EEOC FORM U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

# **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  $\underline{PWD}$  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)	<mark>Yes 0</mark>	No 0
b.	Cluster GS-11 to SES (PWD)	<mark>Yes 0</mark>	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  $\underline{PWTD}$  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. <u>PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY</u> <u>PROGRAM</u>

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	Collateral	
		Time	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 0No 0b. New Hires for MCO (PWTD)Yes 0No 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.

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)

b. Promotions for MCO (PWTD)

<mark>Yes 0</mark> No 0 <mark>Yes 0</mark> 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 <u>PWD</u> 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 (PW	D) Yes	0	No (	0
b.	Selections (PW	D) Yes	0	No (	0

Do triggers exist for <u>PWTD</u> 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 (	) <mark>No O</mark>
b.	Selections (PWTD)	Yes (	) <mark>No O</mark>

# 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)	<mark>Yes 0</mark>	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.)

L				
		PWD	PWTD	(percentages)
	Workforce	11.8	2.9	
	<u>&lt;</u> \$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	
l				

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.

 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	<mark>N/A 0</mark>
b. Other Types of Recognition (PWTD)	Yes 0	No 0	<mark>N/A 0</mark>

### D. PROMOTIONS

Does your agency have a trigger involving <u>PWD</u> 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)	<mark>Yes 0</mark>	No 0
ii.	Internal Selections (PWD)	<mark>Yes 0</mark>	No 0
b. Grade	e GS-15		
i.	Qualified Internal Applicants (PWD)	Yes 0	No 0
ii.	Internal Selections (PWD)	Yes 0	No 0
c. Grad	e GS-14		
i.	Qualified Internal Applicants (PWD)	<mark>Yes 0</mark>	No 0
ii.	Internal Selections (PWD)	Yes 0	No 0
d. Grad	e GS-13		
i.	Qualified Internal Applicants (PWD)	Yes 0	No 0
ii.	Internal Selections (PWD)	<mark>Yes 0</mark>	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)
  - o 1 qualified (3.85)
  - $\circ \quad \text{0 hired} \quad$
- CU15: 3 vacancies; 101 applied; 32 qualified; 28 referred; 4 hired
  - PWD relevant applicant pool: 9.89
  - o 3 applied (2.97)

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- o 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)
  - $\circ$  4 qualified (4.30)
  - 3 referred (4.05)
  - o 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 <u>PWTD</u> 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	<mark>No 0</mark>
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)
    - o 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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- o 5 referred (4.63)
- o 0 hired
- CU13: 10 vacancies; 318 applied; 93 qualified; 74 referred; 9 hired
  - PWTD relevant applicant pool: 3.83
  - 13 applied (4.09)
  - o 1 qualified (1.08)
  - $\circ$  1 referred (1.35)
  - $\circ$  0 hired

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Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> 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)	<mark>Yes 0</mark>	No 0
j. New Hires to GS-15(PWD)	<mark>Yes 0</mark>	No 0
k. New Hires to GS-14 (PWD)	Yes 0	No 0
I. New Hires to GS-13(PWD)	<mark>Yes 0</mark>	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

 Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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)	<mark>Yes 0</mark>	No 0
b.	New Hires o GS-15 (PWTD)	<mark>Yes 0</mark>	No 0
c.	New Hires to GS-14(PWTD)	Yes 0	No 0
d.	New Hires to GS-13 (PWTD)	<mark>Yes 0</mark>	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 <u>PWD</u> 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 <u>PWTD</u> 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)	<mark>Yes 0</mark>	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)	<mark>Yes 0</mark>	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 <u>PWD</u> 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)	<mark>Yes 0</mark>	No 0
b.	New Hires for Managers (PWD)	Yes 0	No 0
C.	New Hires for Supervisors (PWD)	<mark>Yes 0</mark>	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 <u>PWTD</u> 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)	<mark>Yes 0</mark>	No 0
b.	New Hires for Managers (PWTD)	Yes 0	No 0
C.	New Hires for Supervisors (PWTD)	<mark>Yes 0</mark>	No 0

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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

 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 <mark>N/A</mark>	0
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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 <u>PWD</u> among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

<ul> <li>a. Voluntary Separations (PWD)</li> </ul>	Yes 0	No 0
<ul> <li>Involuntary Separations (PWD)</li> </ul>	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 <u>PWTD</u> among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

Voluntary Separations (PWTD)	<mark>Yes 0</mark>	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 <u>https://www.ncua.gov/accessibility-</u>

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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 <u>https://www.ncua.gov/accessibility-statement</u> to include notice of employees' and applicants' rights under the Architectural Barriers Act, and included a description of how to file a complaint.

 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. <u>PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN</u> <u>THE WORKPLACE</u>

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

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(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: <u>https://www.ncua.gov/about/diversity-inclusion/workplace-resolutions/pas-fact-sheet</u>. 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 <mark>N/A 0</mark>

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?			Barrier(s) Identified? (Yes or No)			
No			No			
Sources of Data Sources (Yes or No)			Identify Information Collected			
Workforce Data Tables Yes		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 4<sup>th</sup> 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