 5.9

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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.

Voluntary Separations (PWTD)	Yes 0	No 0
Involuntary Separations (PWTD)	Yes 0	No 0

In 2020, there were 61 total separations (down from 91 in 2019): 12 were PWD including one PWTD.

PWTD Inclusion Rate: 3.0
PWTD Overall Separation Rate: 1.6
PWTD Resignation: 5.0

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.

OHR reviewed exit survey data with OMWI and found no comments suggesting that disability was the reason for separation. NCUA has a higher separation rate for PWD than non-PWD, but those exiting have not included disability causes in their comments.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

The internet address on the NCUA’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 is <https://www.ncua.gov/accessibility->

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[statement](#) (Note: The NCUA's reasonable accommodation policy includes Section 508 for accommodation purposes, including instructions for filing a complaint, but the policy does not go into details regarding the Section 508 statute.)

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.

The NCUA amended the Accessibility Statement contained at its public website at <https://www.ncua.gov/accessibility-statement> to include notice of employees' and applicants' rights under the Architectural Barriers Act, and included a description of how to file a complaint.

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

The Section 508 Accessibility Program Policy was approved and distributed December of 2017. The Office of the Chief Information Officer created a Section 508 Resource Center on our internal NCUA Central site. The site offers training resources for staff and contractors, as well as other resources for meeting compliance and learning about accessibility. In 2019, the Section 508 Program team began the transition from the Office of the Chief Information Officer to the Office of External Affairs and Communications to streamline the process of making public website content accessible. This transition was completed in 2020. The Office of External Affairs and Communications actively identifies areas that need remediation and/or updating. All new NCUA content must be Section 508 compliant before it is posted on the public-facing websites. The Office of External Affairs and Communications works with content owners and creators to remediate deficiencies. The agency accessibility statement has been updated and posted on NCUA.gov.

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.)

10-20 business days.

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

The NCUA's program includes timely processing of requests; providing timely approvals of accommodation requests; conducting training for managers and supervisors; consulting with managers, supervisors, and employees on the process and the laws governing reasonable accommodations; and being proactive regarding the needs of persons with disabilities. In 2021 the RA program moved to OHR to keep the RA process and determinations separate from EEO processes. This change will be included in the 2021 MD-715.

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

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

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

On July 10, 2020, the EEOC's Agency Oversight Division within the Office of Federal Operations provided the OMWI office feedback and guidance based on their

(EEOC's) review of the updated draft reasonable accommodation instruction. The PAS Fact Sheet appears on the NCUA intranet as well as the public website at this link: <https://www.ncua.gov/about/diversity-inclusion/workplace-resolutions/pas-fact-sheet>. PAS information was posted in March 2021, which falls outside the FY20 time period for this report. However, it is included here as a status update to EEOC.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?
Yes 0 No 0 **N/A 0**
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?
Yes 0 No 0 **N/A 0**
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

There was only one complaint involving harassment due to disability and there has been no finding of discrimination, nor has there been a settlement.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?
Yes 0 **No 0** N/A 0
2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?
Yes 0 **No 0** N/A 0
3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

The agency had no complaints filed, nor any findings of discrimination, involving the failure to provide a reasonable accommodation during FY20.

Section VII: Identification and Removal of Barriers

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

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

Yes 0 **No 0**

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

Yes 0 No 0 **N/A 0**

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

Trigger 1	There are triggers for individuals with disabilities and individuals with targeted disabilities in the areas of new hires, promotions, separations, and awards.	
Barrier(s)	Not yet identified, although an initial Principal Examiner (PE) Exam barrier analysis has identified potential barriers for RNO and gender within the PE Exam process that would also affect PWD.	
Objective(s)	Review policies, practices, and procedures that may be creating a barrier for the employment and career advancement of individuals with disabilities and targeted disabilities.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
OMWI and OHR Directors		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Onboard, new hires, separations, applicant flow for mission critical occupation and internal merit promotions; separations, awards.
Complaint Data (Trends)	Yes	
Grievance Data (Trends)	No	

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Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)		Yes			
Climate Assessment Survey (e.g., FEVS)		Yes			
Exit Interview Data		Yes	Limited data available, although OHR review indicated no comments about disability status that were identified as a factor in leaving the agency.		
Focus Groups		Yes	Focus groups were completed as part of the Climate Survey and covered multiple issues in the workforce.		
Interviews		No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		Yes			
Other (Please Describe)		Principal Examiner Test Data	Demographics and data regarding attempts and success or failure in passing promotional test.		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
12/31/2022	Barrier analysis of PE test	Yes			
Fiscal Year	Accomplishments				
2019	As a result of a previous OPM adverse impact analysis of the Principal Examiner (PE) Certification Program Assessment, OHR is reviewing the assessment and testing process to identify and mitigate root causes (barriers) for failure of the assessment. Successful completion of the PE Certification Assessment is required for Credit Union Examiners to be promoted to the full performance level, PE (CU-0580-12).				

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

The review of the PE Certification Program and testing procedures is ongoing. An agency-wide survey of stakeholders was conducted, and the results identified perceived/potential barriers and the catalysts for those barriers. Using this information, the agency created a taskforce of Principal Examiners and Supervisory Examiners to develop training and resources for examiners and supervisors. The

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training and resources produced by the taskforce will better prepare examiners for the PE Certification Assessment and aim to mitigate barriers.

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

In addition to the ongoing PE/SE review, the agency created an examiner career progression checklist to assist newly hired examiners in understanding the requirements to achieve the full performance level. The agency also continues to emphasize to examiners that ADA reasonable accommodations were available for testing purposes. Lastly, the agency improved the feedback process for examiners who were unsuccessful in the Job Simulation Exercise assessment. Feedback is now more targeted regarding the examiner's deficiencies, as opposed to the past practice of providing general feedback. To date, there is no formal measurement of the impact of these activities, but informal feedback from examiners and supervisors has been positive. Future surveys assessments may be deployed to evaluate the impact of the additional resources provided to the examiners.

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.

The approach to address perceived and potential barriers is one of continuous process improvement. The work of the PE/SE review is ongoing, and the training and resources produced by the review recommendations will be implemented, assessed for effectiveness, and modified as necessary. While the review will be completed in the 4th quarter of 2021, the agency will continue to actively monitor assessment processes on a continuing basis to continue to mitigate any identified barriers.

NOTE: All data and program status reflects that of September 30, 2020