



NCUA

National Credit Union Administration

Management Directive 715 (MD-715) Federal Agency Annual EEO Program Status Report

Fiscal Year 2018





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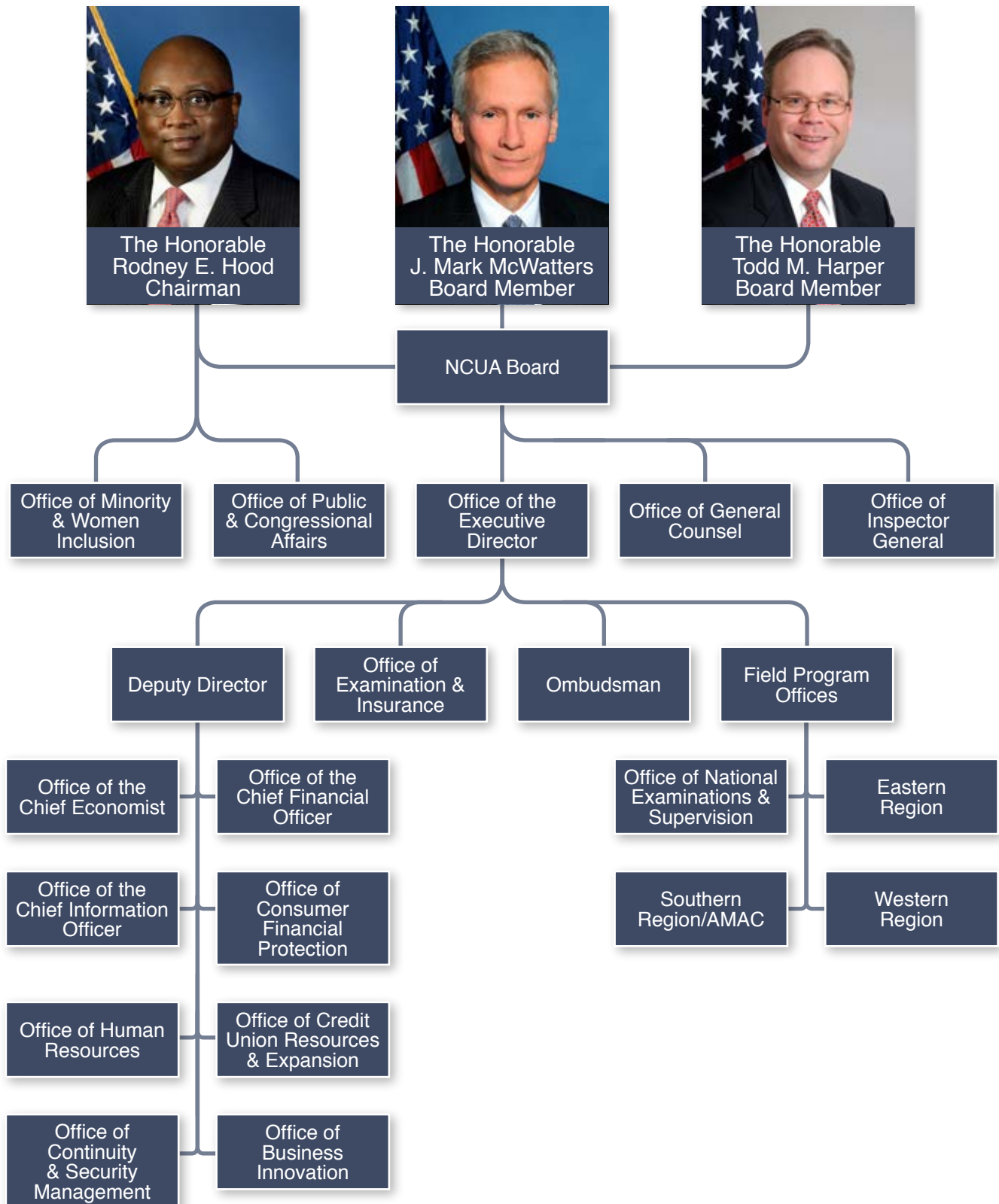
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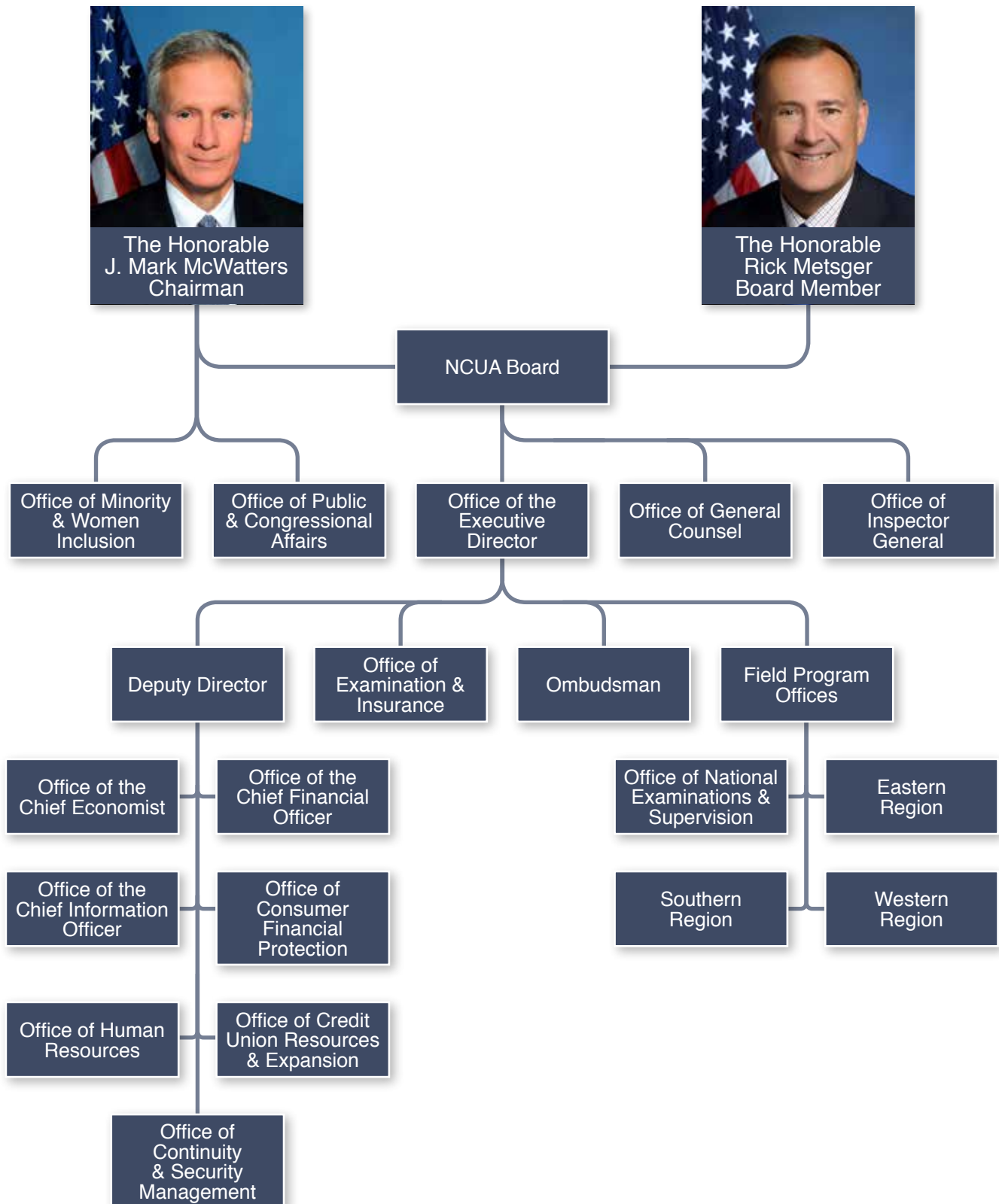


National Credit Union Administration Organizational Chart





National Credit Union Administration Organizational Chart



Tab 2



National Credit Union Administration

Office of the Chairman

Annual Equal Employment Opportunity Policy Statement

August, 2018

The National Credit Union Administration supports and promotes the principles of Equal Employment Opportunity (EEO) in the workforce, where each employee is treated fairly and with dignity and respect. The agency prohibits discrimination on the basis of race, color, religion, national origin, sex (including sexual harassment, sexual orientation, pregnancy, and gender identity), age (40 years and over), mental and physical disability, genetic information, and retaliation for prior involvement in protected EEO activity. The NCUA also prohibits discrimination based on political affiliation, parental and marital status, military service, or any other non-merit based factor.

These protections apply to all employees, applicants for employment and former employees; and extend to all agency employment programs, management practices and decisions, including recruitment, hiring practices, appraisals, promotions, training, and career development programs.

As a federal agency, the NCUA is responsible for promoting and practicing workplace fairness and maintaining a workplace free of retaliation and harassment. The NCUA prohibits and has a zero tolerance for both sexual and non-sexual harassment. Managers and supervisors must continue to monitor the work environment and ensure it is free of unlawful employment practices. Managers and supervisors are required to take swift action when unlawful practices are identified. In addition to federal laws, the NCUA complies with applicable state and local laws governing nondiscrimination in employment in every location in which we operate.

The NCUA protects the rights and freedom of individuals who exercise their rights under EEO antidiscrimination statutes. Employees who are subjected to unlawful practices must be able to use any of the agency's dispute resolution processes and seek redress in an atmosphere free of retaliation.

All NCUA employees are responsible for implementing the agency's EEO policies and [instructions](#) in their daily conduct and activities, and for abiding by the letter, intent, and spirit of the equal opportunity laws and policies.

This statement reaffirms the principles of equal employment opportunity, which enhance the agency's ability to accomplish its mission. I am committed to making the NCUA a workplace of choice where employees are valued, respected, and included.

A handwritten signature in black ink, reading "J. Mark McWatters".

J. Mark McWatters
Chairman



Office of the Chairman

Annual Diversity and Inclusion Statement

September 2018

The NCUA seeks to reflect the broad diversity of the American population. We value the unique set of talents, skills, experiences, and perspectives each employee contributes toward the NCUA's mission. Further, we strive to maintain an inclusive environment where each person feels respected for who they are and what they contribute.

In addition to bringing value to our workforce and workplaces, we understand that diversity and inclusion contribute to our success in other ways. The NCUA emphasizes diversity in our business activities and seeks out vendors and suppliers who represent America's diversity. We place importance on our efforts to preserve and protect minority-serving institutions as they meet a critical need for many of our most underserved populations. This emphasis also extends to our efforts to assess the diversity policies and practices of all credit unions.

The NCUA's goals, as stated in the [2018-2022 Diversity and Inclusion Strategic Plan](#), help to ensure diversity and inclusion are valued throughout the agency. Each employee, at all levels within the agency, has an active role in implementing the strategies for diversity and inclusion. We hold our management officials at all levels responsible and accountable for practicing inclusive behaviors and upholding diversity and inclusion as core values. As the NCUA Chairman, I affirm this agency's commitment to the diversity of this agency and creating an inclusive culture where our differences are valued.

A handwritten signature in black ink, reading "J. Mark McWatters".

J. Mark McWatters
Chairman

Tab 3

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		

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	1101	09	1110

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	Mark Treichel	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)	Carmen Reynolds	Equal Employment Opportunity Specialist	0260	CU-11	703-518-6329	CReynolds@ncua.gov
Women's Program Manager (SEPM)	Carmen Reynolds	Equal Employment Opportunity Specialist	0260	N/A	N/A	CReynolds@ncua.gov
Disability Program Manager (SEPM)	Carmen Reynolds	Equal Employment Opportunity Specialist	0260	N/A	N/A	CReynolds@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	Carmen Reynolds	Equal Employment Opportunity Specialist	0260	CU – 11	703-518-6329	CReynolds@ncua.gov
Compliance Manager	Monica Davy	OMWI Director	0301	SSP	703-518-1651	MDavy@ncua.gov
Principal MD-715 Preparer	Scot Evans	Diversity Outreach Program Analyst	0301	CU – 14	703-518-1624	SEvans@ncua.gov
Other EEO Staff	Gladymar Rivera	Equal Employment Opportunity Specialist	0260	CU – 9	703-518-6328	GVirella@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	

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Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
EEO Policy Statement	Yes	
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	No	By FY2020
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	
Diversity and Inclusion Plan under Executive Order 13583	Yes	
Diversity Policy Statement	Yes	
Human Capital Strategic Plan	Yes	
EEO Strategic Plan	Yes	Incorporated in the NCUA Diversity and Inclusion Plan
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	No	

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.

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Part E.1 - Executive Summary: Mission

The NCUA is an independent federal agency under the Executive Branch of the United States government. It charters, supervises, and insures federal credit unions and administers the National Credit Union Share Insurance Fund for federal and state 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. The NCUA does not receive federal funding. It is fully funded by operating fees charged to federal credit unions and interest earned through investments of the National Credit Union Share Insurance Fund.

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

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Part E.3 - Executive Summary: Workforce Analyses

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Part E.4 - Executive Summary: Accomplishments

Accomplishments

For the NCUA, 2018 was a year of significant internal transition due to an ongoing organizational realignment. During this time, the NCUA made progress toward greater diversity in its workforce and increased inclusiveness within its workplaces. Highlights of these efforts include the following programs, initiatives, and activities:

Leadership Development

Twenty-six employees participated in NCUA-led or sponsored leadership development programs in 2018. The programs provide employees with training and growth opportunities. As illustrated in the below chart, employees in these programs represented many diverse groups. Eight participants, or 31 percent, were from minority groups. Twelve, or 46 percent, were women. Overall, gender, racial, and ethnic representation aligns with 2018 agency-wide workforce representation.

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Leadership Development Programs								
Program	Number	Women	Men	White	African American	Asian	Hispanic	Multiracial
Aspiring Leader	1	1	0	0	0	0	1	0
Excellence in Government	0	0	0	0	0	0	0	0
Executive Coaching	9	5	4	7	1	0	0	1
Executive Leadership	4	1	3	2	2	0	0	0
Management Development	8	1	7	6	1	0	0	1
NCUA Executive Training	3	3	0	3	0	0	0	0
New Leader	1	1	0	0	1	0	0	0
Total	26	12	14	18	15	0	1	2

Mentoring Program: The NCUA created its mentor program in 2016 to provide developmental opportunities, build cross-cultural understanding, and cultivate greater inclusion of all employees. The year-long program served 18 mentoring pairs in its second full year. In May 2018, the program launched its third year with a class of 26 mentoring pairs.

Recruitment and Outreach

The NCUA continues to conduct recruitment and outreach to increase awareness of potential employment opportunities among diverse pools of talent. The majority 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).

To attract diverse and highly talented applicants who qualify specifically for the credit union examiner series (0580) — the agency's main occupational category — the NCUA participated in national recruitment events sponsored by the National Black MBA Association and Prospanica.

Internship Program: Since 2010, the Office of Minority and Women Inclusion has provided college students with opportunities to gain career experience while completing their undergraduate and graduate studies. In 2018, the agency hosted 15 interns selected from organizations that serve groups historically underrepresented in the federal government. These organizations include:

- Hispanic Access Foundation;
- Hispanic Association of Colleges and Universities;
- INROADS;

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- Minority Access;
- The Washington Center; and
- Thurgood Marshall College Fund.

Students participating in the program represented colleges and universities from seven states, Puerto Rico and the District of Columbia. The agency extended a number of internships well beyond the initial summer timeframe, providing additional experience for student participants.

Alternative Recruitment Tools: The NCUA uses a number of alternative tools to expand the NCUA's reach to diverse pools of talent. These include:

- Subscribing to DiversityJobs.com, which gives the agency access to the largest Hispanic and Latino talent database in America with over 250,000 active members and unlimited job postings;
- Using LinkedIn Recruiter, which helps the NCUA narrow search criteria to targeted groups, track candidates based on previous user history, and increase applicant engagement;
- Using USAJobs resume mining tool to search for applicants associated with diverse organizations;
- Maintaining a database of applicants who apply for positions using the Schedule A hiring authority;
- Distributing vacancy announcements through mass marketing software to more than 550 organizations, many of which have specific, targeted audiences, like:
 - AllBilingualJobs.com,
 - AllHispanicJobs.com,
 - LatinoJobs.org, and
 - LatPro.com; and
- Placing general recruitment advertisements and articles featuring the NCUA in publications with diverse audiences, such as:
 - *Black EOE Journal*,
 - *DIVERSEability Magazine*,
 - *Hispanic Network Magazine*,
 - *Professional Woman's Magazine*, and
 - *U.S. Veterans Magazine*.

Inclusive Work Environment

The NCUA is committed to creating an inclusive work environment, as stated in the agency's [*2018–2022 Strategic Plan*](#):

**GOAL 3.1: ATTRACT, ENGAGE, AND RETAIN A HIGHLY SKILLED, DIVERSE
WORKFORCE AND CULTIVATE AN INCLUSIVE WORK ENVIRONMENT.**

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Inclusion is measured using the Office of Personnel Management's Inclusion Index, which is a score calculated from a subset of questions from the Federal Employee Viewpoint Survey. In 2018, the NCUA's overall index score was 63 while the government-wide score was 61. The NCUA scored higher than the government average on 80 percent of the questions and scored particularly high in the fair, open, and supportive categories included in the index.

Employee Resource Groups: The NCUA established a new employee resource group program in December 2017. In 2018, the agency launched three new groups, which will contribute to creating a more inclusive work environment for employees. The new groups established charters, recruited members and leadership, selected executive sponsors, and set goals for the group's work. In addition to these three approved groups, two additional groups are in the formative stage and will launch in early 2019. The NCUA's three employee resource groups include:

- **CULTURA (Creating Unity, Learning to Understand, Recognizing All):** This group's name is also their mission. They are working to develop and retain Hispanic and Latino talent and build greater cultural awareness among the NCUA's workforce.
- **NCUA Pride (People Recognizing Individual Differences Equally):** NCUA PRIDE's mission is to promote and support an accepting environment, and provide assistance to achieve and celebrate full inclusion of all employees; and promote understanding and awareness of the benefits diversity brings to build and sustain a strong and thriving workforce.
- **UMOJA (Unity):** Recognizing a common African ancestry, UMOJA embraces the principle of unity through connectivity and community by intentionally including all employees desiring to increase awareness and respect for differences, pursue opportunities for innovation and change, and align with others to build and sustain a thriving workforce.

Special Emphasis Programs: The NCUA's Special Emphasis Program is a significant component of efforts to build inclusion and understanding within the agency's workplaces. For each of the eight programs, the OMWI office hosts an event featuring guest speakers who provide a range of experience and insight into how to be more intentionally inclusive of each special population. These events are very well attended, both in person and virtually. The following list includes details of each event:

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Special Emphasis Program Events		
Special Emphasis Observance	Event	Speaker
National African American History Month	Engaging in Bold, Inclusive Conversations	Mary-Francis Winters, diversity expert
National Women's History Month	GenderSpeak Workshop	Tammy Hughes, gender communication expert
National Asian/Pacific Islander Heritage Month	Myth of the Model Minority: Asian Americans Facing Racism	Rosalind Chou, sociology professor and author
LGBT Pride Month	Finding Similarities in Our Differences	Ryan Sallans, transgender speaker and author
National Hispanic Heritage Month	The Growing Impact of the Latino Community in the United States	Dr. Robert Rodriguez, diversity expert
National Disability Employment Awareness Month	America's Workforce: Empowering All	Billy W. Wright, federal employee
National American Indian/ Alaska Native Heritage Month	A Tribute to Virginia Indians	Frances Broadbudd Crutchfield, Native American advocate and author
Veterans Day	Diversity and Inclusion the Submarine Way	John Vincent Gregory, diversity expert and author

OMWI Talks: Each month, the Office of Minority and Women Inclusion hosts a semi-facilitated open discussion for NCUA employees. These OMWI Talks aim to create a safe space for employees to discuss sensitive diversity and inclusion related topics. By having conversations about our differences, we can broaden our awareness and understanding of others, leverage our 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.

The office hosts the OMWI Talks in the Central Office and posts resources for hosting local OMWI Talks for field employees. In 2018, field employees had the opportunity to experience OMWI Talks during an agency-wide training event in May 2018. These were extremely well attended and significantly increased the reach of this program.

During 2018, the OMWI Talks featured the following topics:

- Sexual Harassment (March);
- Inclusion (April, May);
- Gender (May);
- Age (January, November);
- Race (February, May);
- Culture (July, October);
- Allies (September); and
- Appearance (December).

Reorganization Transition Liaison Program: Due to a major reorganization of the NCUA, a large number of employee reassignments and relocations occurred in 2018. To ease the transition and help ensure the full inclusion of reassigned staff into their new offices and regions, the Office of Minority and Women Inclusion established the Reorganization Transition Liaison Program. This program matched reassigned staff members with a liaison from their new team. The liaisons served as points-of-contact to answer questions and provide transitioning staff with insight on things like operating procedures, culture of the new office or

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region, and geographic information the reassigned employee needed upon relocating to their new home. This program built on the agency's inclusiveness to ensure the effective implementation of the reorganization.

Diversity Advisory Council: The council is a sub-committee of the agency's Talent Management Council. The council met on a quarterly basis to provide advice and recommendations to senior leadership on areas related to the fair inclusion of all groups in the agency's workforce. The council was also instrumental in drafting the diversity and inclusion strategic plan and in consulting on new initiatives.

Awareness and Education

VIBE: VIBE is an initiative launched in early 2018. The goal of this ongoing campaign is to improve the agency's culture by making a conscious, deliberate effort to adopt inclusive behaviors and habits. We seek to achieve this goal by focusing on a few specific behaviors that help create a greater sense of belonging among the agency's employees. These four behaviors are:

- **V**alue Differences
- **I**ntentionally Include
- **B**reak Biases
- **E**mbrace Change

This initiative includes components that educate the NCUA staff, build cross-cultural awareness, influence positive perceptions and understanding, and lead to inclusive habits. In 2018, this campaign included multiple events to engage employees in learning about inclusive behaviors. During the VIBE launch event, employees learned about the four behaviors through interactive activities and demonstrations. In December 2018, a "VIBE Celebrates" event featured diverse NCUA employees sharing their customs and traditions for some of the various national, regional, cultural, secular, and religious observances they celebrate. Each month, the campaign also highlighted some of the ways employees and offices "VIBE" in their work by putting inclusive behaviors into practice.

Policy Statements: Chairman McWatters issued new policy statements to all NCUA employees confirming his commitment to equal employment opportunity and to diversity and inclusion.

Training: OMWI continued a multi-year effort to provide face-to-face training opportunities in small settings. The goal of these trainings is to improve employee knowledge and understanding of the value of diversity and inclusion as it relates to that group or office's specific work and area of responsibility.

In 2018, the office conducted trainings for the following groups:

- All supervisors in various regional field offices,

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- New managers in the agency's New Supervisor Orientation program,
- All employees within the agency's Office of Consumer Financial Protection,
- Examiners in attendance at the agency's Exam Issues Forum, and
- Examiners at multi-group meetings.

These trainings were tailored to provide the respective audiences with relevant information and practices to their specific roles and responsibilities.

Additionally, diversity and inclusion training was added to all employees' learning plans through the NCUA's online learning management system. The three modules included in the training were Promoting Diversity and Avoiding Discrimination, Unconscious Bias, and Understanding Workplace Diversity. The agency achieved a completion rate of 97.2 percent for the online training.

Diversity and Inclusion Award: The agency granted this new award 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 agency created this award in 2017 and presented it for the first time in 2018.

Part E.5 - Executive Summary: Planned Activities

Tab 4

715-01

PART F

U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**CERTIFICATION of ESTABLISHMENT of CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**I, Monica Davy am the

(Insert name above)

(Insert official title/series/grade above)

Principal EEO

The National Credit Union Administration

Director/Official for

(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.

5/30/2019
Date

Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

5/30/2019
Date

Tab 5

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.

MD-715 - PART G

Agency Self-Assessment Checklist

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	§ 1614.102(b)(7)]			
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	Reasonable Accommodation Policy	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	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	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	The EEO Director reports to a different agency head than the mission-related programmatic offices. The OMWI Director reports to the NCUA Chairman.	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	November 16, 2018	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	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments	
B.4.a	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		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 Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		New
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29			B.4.d

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	CFR § 1614.203(d)(4)(ii)]			
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	An independent factfinder makes the harassment determination	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 and an Office of The Inspector General to handle complaints from non-NCUA employees.	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		New
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	Yes		New

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	procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]			
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	The reasonable accommodation final decisions are made by managers of employees, not by the RA program manager.	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
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 is in draft and is currently undergoing agency review.	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 is in draft and is currently undergoing agency review.	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	Yes		New

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	commitment to agency EEO policies and principles and their participation in the EEO program?			
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.I]	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
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	

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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	The EEO and OHR offices plan to increase the frequency of their meetings from quarterly to monthly. In addition, OMWI and OHR have non-rotating seats on the agency's Diversity Advisory Council where diversity and inclusion related topics are addressed.	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 OHR to ensure full participation by all groups. OMWI routinely assess award data and leadership development programs for triggers and possible barriers.	C.2.a, C.2.b, & C.2.c
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

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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 administration policies covering non-bargaining unit staff and CBA provisions commit to promote a workplace free of discrimination. No table of penalties exist, but disciplinary/adverse actions policies cover taking action against any agency employee/supervisor/manager found to have discriminated.	C.3.a.
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 4 years, so there was no need to discipline or sanction anyone. If someone was found to have discriminated, appropriate discipline/sanctions	C.3.c

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			would definitely have been imposed by the agency.	
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	Annually during the state of the agency and in the annual No FEAR Report to Congress	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
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	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments	
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 utilizes multiple sources for trigger identification. In the future, the agency will also utilize the newly established employee	New

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			resource groups and data from workforce surveys.	
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	OMWI now has a data analyst with barrier analysis and FEVS analysis background to assist in this area. The agency also engages in an annual adverse impact analysis for its mission critical position (examiners) to identify triggers and barriers.	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
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	Yes	In the past, the agency hired an outside vendor to perform an agency barrier analysis. Most	New

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	special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.		recently, the agency partnered with OPM to review its principle examiner testing process. The agency recently hired a data analyst with experience in barrier analysis and FEVS analysis.	
 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	Plans to address barriers are identified in the updated Diversity and Inclusion Plan.	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		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	NCUA 2018-2022 Diversity and Inclusion Strategic Plan.	New
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	Yes		New

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	of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]			
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(I)?	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(I)? 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
E.1.h	When the complainant does not request a hearing, does the agency	Yes		E.3.a.4

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	timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?			
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 performances 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	The Office of General Council is the defensive authority for the agency	New
E.2.b	When seeking legal sufficiency reviews, does the EEO office have	Yes	Another attorney	E.6.a

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	access to sufficient legal resources separate from the agency 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.		within OGC who does not represent the agency in personnel cases.	
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

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 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	
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	The agency resurveyed the workforce in 2017.	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	The agency has doubled it's reasonable accommodation budget due to the growing demand of employees who need accommodations	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?	Yes	The agency has established employee	E.5.g

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	[see MD-715, II(E)] If “yes”, provide an example in the comments.		resource groups to increase employee engagement and to use as resources to help foster a diverse and inclusive workplace aligned with the agency’s mission, values, goals, and objectives.	
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
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	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments	
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.

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 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments 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
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)]	NCUA does not have a personal assistance services instruction in place. The Office of Minority and Women Inclusion is working on a new instruction which is in draft form and is currently undergoing agency review.

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	Finalize a new personal assistance services instruction by the end of fiscal year 2019.	9/30/2019		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Director, Office of Minority and Women Inclusion	Monica Davy	Yes
NCUA Executive Director	Mark Treichel	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)
9/30/2019	Rout instruction through proper NCUA channels for input before final agency approval.	Yes		

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.	NCUA does not have a personal assistance services instruction in place. The Office of Minority and Women Inclusion is working on a new instruction which is in draft form and is currently undergoing agency review. Once the instruction is in place, NCUA will post its procedures on its public website.

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	Once the new Personal Assistance Services instruction is finalized, OMWI will post on NCUA's public website	9/30/2019		

Responsible Official(s)

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

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Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2019	Post the new Personal Assistance Services instruction on NCUA's public website.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments

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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	Table A1	NCUA shows a less than expected participation rate for Hispanic men and women and White women when compared to their labor force benchmarks.

EEO Group(s) Affected by Trigger

EEO Group
All Men
All Women
Hispanic or Latino Males
Hispanic or Latino Females
White Males
White Females
Black or African American Males
Black or African American Females
Asian Males
Asian Females
Native Hawaiian or Other Pacific Islander Males
Native Hawaiian or Other Pacific Islander Females
American Indian or Alaska Native Males

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EEO Group
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)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	The agency reviewed gender information and will further look into gender combined with ethnicity information as data indicate.
Exit Interview Data	Yes	Per OHR, this is a new program as of 2018, thus not enough data to draw concrete conclusions.
Focus Groups	No	
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 Act. NCUA also submits the FEORP and DVAAP reports to OPM.
Other (Please Describe)	Yes	OMWI performs internal analysis using OHR agency information and OMWI database data to perform its internal analysis.

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Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
Because of the past year's hiring freeze and the agency's recent organizational restructure, recruitment efforts over the past two years were significantly limited.

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 agency's Diversity Advisory Council, and the newly established Employee Resource Groups will work closely together on accomplishing the goals set forth in the updated 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)
10/31/2019	Quarterly OHR and OMWI meetings to collaborate on accomplishing goals set forth in the diversity and inclusion strategic plan.		
10/31/2019	Quarterly DAC meetings that will periodically include ERG members and regional and office representation.		

Report of Accomplishments

Fiscal Year	Accomplishments
2018	Reviewing and comparing the last five MD-715 reporting fiscal years-- specifically table A1, notwithstanding the federal hiring freeze and the recent agency reorganization, the agency has experienced some improvement over the last five years in the onboard representation of Hispanic men and women. Although this group continues to experience the lowest participation rate when compared to the CLF, the improvements over the last five years is notable. The improvements are as follows: - The onboard representation of Hispanic men improved from 2.28 percent of the workforce in fiscal year 2014 to 3.15 percent in 2018. This represents an increase of almost 1 percent. - The onboard representation of Hispanic women improved

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	from 2.03 percent of the workforce in fiscal year 2014 to 3.15 percent in 2018. This represents an increase of over 1 percent. NCUA attributes these notable changes to the agency's focus on targeted recruitment outreach, focused diversity awareness and the continually evolving unconscious bias training.
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Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
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Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Diversity in the senior leadership ranks	Table A4	NCUA shows a less than expected participation rate for Women and Minorities in its senior leadership ranks when compared to the CLF benchmark.

EEO Group(s) Affected by Trigger

EEO Group
All Men
All Women
Hispanic or Latino Males
Hispanic or Latino Females
White Males
White Females
Black or African American Males
Black or African American Females
Asian Males
Asian Females
Native Hawaiian or Other Pacific Islander Males
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

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Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Identified areas of underrepresentation
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	The agency reviewed gender information and will further look into gender combined with ethnicity and grade information as data indicate.
Exit Interview Data	Yes	Per OHR, this is a new program as of 2018, thus not enough data to draw concrete conclusions.
Focus Groups	No	
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 Act. NCUA also submits the FEORP and DVAAP reports to OPM.
Other (Please Describe)	Yes	OMWI performs internal analysis using OHR agency information and OMWI database data for its internal analysis.

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

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Description of Policy, Procedure, or Practice
Records show since the agency has been reporting the MD-715, a lack of diversity in the leadership ranks has been present.

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 Talent Management Council will discuss and evaluate strategies to increase leadership diversity. Additionally, the agency's Office of Minority and Women Inclusion, Office of Human Resources, the agency's Diversity Advisory Council, and the newly established Employee Resource Groups will work closely together on accomplishing the goals set forth in the updated NCUA 2018-2022 Diversity and Inclusion Strategic Plan.	1/1/2018	12/30/2022	Yes		

Responsible Official(s)

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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)
10/31/2019	Monthly Talent Management Council Meetings to address strategies to increase leadership diversity.		
10/31/2019	Quarterly OHR and OMWI meetings to collaborate on accomplishing goals set forth in the diversity and inclusion strategic plan.		
10/31/2019	Quarterly DAC meetings that will periodically include ERG members and regional and office representation.		

Report of Accomplishments

Fiscal Year	Accomplishments
2018	Reviewing and comparing the last five MD-715 reporting fiscal years-- specifically table A4, the agency has experienced some improvement over the last five years in the onboard representation of Women and Minorities in the leadership ranks. Although these two groups continue to experience less

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	than expected participation when compared to the CLF, the improvements over the last five years can be seen as positive improvement. The improvements are as follows: - The onboard representation of Women improved from 42.86 percent of the leadership ranks in fiscal year 2014 to 45.83 percent in 2018. This represents an increase of almost 3 percent. - The onboard representation of Minorities improved from 10.71 percent of the leadership ranks in fiscal year 2014 to 12.50 percent in 2018. This represents an increase of almost 2 percent. Because of NCUA's mission, a high percentage of the senior leadership positions are filled with career agency staff. The agency realizes change does not happen quickly, but focusing on diversity awareness and the continually evolving and intentional unconscious bias training provided annually to all NCUA staff will assist hiring manager's check their biases during the hiring process. In theory, as the diversity of the entry level positions increase, more diverse staff move up the leadership ladder, and over time, the diversity of the leadership ranks continue to increase.
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Tab 8

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.

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

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

The NCUA was above the 12 percent benchmark for onboard PWD's at the end of FY2018, this figure was 12.8 percent. PWDs at each of the two grade level clusters at the end of FY2018 were as follows:

21.43 percent of NCUA staff CU-10 and below reported a disability.

12.09 percent of NCUA staff CU-11 and above reported a disability.

EEOC 501 regulations specify that employees not paid under the General Schedule can be compared by salary to those under the General Schedule based on salary cut-offs 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.

18.90 percent of employees paid a total salary at the GS-10 and below level reported a disability.

11.12 percent of employees paid a total salary at the GS-11 and above level reported a disability.

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

a. Cluster GS-1 to GS-10 (PWTD)	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 PWTD's at the end of FY2018, this figure was 3.06 percent. PWTDs at each of the two grade level clusters at the end of FY2018 were as follows:

8.33 percent of NCUA staff CU-10 and below reported a Targeted disability.

2.63 percent of 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 by salary to those under the General Schedule based on salary cut-offs 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.

6.30 percent of employees paid a total salary at the GS-10 and below level reported a Targeted disability.

2.18 percent of employees paid a total salary at the GS-11 and above level reported a Targeted disability.

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

The agency's Office of Minority and Women Inclusion corresponded with all NCUA directors and offices informing managers about the new disability codes. NCUA launched a new HR system which allows staff to update disability information without the need to submit a form.

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.

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

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

Yes 0 No 0

2. Identify all staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and 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
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	1		Nickol Davenport, Website AdminiOffstrator/Section 508 Coordinator, Office of the Chief Information Officer, edavenport@ncua.gov
Architectural Barriers Act Compliance	1			Alejandro Holguin, Facilities Manager,

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				Office of the Chief Financial Officer/Division of Procurement and Facilities Management, aholguin@ncua.gov
Special Emphasis Observances for PWD and PWTD	1			Carmen Reynolds, EEO Specialist, Office of Minority and Women Inclusion, creynolds@ncua.gov

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

Yes 0 No 0

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

Additionally, human resources staff are provided 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

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are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

1. 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.
- Utilizing LinkedIn Recruiter and the USAJOBS Resume Mining tool to significantly expand the outreach footprint to 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 NCUA positions, in addition to the regular competitive recruitment process.

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

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

- Utilizing LinkedIn to improve outreach efforts. 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.
- The Office of Human Resources (OHR) distributes NCUA vacancy announcements to over 550 diverse organizations, colleges and universities. This outreach effort includes veterans' organizations and organizations focused on hiring individuals with disabilities.
- All NCUA vacancy announcements are posted on targeted websites to ensure maximum distribution to a diverse audience, which includes individuals with disabilities.
- The NCUA maintains a talent bank of Schedule A applicants, which includes disabled veterans who apply for positions with the agency.

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- The NCUA uses the USAJobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a disability rating of 30% or more.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The Disability Recruitment Program Manager utilizes a searchable Schedule A candidate database for hiring managers. Specialist 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.

Applying to a vacancy announcement: 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.

Contacting our Schedule A Coordinator: 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). Afterwards, 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).

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

Yes 0

No 0

N/A 0

The agency has a supervisory orientation program (New Supervisor Training) and a resource center for employees that 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.

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The Schedule A job aid tools covers the hiring authority details, and also answers several commonly asked questions. In addition to the supervisory training and resource center tools provided to managers, each 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 over 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 3 PWD (and 0 PWTD) out of a total of 86 permanent new hires. This represents 3.5 percent PWD new hires and 0 percent for PWTD, which suggests a trigger exist for both PWD and PWTD among new hires in the permanent workforce.

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

After a review of table B8 and confirmation from the agency's human resources department, none of the 3 PWD new hires were hired for MCOs. As such 0 percent of the new hires were PWD or PWTD, which suggests a trigger exist for both PWD and PWTD among new hires in the permanent 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 |

Table B6P (relevant applicant pool):

- 12.89 percent for PWDs
- 3.03 percent for PWTDs

Table B7P (Qualified of those identified)

- 3.52 percent for PWDs
- 2.82 percent for PWTDs

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 |

Table B9:

There were 2 qualified applications received for PWTD and 0 selections.

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.

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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 CUEs 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. As a result, 9 individuals with disabilities in this series (as identified on the SF-256) and 19 employees in this series with disabled veteran status were promoted in FY 18.

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

B. CAREER DEVELOPMENT OPPORTUNITIES

1. 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:

The Aspiring Leader Program: a program offered by the Graduate School's Center for Leadership and Management.

The 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.

The Management Development Program: an 18-month developmental program for non-supervisors. Candidates gain experience in defining project scopes, delegating work, developing others, etc.

The 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.

The NCUA Executive Training Program: an 18-month program for senior level supervisors. This program is designed to help prepare employees to transition from supervisory/managerial positions into senior leadership positions within the agency.

The 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 details assignments. The agency also provides career development opportunities through its agency-wide mentorship program.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]

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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	55	50	6	6	1	1
Coaching Programs	9	9	0	0	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	47	24	3	3	0	0

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

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

4. 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

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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 only four time off awards given in 2018. Of those four, one was given to a PWD, another was given to a PWTD, and the remaining two were given to non-disabled staff

Looking at the total cash awards, there were no significant differences between PWD and ND, and the 4/5 rule also did not indicate any differences - therefore, no triggers identified for PWD awards.

There was no significant difference between PWTD and ND likely due to the small size of the PWTD group, even though there is a definite trend visible (79.5% vs. 64.71%; Any Cash Award by category ND, PWD, PWTD as compared to the Current Year Totals on B1, per EEOC guideline for this calculation). When breaking this down to the categories of Cash Awards \$100-500, and \$500 + the numbers were also too small to show a significant difference. Regardless, a difference was identified using the 4/5 rule for the Cash Awards \$500+ category between PWTD and both PWD and ND groups, which appears to be a trigger in this category.

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. Because of the four rating levels incorporated within NCUA's current merit-pay system, trigger identification of pay increases would be outside the boundaries of a barrier analysis, and therefore a N/A response is necessary for both a. and b. above.

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

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D. PROMOTIONS

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

a. SES

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

ii. Internal Selections (PWD)	Yes 0	No 0
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b. Grade GS-15

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

ii. Internal Selections (PWD)	Yes 0	No 0
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c. Grade GS-14

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

ii. Internal Selections (PWD)	Yes 0	No 0
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d. Grade GS-13

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

ii. Internal Selections (PWD)	Yes 0	No 0
-------------------------------	-------	------

For SSP, there was no AFD information available.

For CU-15, table B11's Relevant PWD was 10.37% and Qualified was 10.49%, and there were no selections.

For CU-14, table B11's Relevant PWD was 5.48% and Qualified was 6.81%, and there were no selections.

For CU-13 table B11's Relevant PWD was 13.95% and Qualified was 4.85%, and the selection was 4.35%.

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2. 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.

a. SES

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
---	-------	------

ii. Internal Selections (PWTD)	Yes 0	No 0
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b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
---	-------	------

ii. Internal Selections (PWTD)	Yes 0	No 0
--------------------------------	-------	------

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
---	-------	------

ii. Internal Selections (PWTD)	Yes 0	No 0
--------------------------------	-------	------

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
---	-------	------

ii. Internal Selections (PWTD)	Yes 0	No 0
--------------------------------	-------	------

For SSP, there was no AFD information available.

For CU-15, table B11's Relevant PWTD was 1.24% and Qualified was 5.24%, and there were no selections.

For CU-14, table B11's Relevant PWTD was 1.37% and Qualified was 5.72%, and there were no selections.

For CU-13 table B11's Relevant PWTD was 2.66% and Qualified was 4.85%, and there were no selections.

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

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

There was no AFD for the SSP level.

The below were answer yes for b, c, and d above based on the government's overall goal for PWDs:

There were 28 qualified at the CU-15 level with 0 hires.

There were 25 qualified at the CU-14 level with 0 hires.

There were 23 qualified at the CU-13 level with 1 hire, which is 4.35 percent.

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

- | | | |
|------------------------------|-------|------|
| a. New Hires to SES (PWTD) | Yes 0 | No 0 |
| b. New Hires to 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 |

There was no AFD for the SSP level.

The below were answered yes for b, c, and d above based on the government's overall goal for PWTDs:

There were 14 qualified at the CU-15 level with 0 hires.

There were 21 qualified at the CU-14 level with 0 hires.

There were 11 qualified at the CU-13 level with 0 hires.

5. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal

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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

The Office of Personnel Management provides applicant flow data to the NCUA. OPM does not provide any identifying information, including whether an applicant is a current employee. OPM’s rules of behavior and subsequent direction to the NCUA, in order to protect the integrity of the selection process, prevent the agency from matching demographic information provided by employees to specific job vacancies. It is for this reason, this office is unable to identify whether a position has supervisory status.

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

a. Executives

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

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
---	-------	------

ii. Internal Selections (PWTD)	Yes 0	No 0
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c. Supervisors

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
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ii. Internal Selections (PWTD)	Yes 0	No 0
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7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

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

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

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

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The Office of Personnel Management provides applicant flow data to the NCUA. OPM does not provide any identifying information, including whether an applicant is a current employee. OPM's rules of behavior and subsequent direction to the NCUA, in order to protect the integrity of the selection process, prevent the agency from matching demographic information provided by employees to specific job vacancies. It is for this reason, this office is unable to identify whether a position has supervisory status.

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

NCUA did not have any eligible Schedule A staff for conversion in 2018.

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 2018, there were 115 total separations, 112 voluntary - 82 No Disability, 6 Not Identified, and 24 People with Disabilities (5 PWTD) - and 3 involuntary (2 ND, 1 PWD). Within voluntary separations there was a statistical difference between ND (8.85%) and PWD (16.9%) which is reflected in the total separations (9.06% vs. 17.61%). There were no statistical differences identified within the involuntary

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separations. This analysis indicates a trigger between PWD and ND for voluntary separations.

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

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

There were no statistical differences between PWTD voluntary separations (14.71%) and the ND (8.85%) or PWD (16.9%), likely due to small numbers involved, although this should be watched since it is a similar trend to PWD and likely would be significant if higher numbers were involved. Any interventions on PWD would also apply to PWTD and have positive impact.

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.

In the last 180 days, no respondents identifying with a disability have taken the exit survey.

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.

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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. (Note: The NCUA's reasonable accommodation policy includes Section 508 for accommodation purposes—including filing a complaint, but the policy does not go into details regarding the Section 508 statute.) This is where the accessibility statement lives on NCUA.gov: <https://www.ncua.gov/About/Pages/open-government/accessibility-limited-english-proficiency.aspx>.

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 intends to amend 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, including a description of how to file a complaint. This update will be completed by September 30, 2019.

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.

Description of any programs, policies, or practices that the NCUA has undertaken, or plans to undertake, during the 2018 fiscal year, designed to improve accessibility of agency technology. The first iteration of the Section 508 Policy was recently approved and distributed December of 2017. We can now follow said guidance and enforce accessibility requirements for information technology products/services. OCIO created a Section 508 Resource Center on our internal NCUA Central site here: <http://ncuacentral/ocio/Pages/section508.aspx>. The site offers training resources available to staff and contractors, as well as other resources for meeting and learning about accessibility. There is also a dashboard available within NCUA Central that allows staff to view the progress of improving accessibility for the most utilized sites and applications. The dashboard is available at: <http://ncuacentral/ocio/Pages/Dashboard.aspx>. OCIO has identified, and continues to actively identify, areas that need remediation and/or updating. New NCUA content has to be accessible before it is posted on the public-facing websites. The OCIO works with content owners/creators to remediate deficiencies. Accessibility language has been updated in the Communications Manual, and it has also been included in the soon-to-be published web posting procedures instruction to staff.

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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.

Timely processing of requests; timely providing approved accommodations; 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.

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.

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Managers and supervisors were provided information and guidance on personal assistance services. The OMWI sent a memorandum dated October 17, 2017 directly to all the agency directors, managers, supervisors, and to each individual NCUA office mailbox explaining the new PAS update, as well as the law behind it. The memorandum also included a "Questions and Answers" document from the EEOC.

There have been no requests to date for this service. The reasonable accommodation policy is being updated to incorporate PAS. Once the draft is approved and finalized, the policy will be distributed to all agency personnel.

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.

N/A.

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

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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 findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year.

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, and awards.	
Barrier(s)	Not yet identified	
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

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Complaint Data (Trends)	No	Not		
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	N/A		
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	Yes	In the last 180 days, no respondents identifying with a disability have taken the exit survey.		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes			
Other (Please Describe)	Principal Examiner Test Data	Demographic as well as data regarding attempts and success 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)
12/31/2019	Root cause analysis/ Further adverse impact analysis of PE test	Yes		
Fiscal Year	Accomplishments			
2017	Adverse impact analysis of PE test			

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

The NCUA is working with the Office of Personnel Management to continue the barrier analysis of the Principal Examiner (PE) process. OPM is developing questions to survey recent managers of participants of PE exam

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

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The NCUA utilized services from the Office of Personnel Management (OPM) to evaluate the Principal Examiner (PE) promotional process for adverse impact. The PE test is the process through which NCUA examiners obtains promotions. The results of this test and adverse impact relative to individuals with disabilities were evaluated by agency leadership in its Talent Management Council and plans have been established to evaluate any contributing barriers in the coming year.

The TMC worked with OHR and OPM to develop a survey for examiners and for supervisory examiners. OPM and OHR convened focus groups to define the appropriate questions to determine the successful preparation techniques of the examiners who passed the PE test. The results from the survey will be used to identify best practices and to establish whether certain groups received differing levels of preparation from their supervisory examiners. The survey will be issued in the fall of 2019.

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.

Once the identified planned activities have been completed, the agency will address any needed corrective activity.

Tab 9

Tab 10

Tab 11



NCUA
National Credit Union Administration

Strategic Plan

2018–2022

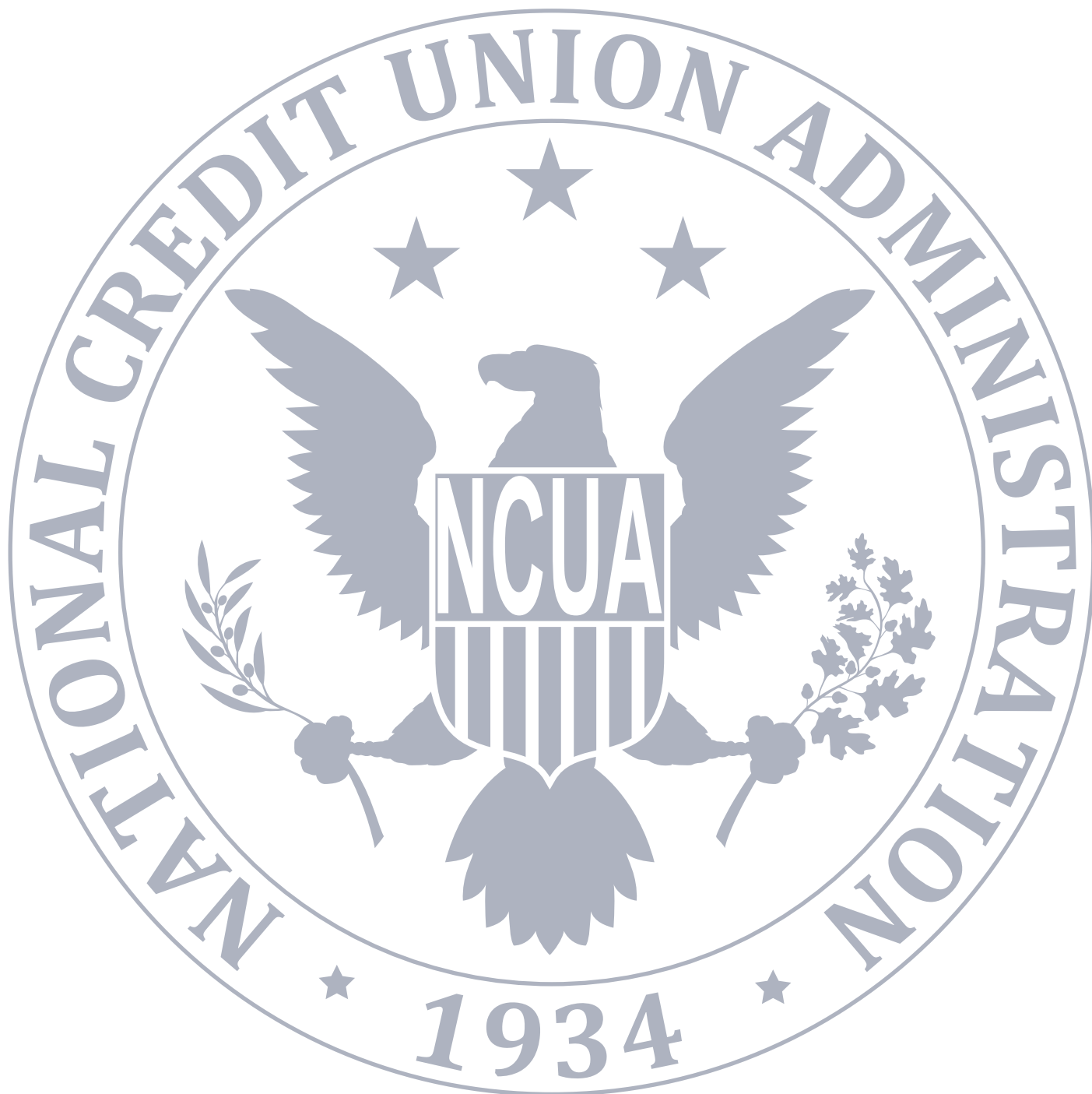


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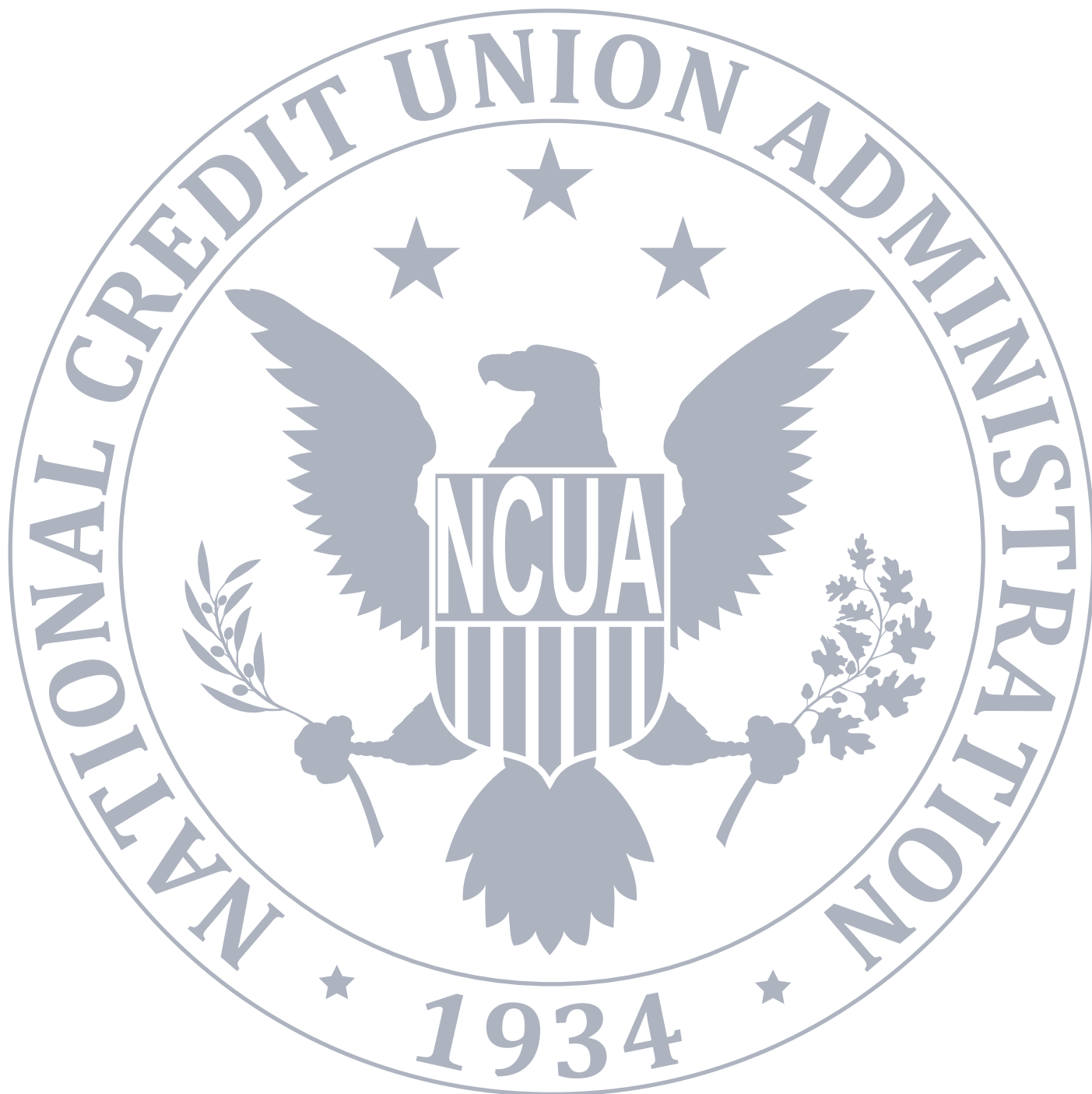
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Message from the Board

The U.S. financial sector is subject to continuing advancements and emerging risks, which necessitate changes in the way the National Credit Union Administration (NCUA) conducts its business so that it continues to effectively supervise and insure a growing and evolving credit union system. Future risks to credit unions include escalating cyber-security threats, interest rate and liquidity challenges, real estate and member business loan concentrations, and rapid changes in technology. Advancements in the type and quantity of data available also demands a fresh way of thinking about our business model. At the same time, the continuing reality of smaller credit unions merging while remaining units grow significantly in size and complexity requires an even more strategic, nimble and innovative way to carry out our responsibilities as established in the Federal Credit Union Act.

In response to the dynamic forces that continue to reshape the industry, the NCUA continues to adapt its approach to its mission. The NCUA initiated several significant reforms over the past two years, and many of these efforts continue in the NCUA Strategic Plan 2018-2022. These reforms include the Examination Flexibility Initiative adopted in 2016, the Agency Reform Plan adopted by the Board in July 2017, the publication of NCUA's Regulatory Reform Agenda in August 2017, closure of the Temporary Corporate Credit Union Stabilization Fund in September 2017, and the ongoing commitment to transparency in how the NCUA conducts its business.

The NCUA Strategic Plan 2018–2022 outlines how the agency will continue to adapt over the next five years. Over the course of this plan, the NCUA Board and program staff will continue to create an environment that allows credit unions to better serve their members while maintaining safety and soundness of the system. NCUA has developed a comprehensive agenda for reviewing and revising NCUA's Regulations. The effort examines all aspects of NCUA's regulations and proposes more significant regulatory relief amendments than have been embraced in the past.

The NCUA will continue to emphasize improving processes, tools, and technology to increase efficiency and effectiveness of its operations. Reliable, up-to-date, and secure data and information is essential to the NCUA's success. Technology facilitates and streamlines our day-to-day work and allows us to collaborate seamlessly and securely, both internally and with other agencies, the credit unions we supervise, and consumers. This Strategic Plan addresses the investment and upgrade of technology software systems. The NCUA will modernize examination systems and all associated applications, refresh needed hardware, such as laptops, and conduct a redesign of the [ncua.gov](http://www.ncua.gov) website.

The changing financial services environment is also driving a need for a greater diversity of NCUA employees' skills and knowledge. NCUA will continue to focus on workforce recruitment and development, to attract, train, and retain the best examiners and specialists. This includes individuals with specialized expertise in capital markets, business lending, investments, information technology, cyber-security, economics, statistics, and other relevant fields. NCUA staff are the agency's most important asset, and must have the skills, training, and tools necessary to do their jobs in this complex and dynamic financial environment.

By publishing the proposed NCUA Strategic Plan 2018–2022 in the Federal Register, as well as posting it on our website at www.ncua.gov, NCUA continues its ongoing commitment to transparency about the agency's priorities, plans and strategy.

The men and women of the NCUA will continue to work diligently to balance the NCUA's mission to ensure safety and soundness of the credit union system and protecting the Share Insurance Fund with the need to allow for innovation so that credit unions continue to deliver critical financial services to their 110 million members. The Strategic Plan 2018-2022 conveys a vision and direction for how the NCUA will to reshape its workforce and its approach to its work; it reflects a fresh way of thinking about how the NCUA's can best meet its mission. The NCUA stands ready to address these challenges head-on to ensure the continued safety and soundness of the credit union system, to the benefit of credit union members across America.



J. Mark McWatters
Chairman
January 25, 2018



Rick Metsger
Board Member
January 25, 2018

Agency Overview

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 NCUA, was created in 1934 with the passage of the Federal Credit Union Act. As the products and services provided to members changed over the years, the NCUA's supervision and regulation evolved as well. In 1970, this evolution included the addition of the NCUSIF providing the backing of the full faith and credit of the U.S. Government to credit union accounts. No credit union member has ever lost a penny of deposits insured by the NCUSIF.

The NCUA is responsible for the regulation and supervision of 5,642 federally insured credit unions with more than 110 million members and more than \$1.3 trillion in assets across all states and U.S. territories.

Mission Statement

Provide, through regulation and supervision, a safe and sound credit union system, which promotes confidence in the national system of cooperative credit.

Vision Statement

Protecting credit unions and the consumers who own them through effective supervision, regulation and insurance.

Values

Integrity

Adhere to the highest ethical and professional standards.

Accountability

Accept responsibilities and meet commitments.

Transparency

Be open, direct and frequent in communications.

Inclusion

Foster a workplace culture that values diverse backgrounds, experiences and perspectives.

Proficiency

Deploy a workforce with a high degree of skill, competence and expertise to maximize performance.

Economic Outlook

The U.S. economic environment is a key determinant of credit union performance. Over the horizon of the Strategic Plan, the consensus forecast for the U.S. economy is for moderate economic growth, an unemployment rate under 5 percent, and annual inflation around 2 percent (the Federal Reserve's target rate). Interest rates are expected to trend higher over the next few years, with short-term rates rising more than longer-term rates.¹ In particular, during 2018-2022:

The consensus forecast predicts real GDP growth will average around 2.2 percent per year. This is similar to the economy's average performance over the past few years and is roughly consistent with current estimates of its long-run potential.

- The unemployment rate is projected to decline further to around 3.8 percent in 2019 and edge steadily higher to a still-low 4.5 percent by 2022. This is roughly consistent with current estimates of the “full employment” unemployment rate.
- Consumer prices are projected to rise a little more than 2 percent annually, consistent with the Federal Reserve's inflation target. Falling oil prices have kept overall inflation low recently; inflation averaged 1.4 percent per year during the past five years. Average core inflation, which is consumer prices excluding food and energy, was closer to 2 percent.
- The 3-month Treasury bill rate is projected to rise from an average of 1.3 percent in December 2017 to 2.8 percent in 2022.
- The 10-year Treasury rate is projected to rise from 2.4 percent in December 2017 to 3.6 percent in 2022.
- The term spread declined from an average of 250 basis points in 2014 to around 150 basis points in 2016 and 2017. The interest rate forecasts imply continuing declines in the term spread to an average of around 80 basis points during the five-year period from 2018-2022.

Interest Rate Risk

The consensus forecast indicates that interest rates are expected to change more than other key economic indicators through 2022. In December 2017, the 10-year Treasury note rate averaged 108 basis points higher than the 3-month Treasury bill rate. Based on the forecasts for these interest rates, the term spread is expected to fall below 100 basis points in 2018. The last time the spread between the 10-year and 3-month Treasury rates was under 100 basis points was in 2007.

Recent trends suggest that credit unions have reduced interest rate risk on the asset side of their balance sheets. Credit unions' aggregate long-term assets share of total assets had risen from an average of 18 percent during 2000-2006 to a peak of 30 percent in 2013Q4. The net long-term assets share has since eased falling to 26 percent

¹ Blue Chip Economic Indicators, “Top Analysts’ Forecasts of the U.S. Economic Outlook for the Year Ahead,” Vol. 42, No. 10, October 10, 2017, and Vol 43, No. 1, January 10, 2018. The Blue Chip consensus forecasts reflect the views of roughly 50 forecasters providing quantitative economic forecasts for five and ten years into the future.

in 2016Q3, although it rose back to 28 percent in 2017Q3.² While the recent decline in aggregate exposure to long-term assets should reduce the risks associated with rising interest rates, the share of long-dated assets to total assets remains elevated relative to the average before the Great Recession.

The trends in credit union deposits are mixed. More than half of credit union deposits in 2017Q3 were in “core” accounts (regular shares and share drafts), the highest share in nearly 20 years and up from 37 percent in 2008Q4. At the same time, the composition of non-core deposits has shifted away from fixed-rate share certificates to variable-rate money market shares. Since money market shares have variable rates, funding these deposits may be more expensive if rates rise quickly.

In a rising rate environment, credit unions may face pressures to raise their deposit rates in order to retain shares, as regular and money market shares may be most sensitive to rates. Members may reallocate their savings to higher-yielding products within the credit union, or transfer their money to competitors offering higher rates. The increased prevalence of web-based and mobile banking may reduce the transition costs consumers face when changing accounts and make them more likely to move their funds even if rates at other institutions are only slightly higher.

If realized, the interest rate environment expected by forecasters could be challenging for some credit unions. If short-term rates rise more than long-term rates, the flatter yield curve could reduce net interest margins.

However, the consensus rate environment might also make it easier for some institutions to distinguish themselves from market competitors, either through lower rates on loans or higher rates on deposits.

While a rising rate environment is predicted by most forecasters, if the U.S. economy’s overall performance is worse than expected, rates may remain low for an extended period of time. A continuation of the current, very low interest rate environment also presents risks to credit unions. Credit unions that rely primarily on investment income may find their net income remaining low or falling. In addition, credit unions could “reach for yield,” by adding long-term and higher-risk assets to their portfolio. Finally, the sluggish economy that would likely be associated with continued low interest rates could raise credit risk for almost all types of private instruments.

Key Risk Areas for U.S. Growth

One major determinant of the likely path for interest rates is the path of economic growth. There is a variety of risks to the economic growth outlook. On the downside, slower growth overseas could restrain economic activity in the U.S. A stronger dollar relative to other foreign currencies or a renewed decline in oil prices could also hamper growth, particularly in manufacturing-intensive and oil-producing states. Slower economic growth would hold down job creation and inflation, and help keep interest rates low. This could dampen deposit and membership growth, reduce credit union loan demand, and lead to increased credit risk. If global economic conditions deteriorated before U.S. monetary policy had completed its adjustment to a more neutral policy position, policymakers would find it difficult to stimulate the domestic economy and the result could be an extended period of sluggish growth, and low inflation and interest rates.

² NCUA, 5300 Call Reports.

Alternatively, more rapid growth in the rest of the world would push U.S. growth higher. This might mean faster employment growth and falling unemployment, but higher inflation and faster interest rate increases. Other upside risks that could lead to faster-than-expected growth include unanticipated strength in consumer spending or a more robust housing recovery. Fiscal policy changes – beyond the just-enacted changes to the federal income tax – that have been discussed by the Administration, include increased infrastructure spending, which could also increase economic growth, if not offset by other policy changes. Stronger economic growth would support credit union lending activity, credit quality, and membership growth. However, with the U.S. economy already near full employment, U.S. inflation would likely rise as well, leading to higher-than-expected interest rates.

In December 2017 the Tax Cuts and Jobs Act was enacted, which made significant changes to the personal and business income tax code starting in 2018. While analysts are still sorting out the potential effects of specific changes on individuals and industries, it appears likely that credit unions and their members will benefit in the near term, mostly through the boost the Act is expected to give to the economy as a whole. Middle-income households are expected to see noticeable tax reductions. The additional income freed up by the tax cuts will likely translate into additional consumer spending and borrowing, increasing consumer loan demand at credit unions. Gains in after-tax income could also lead to improvement in loan quality measures, and boost credit union share balance accounts and credit union membership.

Still, there may be offsetting impacts. Some of the benefits to credit unions could be offset by higher interest rates. If short-term interest rates rise more than currently expected, credit unions would also face higher costs for deposits. Net interest margins could be preserved if rates rise across the maturity spectrum, allowing credit union lending rates also rise, but higher lending rates would offset some of the boost to consumer borrowing from the tax cuts. How much rates increase and whether short-term rates rise more or less than long-term rates will affect credit union net interest margins, growth of net income and net worth. Individual credit unions may be affected by the Act's new tax on compensation above \$1 million at not-for-profit businesses. With some provisions expiring in 2025 and many questions about how some provisions of the new law will be implemented, there is less certainty about the longer-term effects of the new tax law. Some sectors, like housing, may not benefit as much as other sectors, since the mortgage deduction cap on large mortgages has been reduced and the personal deductions for state and local taxes has been capped. In addition, the relatively large tax cuts for banks – reflecting the reduction in the top corporate tax rate from 35 percent to 21 percent and other changes – will improve their competitive position relative to credit unions.

A variety of other factors can also affect U.S. economic growth. It is important to recognize that while the consensus forecast is that the U.S. economy will continue to expand over the Strategic Plan period, a recession is nonetheless possible. A recession would likely lead to increased credit risk at credit unions—members may lose their jobs or see the value of their assets decline. Recessions can be caused by many different factors, and some industries and regions are always affected more than others. For example, depending on the cause of the recession, industries and states that were relatively unaffected by the Great Recession could find themselves bearing the brunt of the next one.

Credit Union System Key Risks

Economic, market, and demographic factors will likely influence how credit unions operate and grow. As these factors evolve over time, credit unions may face new risks and opportunities.

Credit Union Responses to Changing Environment: The economic environment has recently helped generate improving credit union fundamentals. Due to the structure of their portfolios, the decisions credit unions have made in the past few years will continue to affect their performance over the Strategic Plan horizon. Some of these decisions may create challenges as the economic and interest rate environments evolve. In addition, economic conditions can weaken in specific industries and regions, even if the overall economy is growing and generating jobs. Starting in 2014, for example, the sharp decline in oil prices weakened the economies of energy-producing states, such as West Virginia and North Dakota; activity in these states remains subdued compared with activity in 2010 through 2014. Very local factors may also be at work at some credit unions. For example, as the value of taxi medallions in New York and other cities has decreased, credit unions with large exposure to taxi medallion loans faced challenges and two relatively sizable credit unions have been placed in conservatorship.

Financial Landscape and Technology: The spread of communications technology is providing challenges and opportunities for financial institutions. New products are being developed, new ways for consumers to interact with their financial institution are becoming more prevalent, and consumers are able to make and implement financial decisions nearly instantaneously. For example, technology has made it possible for consumers to engage in direct peer-to-peer payment without drawing on the services of a traditional financial institution. To the extent that these new payment systems begin to provide more services, like maintaining deposits and making or brokering loans, the payment systems will pose competitive challenges to credit unions and banks alike. More generally, credit unions are likely to face a range of challenges from financial technology (fintech) companies in the areas of lending and the provision of other services. For example, underwriting and lending may be automated at a cost below levels associated with more traditional financial institutions, but may not be subject to the same regulations and safeguards that credit unions and other traditional financial institutions face. The emergence and the increasing importance of digital currencies predicted by many analysts may pose both risks and opportunities to consumers, credit unions, banks and financial regulators. Finally, credit unions' increasing use of technology is making the credit union system more vulnerable to cyber-attacks. The prevalence of malware, ransomware, distributed denial of service (DDOS) attacks, and other forms of cyber intrusion are causing challenges at credit unions of all sizes, and will require ongoing measures for containment. These trends are likely to continue, and even accelerate, through 2022.

Technological changes outside the financial sector may also have an impact on consumer behavior, which could indirectly affect credit unions. Some observers have noted that the increase in on-demand use of auto services and the potential for pay-as-you-go on-demand vehicle rental, would reduce purchases of consumer-owned vehicles. In turn, that would lead to a slowdown or reduction in the demand for vehicle loans, now slightly more than a third of the credit union system loan portfolio.

Competition and Consolidation: The number of credit unions and banks has been falling steadily for more than two decades. Analysts believe this mainly reflects two causes. First, economies of scale have encouraged mergers, reducing the number of active depository institutions. Second, non-depository institutions are

providing products and services that compete with what credit unions and banks offer. Combined, these trends mean credit unions face increased competition. The emergence of a robust and wide range of non-bank financial companies leveraging technology (fintech) have the potential to become market disruptors for the traditional financial markets and traditional depository institution business model. This is especially true for retail financial services.

Large banks are able to expand their presence beyond their existing branch networks. At the same time, the rise of deposit-like products such as prepaid cards, and alternative lending products such as peer-to-peer lending, have the potential to reduce members' demand for both the savings and lending products credit unions provide. According to NCUA reports, most credit unions that merge today cite "expanded services" for their members as the reason for merging. An increase in competition could lead to more "mergers of equals," a trend that could lead to consolidation among relatively large credit unions.

Aging Credit Union Membership: The U.S. Census Bureau forecasts that the share of the population reaching retirement age in the United States will continue to rise through the Strategic Plan period.³ As the population ages, credit unions may see shifts in growth trends and members' demand for certain products and services. For example, an aging population may increase the demand for savings and interest-bearing accounts, and lower the demand for auto loans and mortgages, but potentially increase the demand for reverse mortgages. Additionally, some credit unions with small fields of membership may find their potential membership declining, restricting their opportunities to grow. Internal credit union management may also be affected. For example, some credit unions rely on a few experienced individuals for management. As these employees reach retirement age, the credit unions may lose considerable institutional knowledge and have few replacement opportunities.

Population Diversity and Trends in Financial Access: The U.S. population is forecast to become more diverse through the Strategic Plan period. According to the FDIC's 2015 *National Survey of Unbanked and Underbanked Households*, more than one out of every four U.S. households is either unbanked (no account at a federally insured depository institution) or underbanked (has an account, but also recently relied on non-bank alternative financial services). With an increased array of financial services being provided by non-bank entities, depository institutions may face further pressures as they try to retain current consumers and reach out to new ones. As the U.S. population becomes more diverse, credit unions may need to adapt the products and services they offer to ensure they can communicate effectively with and serve the needs of potential new members.

The 2015 FDIC survey found that while more than three-quarters of households in the "White non-Black non-Hispanic" group were fully banked, less than half of Black and Hispanic households were fully banked. This division may be partly attributable to language barriers; the FDIC's 2013 survey found that just 38 percent of households that only speak Spanish were fully banked. In credit unions that lack diverse representation among the credit union employees and volunteer board members, additional challenges are created in identifying and providing appropriate services for diverse populations. While diverse populations are growing, the number of credit unions in diverse communities is shrinking. Losing the character and number of minority depository institutions may result in even greater challenges to reaching unbanked and underbanked populations.

Generational Shift in Consumer Preferences: Over the Strategic Plan period, today's millennial generation is a key source of potential members for many credit unions. Some analysts believe that millennials' approach to

³ U.S. Census Bureau, "An Aging Nation: The Older Population in the United States," Ortman et. al., May 2014

personal finances differs from those of previous generations in key ways and these differences will persist as they age. These analysts suggest that, for example, millennials may be less interested in ownership of big-ticket items like houses and vehicles. If true, this may undermine credit unions' current business models, which tend to be dominated by loans secured by these assets. New types of loans, new types of deposit accounts, and new types of member services may be required to meet millennials' needs. However, other analysts believe that the millennials spending patterns reflect the relatively poor economic conditions that affected their employment and wage opportunities. They argue that, as the economy improves, millennial spending patterns may become more like previous generations. In that event, credit unions may be facing a surge in demand for loans to make big-ticket purchases.

Additionally, some analysts anticipate that millennials' familiarity with technology will make them less attached to conducting business at physical branches. The FDIC's 2015 *National Survey of Unbanked and Underbanked Households* found that roughly a third of households use a bank teller as their main banking method. This varied markedly by age group, though: about one in six households younger than 45 said their main banking method was a bank teller, while almost half of households older than 65 relied mostly on bank tellers. At the same time, less than 8 percent of households 45 or older rely primarily on mobile banking, compared to 25 percent of households between 15 and 24. If, over time, consumers conduct more of their business through electronic and mobile services, credit unions may need to find alternatives to the branch-based, in-person interactions with members that they are traditionally known for, in order to remain competitive.

Major Agency Programs

The NCUA employs a central office, an Asset Management and Assistance Center (AMAC) to liquidate credit unions and recover assets, and regional offices to perform all the tasks in the agency's major program areas and support functions.

Supervision

The supervision program contributes to the safety and soundness of the credit union system. A program priority includes identifying and resolving risk concerns such as interest rate risk, liquidity risk, credit risk, concentration risk, and operational risks including cyber-security and reputation risk. The NCUA supervises federally insured credit unions through examinations and regulatory enforcement including providing guidance through various publications, taking administrative actions and conserving or liquidating severely troubled institutions as necessary to manage risk.

Insurance

The NCUA manages the \$16 billion NCUSIF, which provides insurance to at least \$250,000 for deposits held at federally insured credit unions. The fund is capitalized by credit unions and through retained earnings. The NCUA manages the fund to the Board approved normal operating level.

Credit Union Development

Through training, partnerships and resource assistance, the NCUA fosters credit union development, particularly the expansion of services to eligible members provided by small, minority, and newly chartered and low-income designated credit unions. One source of assistance is the Community Development Revolving Loan Fund, which provides loans and technical assistance grants to credit unions serving low-income members. This support results in improved access to financial services, an opportunity for increased member savings, and improved employment opportunities in low-income communities. The NCUA charts new federal credit unions, as well as approves modifications to existing charters and fields of membership.

Consumer Financial Protection

The NCUA protects consumers' rights through effective enforcement of federal consumer financial protection laws, regulations, and requirements. The NCUA also develops and promotes financial education programs for credit unions to assist members in making smarter financial decisions.

Asset Management

The NCUA conducts credit union liquidations and performs management and recovery of assets through the Asset Management and Assistance Center (AMAC). AMAC effectively manages and disposes of assets acquired from liquidations. AMAC also assists the NCUA regional offices with reviews of large, complex loan portfolios and actual or potential bond claims. It also participates in the operational phases of conservatorships and

records reconstruction. The purpose of AMAC is to minimize credit union failure costs to the NCUSIF and credit union members and creditors.

Stakeholder Outreach

In order to clearly understand the needs of the credit union system, the NCUA seeks input from all of its stakeholders, including Congress, State Supervisory Authorities, credit union members, credit unions and their associations. Input is sought through the examination and supervision process, surveys, public webinars, working groups, rulemakings, and public and congressional dialogue. The views and input are assessed and properly considered during the developmental process. For this plan, this collective input may directly or indirectly influence the goals or objectives, the selection of measures of success, and the performance targets.

Cross-Agency Collaboration

The NCUA is involved in numerous cross-agency initiatives by collaborating with the other financial regulatory agencies through participation in several councils. Significant councils include the Financial Stability Oversight Council (FSOC), the Federal Financial Institutions Examination Council (FFIEC), the Financial and Banking Information Infrastructure Committee (FBIIC.) These councils and their many associated taskforces and working groups contribute to the success of the NCUA's mission.

Strategic Goals and Objectives

The chart below summarizes the NCUA's strategic goals and objectives for 2018–2022. The objectives support and complement the strategic goals. Each strategic objective has performance goals with measurable indicators and targets.

Strategic Goals	Strategic Objectives
Goal 1: Ensure a safe and sound credit union system	1.1 Maintain a strong Share Insurance Fund. 1.2 Provide high-quality and efficient supervision.
Goal 2: Provide a regulatory framework that is transparent, efficient and improves consumer access	2.1 Deliver an effective and transparent regulatory framework. 2.2 Enforce federal consumer financial protection laws and regulations in federal credit unions. 2.3 Facilitate access to federally-insured credit union financial services.
Goal 3: Maximize organizational performance to enable mission success	3.1 Attract, engage and retain a highly-skilled, diverse workforce and cultivate an inclusive environment. 3.2 Deliver an efficient organizational design supported by improved business processes and innovation. 3.3 Ensure sound corporate governance.

Strategic Goal 1

Ensure a safe and sound credit union system.

Strategic Goal Overview

The NCUA's primary function is to identify credit union system risks, determine the magnitude, and mitigate unacceptable levels through the examination and supervision program. The primary risks include interest rate risk, credit risk and operational risks, in particular cyber-security and fraud. The NCUA addresses emerging issues in order to minimize losses to the NCUSIF.

Performance Goals

The performance goals below will be pursued as a means to achieve our strategic goals and objectives. The performance goals, related measures and targets, are provided in the NCUA's Annual Performance Plan.

Strategic Objectives	
1.1 Maintain a strong Share Insurance Fund.	- Fully and efficiently execute the requirements of the agency's examination and supervision program. - Effectively manage losses to the NCUSIF.
1.2 Provide high-quality and efficient supervision.	- Enable continuous risk analysis, identify key trends and target examinations where most needed. - Effectively identify and evaluate risk in complex credit union portfolios. - Improve the quality control and consistency of examinations.

Strategies

- Implement a flexible exam schedule that extends examination cycles up to 20 months; reducing the agency's presence in well-capitalized and well-managed credit unions and enabling resources to be focused towards higher risk credit unions.
- Develop a data-driven supervision model to assess and monitor risk in large and complex credit unions.
- Advance data analytics and remote monitoring capabilities to allow field staff more flexibility with completing exam procedures offsite; reducing our current footprint in credit unions.
- Study virtual examination procedures and leverage current and emerging technology to advance the examination, improve efficiency and reduce costs.

- Improve the quality of examination reports through enhanced quality review processes.
- Enhance training for specialized examiners.
- Review and update training plans to ensure examiner curriculum is current and reflects industry changes.
- Improve our capabilities to timely identify and detect fraudulent activity.
- Work with state regulators to strengthen and enhance the shared examination and supervision of federally insured, state-chartered credit unions.
- Strengthen cybersecurity through embedding knowledge and tools that will advance industry accepted practices in the credit union system.
- Study approaches to anonymize and share information with credit unions on threats and vulnerabilities to the financial sector.
- Improve internal systems and processes to ensure capabilities are in place to conduct conservatorships and liquidations of increasingly complex credit unions.
- Promptly pay members' confirmed insured shares upon involuntary liquidation of a credit union.
- Develop and implement training for credit unions on cyber threats, continuity of operations, and security issues.

External Factors

- Changes in economic conditions that cause credit unions to experience unusual financial stresses, including changes in the labor market and the interest rate environment.
- Increasing complexity of credit union products and services.
- Physical or financial damage to credit unions caused by natural hazards such as earthquakes, floods, hurricanes, droughts and cyclones.
- Changes in consumer preferences for products and services currently offered by credit unions.
- Consolidation across the financial services industry that leads to reduced services in diverse communities, greater challenges in reaching unbanked and underbanked populations.
- Increasingly sophisticated cyber-attacks that threaten consumers, credit unions, confidence in the credit union system and national economic security.
- Increasing competitive pressures from other financial service providers, including non-depository institutions and financial technology companies (fintech).
- Changes to credit union operations that affect balance sheet structure, credit risk, and concentration risk, including increasing reliance on third-party vendors.
- Changes in standards and practices adopted by other regulatory agencies that could affect credit unions.
- Changes in Federal and State laws.

Strategic Goal 2

Provide a regulatory framework that is transparent, efficient and improves consumer access.

Strategic Goal Overview

Strategic Goal 2 strives to effectively manage the balance between regulatory flexibility and responsible oversight. The NCUA's goal is to issue balanced, clear, and straightforward regulations while addressing emerging adverse trends in a timely manner. The goal also seeks to improve consumer access and ensure consumer compliance, financial protection and consumer education.

Performance Goals

The performance goals below will be pursued as a means to achieve our strategic goals and objectives. The performance goals, related measures and targets, are provided in the NCUA's Annual Performance Plan.

Strategic Objectives	
2.1 Deliver an effective and transparent regulatory framework.	• Promulgate efficient, targeted regulation tailored to offer meaningful relief without undermining safety and soundness. • Increase awareness of regulatory activities.
2.2 Enforce federal consumer financial protection laws and regulations in federal credit unions.	• Assess compliance with consumer lending and deposit laws and regulations. • Empower consumers with information to make independent and informed financial decisions.
2.3 Facilitate access to federally-insured credit union financial services.	• Efficiently administer viable credit union charters and expansion requests. • Support small, low-income, minority and newly chartered credit unions.

Strategies

- Identify financial services industry risks and marketplace developments that may prompt regulatory changes.
- Increase the usability of contemporary information on MyCreditUnion.gov.
- Enhance the due process rights of credit unions that elect to appeal an administrative action by the NCUA.
- Work closely with other agencies, and standard setting boards to help ensure that the cooperative, not-for-profit attributes of the credit union community are considered in their rules, guidance, and enforcement actions.

- Identify additional opportunities for regulatory reform.
- Collaborate with other federal regulatory agencies and state regulators as appropriate to maintain a safe and sound regulatory environment.
- Enforce federal consumer financial protection laws.
- Perform fair lending examinations and offsite fair lending supervision contacts.
- Educate credit unions and consumers about federal consumer financial protection issues.
- Assist consumers in resolving disputes with credit unions and monitor consumer complaints to guide consumer compliance program development.
- Support credit unions in their efforts to offer essential products and services, including financial education programs to all eligible members.
- Promote the value of diversity and inclusive financial services in credit unions.
- Deliver effective regulations through the regulatory reform agenda.
- Provide sufficient comment periods when introducing new or revised regulations and consider public comments when finalizing regulations.
- Support the success of small credit unions through online training, grants and loans, partnership opportunities and resources.
- Issue information on new and changed regulations through multiple delivery channels.
- Engage congressional committees on priority issues.
- Enhance communication with consumers and credit unions on chartering, field of membership requests and consumer complaints.

External Factors

- Changes in economic conditions that cause credit unions to experience unusual financial stresses, including changes in the labor market and the interest rate environment.
- Changes in standards and practices adopted by other regulatory agencies that could affect credit unions.
- Changes in credit union membership growth or fields of membership.
- Changes in how the public views the benefits of credit union membership.
- Shifts in member needs associated with the changing demographics of membership.
- Credit union consolidation trends that increase the size of the typical credit union.
- Changes in the scope and complexity of products and services credit unions offer.
- Competitive pressures from other financial service providers, including non-depository institutions.
- Changes in standards and practices adopted by other regulatory agencies that could affect credit unions.
- Increased cyber-attacks against both credit unions and federal and state regulators.
- Changes in Federal and State laws.

Strategic Goal 3

Maximize organizational performance to enable mission success.

Strategic Goal Overview

The NCUA's most important resource is high quality, skilled staff. To maximize their contributions to the mission, they must be supported by efficient and effective processes, tools, and modern technology.

Performance Goals

The performance goals below will be pursued as a means to achieve our strategic goals and objectives. The performance goals, related measures and targets, are provided in the NCUA's Annual Performance Plan.

Strategic Objectives	
3.1 Attract, engage and retain a highly-skilled, diverse workforce and cultivate an inclusive environment.	• Deliver timely and relevant training and leadership development programs for all staff. • Promote inclusive leadership that values diverse perspectives and maximizes employees' contributions. • Apply employee feedback that measures engagement to support continuous improvement of the workplace.
3.2 Deliver an efficient organizational design supported by improved business processes and innovation.	• Implement a human capital plan to support strategic and business priorities. • Protect the NCUA staff, facilities and critical infrastructure. • Implement secure, reliable and innovative technology solutions. • Gain efficiencies through quality processes, systems, and project management.
3.3 Ensure sound corporate governance.	• Foster an effective risk management and internal control environment. • Align the NCUA's resources to focus on executing and supporting the core mission. • Promote sound financial management and stewardship principles.

Strategies

- Develop policies and practices to minimize bias in human capital processes.
- Build agency-wide inclusion competencies, skills, and awareness.
- Develop and maintain the knowledge, skills, and abilities of the agency's workforce to consistently identify and meet emerging mission-related needs.
- Improve the quality of critical hiring decisions through the use of effective assessment tools.
- Maintain an effective plan of succession to ensure continuity of leadership throughout all levels of the organization.
- Expand diversity and inclusion curriculum and training materials, focusing on unconscious bias and inclusive leadership.
- Introduce emerging and secure technology that supports the agency's examination, data collection, and reporting efforts in a cost efficient and effective manner.
- Study the opportunity for consolidating all data management functions and governance into one office.
- Improve the records management program to fully comply with federal directives and integrate the records management function throughout the agency.
- Maintain a structured set of privacy controls to protect and ensure the proper handling of personally identifiable information.
- Implement sound business processes consistent with best practices and applicable standards.
- Promote efficient, transparent operations that support accountability, reporting, and decision making.
- Achieve favorable financial statement audit results through a robust system of internal controls.
- Promote a risk-aware culture where risk analysis is formally integrated into our decision-making process.
- Address control deficiencies and open audit recommendations.
- Modernize the NCUA's procurement program and practices.
- Promote cost-conscious buying practices and further integrate supplier diversity into the contracting process.
- Deliver exceptional quality security and safety training to improve preparedness and safeguard the NCUA staff.
- Develop and implement agile security countermeasures and emergency procedures to comply with federal standards for protecting the agency's employees, facilities and assets.

External Factors

- Changes in economic conditions that affect the availability of qualified candidates or external employment options of current agency staff.
- Changes in preferences of members of the workforce (including quality of life, travel burdens, and upward mobility) associated with a growing millennial, aging and diverse population.
- Changes in economic conditions or in credit union products and services that may require rapid adjustment of staff skills and resources.
- An unusually large number of staff retirements associated with the aging of the Baby Boomer population, without adequate transmission of institutional knowledge.
- Changes in national security conditions that affect the safety and security of the NCUA staff or facilities.
- Legislative changes.

Enterprise Risk Management

The NCUA is subject to a variety of risks that relate to its objectives, strategies, operations, reputation, and environment. To sustain success and continuity at the NCUA, an effective risk management approach requires a defined framework where specific risks, and broader organizational risks, are identified, measured and monitored by functional owners and consolidated by an independent risk management oversight function. Working collaboratively with functional owners, the risk management apparatus prioritizes and optimizes risk management and mitigation on a consistent and continuous basis to increase the NCUA's success at achieving stated strategic goals. Effective internal controls, combined with robust measurement and communication are central to effective decision making and risk optimization within the NCUA.

The NCUA established its Enterprise Risk Management (ERM) function to:

- Integrate and improve decision-making to aid in achievement of the agency's mission and strategic goals by weighing each recommendation and decision against the risk appetite levels established in this statement,
- Communicate, through the risk appetite statement, the amount of risk the agency is willing to accept in pursuit of its strategic goals and objectives, and
- Consistently evaluate risks across the NCUA through an established ERM process of identifying, assessing, prioritizing, responding to and monitoring risks and opportunities.

The NCUA ERM Council provides oversight of the agency's ERM activities including risk management prioritization and integrated decision-making. As part of the ERM function, the Risk Appetite Statement articulates the amount of risk the agency is willing to accept in pursuit of its strategic goals and objectives. It serves as the foundation for ERM at the NCUA, defining leadership's overarching risk management philosophy.

Enterprise Risk Appetite Statement

The NCUA is vigilant and has an overall judicious risk appetite. The NCUA's primary goal is to ensure the safety and soundness of the credit union system and the agency recognizes it is not desirable or practical to avoid all risk. Acceptance of some risk is often necessary to foster innovation and agility. This risk appetite will guide the NCUA's actions to achieve its strategic objectives in support of providing, through regulation and supervision, a safe and sound credit union system, which promotes confidence in the national system of cooperative credit.

This enterprise risk appetite statement is part of the NCUA's overall management approach and is supported by detailed risk appetite statements. The agency's risk appetite will help align risks with opportunities when making decisions and allocating resources to achieve the agency's strategic goals and objectives.

Risk Appetite in Practice

Risk is unavoidable and sometimes inherent in carrying out the agency's mandate. The NCUA is positioned to accept greater risks in some areas than in others; however, when consolidated, the risk appetite should be within the boundaries established for the entire agency. Cross-collaboration across programs and functions is a fundamental piece of ensuring the agency stays within its risk appetite boundaries. The NCUA will identify, assess, prioritize, respond to and monitor risks to an acceptable level.

Evaluations and Research

The NCUA uses program evaluations as an integral part of its effort to continuously improve and enhance mission performance. Both external and internal entities evaluate the NCUA's performance using a variety of tools. The principal external and internal evaluations are listed below.

Government Accountability Office (GAO) evaluations are performed as necessary. The GAO conducts program and program support related evaluations of the NCUA.

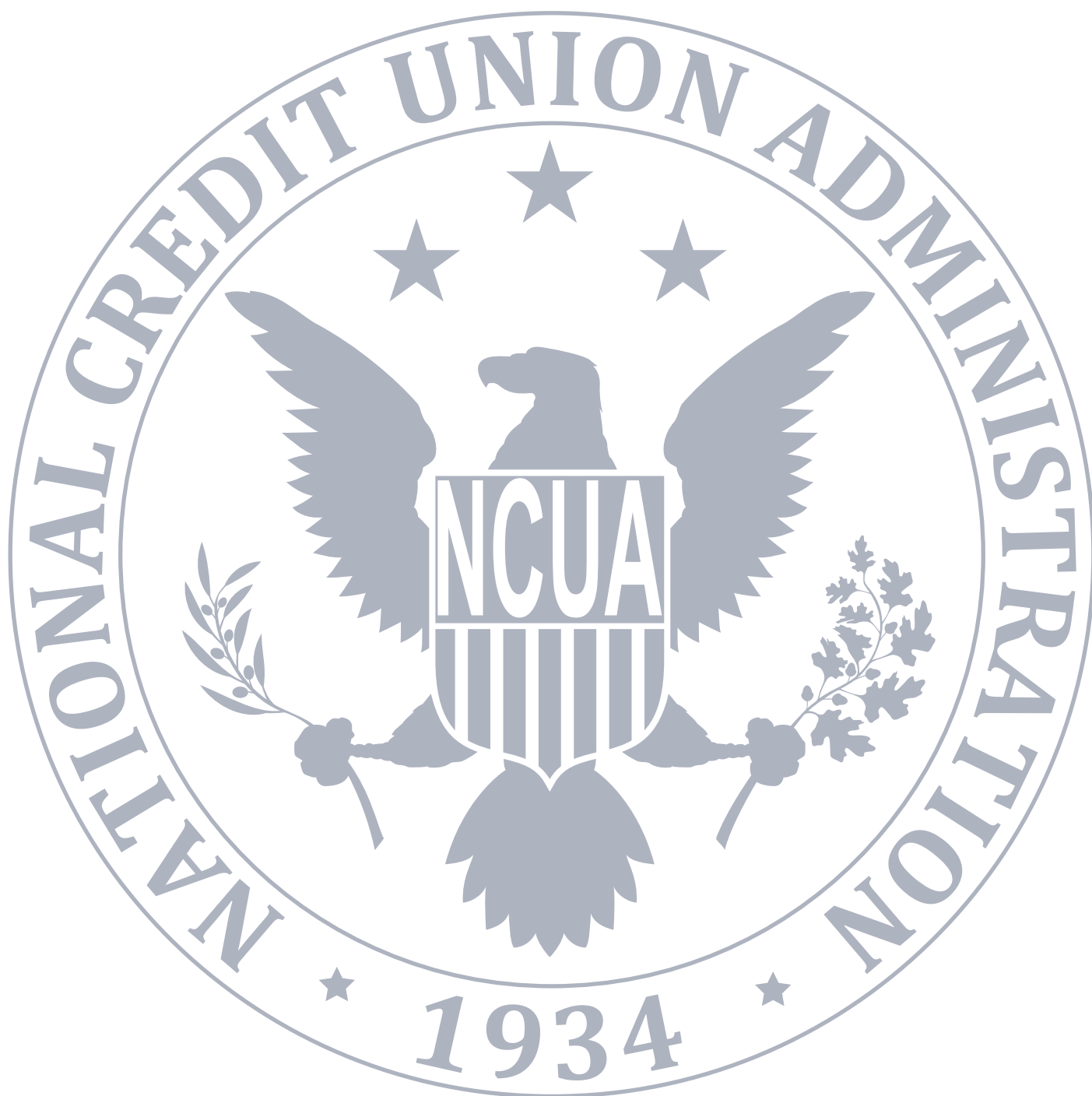
Financial audits are conducted annually by an outside audit firm contracted by the **Office of the Inspector General (OIG)**. The firm audits the NCUA Operating Fund, National Credit Union Share Insurance Fund, Temporary Corporate Credit Union Stabilization Fund, Central Liquidity Facility, and the Community Development Revolving Loan Fund.

The **Federal Information Security Modernization Act (FISMA)** of 2014 requires the ongoing evaluation of the effectiveness of NCUA's information security program. This includes the evaluation of specific IT controls that are also leveraged within the agency's financial and administrative management systems. The **Federal Managers Financial Integrity Act (FMFIA)** of 1950 requires ongoing evaluations and reporting of the adequacy of the systems of internal accounting and administrative control.

OIG evaluations and **Material Loss Reviews** are conducted throughout the year. These independent evaluations are performed in accordance with OIG procedures and include reviews of the NCUA programs and program support operations.

A federal **Employee Viewpoint Survey** is conducted annually by the Office of Personnel Management (OPM). The survey measures the opinions of the NCUA staff on a wide range of topics.

The **Office of the Chief Economist (OCE)** is responsible for enhancing the NCUA's understanding of emerging microeconomic and macroeconomic risks by producing meaningful and robust modeling and risk identification tools. Their economists and analysts compile data on the credit union system's financial performance; merger activity, changes in credit union chartering and fields of membership, as well as broader economic trends that can affect the health of credit unions.





National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314
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NCUA.gov



Tab 12



NCUA
National Credit Union Administration

Diversity and Inclusion Strategic Plan

2018–2022

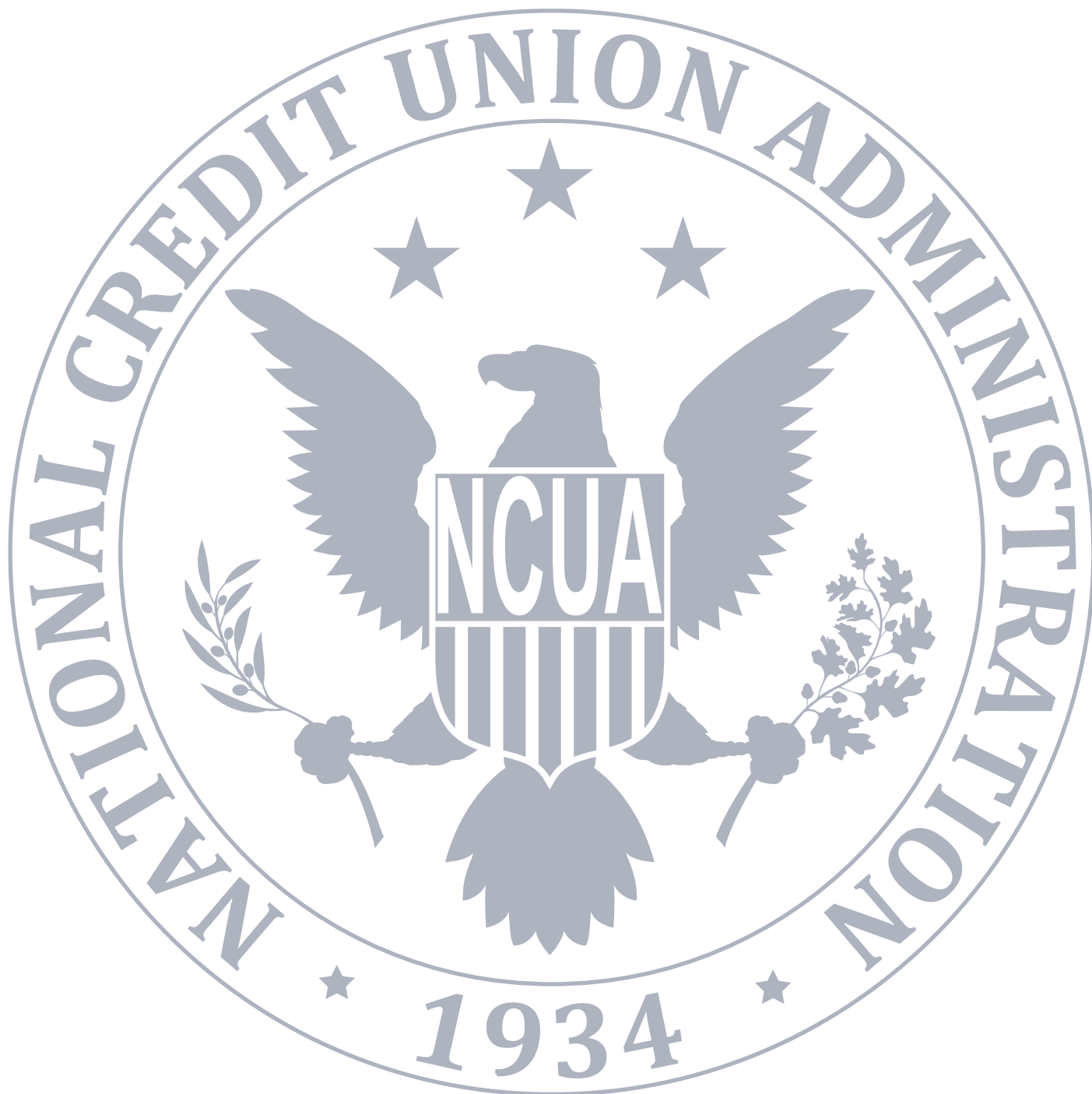




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Message from the Board

In accordance with the concept of “come now, let us reason together,” people with diverse experiences and backgrounds come together with their ideas and collaborate to reach the best possible solution. Promoting a diversity of backgrounds and experiences among our staff will help us better achieve our agency’s mission.

Since the first credit union in the U.S. opened in 1909, our country’s credit union system has been grounded on the principle of people helping people, on cooperative effort to build more secure financial futures for their members.

This idea of drawing strength from a broad range of talents and perspectives applies, as well, to the NCUA’s efforts to create a diverse and inclusive environment where every member of our staff can make the most of her or his own opportunities and, in turn, build a stronger agency.

A more diverse and inclusive workforce helps drive innovation by bringing a variety of perspectives to bear on how we meet the challenges we face. It’s a well-proven business model our agency is committed to incorporating into our activities. We encourage credit unions to assess their own structures and processes to find opportunities to grow and to serve their members and communities by promoting these values.





Introduction from the Office of Minority and Women Inclusion

I am pleased to present this diversity and inclusion strategic plan. This plan is the collaborative product of several NCUA stakeholders, including the staff of the Office of the Minority and Women Inclusion and the Office of Human Resources, the Diversity Advisory Council, the entire NCUA senior leadership team, and the Talent Management Council. The NCUA, as an agency, owns this plan and the commitment to make diversity and inclusion strategic business imperatives for this organization. I am thrilled to be a part of an agency that is willing to work together to make this happen.



Monica Davy

Director
Office of Minority and Women
Inclusion

The NCUA has long been committed to having a more diverse workforce and leadership team. At the core of this strategic plan are four focus areas for the next five years: a broader definition of diversity, the business case, intentional inclusion, and the mitigation of unconscious bias. I believe if we make advancements in these four areas, the NCUA will be positioned for significant, long-term, sustainable progress.

In the diversity and inclusion space, we are often asked what success looks like or how it can be quantifiably measured. Five years from now, my hope is the NCUA and the credit union industry will not only look different with respect to visible diversity, but will embrace and leverage the value of invisible differences. I also hope to see a greater understanding of the undeniable benefits diversity and inclusion bring to our organization and industry. Success is being committed to diversity and inclusion not because it is the right thing to do, but because we genuinely believe it is the smart thing to do.

OMWI's Vision

To promote diversity within NCUA and the credit union system and ensure equal opportunity in NCUA's employment and business activities.

OMWI's Mission

An inclusive culture where differences are leveraged to ensure a safe and sound credit union system.

OMWI's Values

- Intentionally include
- Respect differences
- Embrace change
- Drive innovation
- Realize the power of people



2012-2016 Strategic Plan Accomplishments

The 2012-2016 Diversity and Inclusion Strategic Plan consisted of three goals: Workforce Diversity, Workplace Inclusion, and Sustainability. With a variety of diversity and inclusion initiatives led throughout the agency, the NCUA made considerable progress in each of these areas. Examples of these accomplishments are listed below.

Goal 1: Workforce Diversity	✓ Instituted policy to require diverse interview panels ✓ Expanded special emphasis programs to include LGBT and veterans and broadcasted all events virtually ✓ Established diversity advisory council with executive membership
Goal 2: Workplace Inclusion	✓ Established agency-wide mentor program ✓ Established employee resource group program ✓ Included inclusion specific language in employee survey ✓ Established an exit interview process with independent vendor ✓ Provided unconscious bias training to the entire workforce
Goal 3: Sustainability	✓ Diversity and inclusion with measurable strategies included as a goal in the agency's strategic plan ✓ Included diversity and inclusion performance measures in all manager and executive performance plans ✓ Updated procurement process to include invitations to minority- and women-owned businesses ✓ Increased minority- and women-owned business contracts from 11 to 32.4 percent

The Definitions: What are Diversity and Inclusion?

Diversity

Everything that makes you who you are and what makes you different from someone else, to include race, gender, religion, ability, age, sexual orientation, background, education, experiences, talents, skills, and much more

Inclusion

The practice of leveraging diverse perspectives, backgrounds, skills, and talents to allow each employee to feel valued and able to contribute to his or her full potential in achieving the mission of the agency

Diversity and Inclusion

Together, diversity and inclusion are strategic business imperatives that are part of who we are as an organization and how we do business, allowing us to leverage the diversity of our staff to achieve the agency's mission

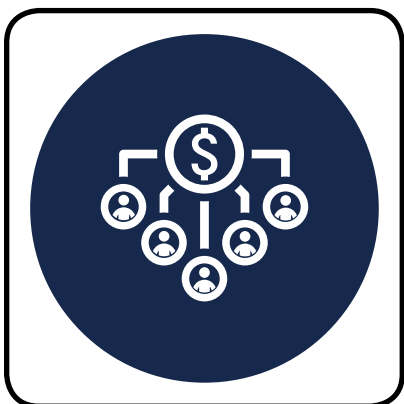


Why Diversity and Inclusion?



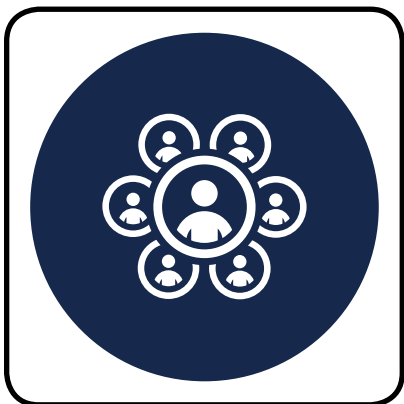
In the Workforce

- **Talent** – a diverse workforce reflects our society and gives us a broader range of potential candidates
- **Innovation** – diversity of thought drives innovation
- **Results** – diverse perspectives, skills, and talent lead to better business results and solutions to business challenges



In Credit Unions

- **Growth** – diversity creates opportunities for growth in untapped markets
- **Innovation** – diversity gives credit unions the ability to create more innovative solutions and services that meet members' needs
- **Talent** – diversity allows credit unions to attract employees and volunteers from a broader pool of talent



In Business Activities

- **Competitive pricing** – supplier diversity creates competition among vendors
- **Innovation** – a diverse supply chain provides new and innovative business solutions
- **Community** – supplier diversity economically empowers the diverse communities in which the NCUA and the credit unions operate



The Business Case

Over the past few decades, the concepts of diversity and inclusion have evolved in significant ways. What began with the Civil Rights Movement has become a critical strategic imperative for business success. Initially, diversity was almost exclusively related to equal opportunity, which was primarily focused on race and gender. Today, racial and gender diversity remain critical and the NCUA is committed to improving the racial and gender make-up of our workforce and leadership team. However, we define diversity in its broadest sense. It is everything that makes us who we are, and all the ways we are different from everyone else.

When we view diversity as more than race and gender, to include diversity of thought, ideas, background, and experiences, it sparks creative insights, better solutions, and ultimately, greater efficiencies. But making an organization or a credit union more diverse is not enough. Diversity without inclusion will not yield the true benefits of diversity. Therefore, it is critical that we focus equally, or even more so, on inclusion. Inclusion is creating an environment where all differences can be leveraged to help us achieve our mission. Inclusion is using our differences to make a difference. Creating a workplace environment that taps into the unique talents and strengths of different employees leads to greater employee satisfaction and higher productivity while allowing us to understand the diversity of our workforce and regulated entities better. As such, diversity and inclusion are not just about who we are, but the way we carry out our mission. This includes the way we work together; the way we think about and solve problems; the way we engage our employees and tap into the unique strengths each of us brings to the workplace; and the way we ensure a safe and sound credit union system.

The kind of change necessary to create a truly diverse and inclusive workplace involves shifting the way employees, especially leaders, think and act. Achieving the lofty goals of diversity and inclusion requires a great deal of collaboration. Senior leaders, managers, and employees at every level must see diversity and inclusion as essential, everyday responsibilities. When viewed in this light, every office, region, and employee can apply this “business case” for diversity and inclusion to their everyday responsibilities.





Aligning Strategies: The NCUA and OPM's Strategic Plans

The NCUA's Strategic Plan: The 2018-2022 Diversity and Inclusion Strategic Plan was not established independently. Each goal in this plan directly ties to one of the three goals outlined in the NCUA's Strategic Plan for 2018-2022. The strategies identified to achieve our diversity and inclusion goals also contribute to achieving the NCUA's overall objectives, and ultimately its mission. Performance for each objective will be measured against targets and indicators. The following pages contain detailed summaries of the diversity and inclusion goals and strategic objectives for 2018-2022, in support of the following NCUA strategic goals and objectives:

Goal 1: Ensure a safe and sound credit union system	1.1 Maintain a strong Share Insurance Fund. 1.2 Provide high-quality and efficient supervision.
Goal 2: Provide a regulatory framework that is transparent, efficient, and improves consumer access	2.1 Deliver an effective and transparent regulatory framework. 2.2 Enforce federal consumer financial protection laws and regulations in federal credit unions. 2.3 Facilitate access to federally-insured credit union financial services.
Goal 3: Maximize organizational performance to enable mission success	3.1 Attract, engage, and retain a highly-skilled, diverse workforce and cultivate an inclusive environment. 3.2 Deliver an efficient organizational design supported by improved business processes and innovation. 3.3 Ensure sound corporate governance.

OPM's Strategic Plan: The NCUA's goals for diversity and inclusion also reflect those established by the Office of Personnel Management in the Government-wide Inclusive Diversity Strategic Plan for 2016:

Goal 1: Diversify the federal workforce through active engagement of leadership	1.1 Emphasize the importance of inclusive diversity efforts by utilizing a wide range of communication strategies and tools that demonstrate their support for these initiatives. 1.2 Review the wide range of policies, programs, systems, and techniques currently in use and determine specific initiatives that should be enhanced and improved. 1.3 Develop and implement broad outreach strategies to attract leaders from diverse sources to the organization through strategic partnerships.
Goal 2: Include and engage everyone in the workplace	2.1 Foster a culture of inclusion and engagement by employing culture change strategies. Provide training and education on cultural competency, implicit bias awareness, and inclusion learning for all employees. 2.2 Assess, redesign, and reengineer organizational structures and business processes to promote teamwork, collaboration, cross-functional operations, and transparency; and to deconstruct organizational siloes that lead to exclusive cultures and to flawed decision-making.
Goal 3: Optimize inclusive diversity efforts using data-driven approaches	3.1 Create a diverse, high-performing workforce, using data-driven approaches to recruitment, including analyzing applicant flow data. 3.2 Foster a diverse, high-performing workforce by using data-driven approaches to promotion opportunities and career development. 3.3 Collect relevant performance data to establish a business case for diversity and inclusion for the agency.



2018-2022 Strategic Goals for Diversity and Inclusion

GOAL 1: WORKFORCE DIVERSITY (NCUA Goal 3.1)

Sustain a skilled, highly engaged, and diverse workforce at all levels, including leadership

1a. Leadership commitment	Engage and train leadership in understanding and implementing sustainable diversity and inclusion strategies
1b. Inclusive recruitment	Conduct inclusive recruitment and selection practices
1c. Access to opportunities	Provide all employees with equal access to developmental and advancement opportunities
1d. Retention	Identify and address barriers that could lead to lower retention of under-represented groups
1e. Leadership diversity	Build and sustain a diverse leadership team

GOAL 2: INCLUSION (NCUA Goal 3.1)

Cultivate an inclusive workplace where employees' unique talents, skills, and perspectives are valued and leveraged

2a. Inclusive initiatives	Develop inclusive workplace initiatives
2b. Inclusive behaviors	Develop inclusive behaviors in leaders
2c. Mitigate bias	Redesign systems to remove opportunities for adverse bias in workplace practices
2d. Disability inclusion	Improve workplace inclusion of employees with disabilities and provide necessary resources for success in their jobs

GOAL 3: EQUAL OPPORTUNITY (NCUA Goals 3.1)

Ensure equal opportunity with proactive workplace resolutions

3a. Non-discriminatory workplace	Maintain a workplace free of discrimination
3b. Conflict resolution	Implement processes to mitigate and resolve workplace conflict
3c. Workplace accommodations	Provide effective and reasonable workplace accommodations for employees with disabilities

GOAL 4: SUPPLIER DIVERSITY (NCUA Goal 3.2)

Build a robust and integrated supplier diversity program within the NCUA

4a. Embed procedures	Implement effective procurement procedures that support supplier diversity
4b. Increased competition	Increase opportunities for diverse suppliers to participate in competition
4c. Supplier development	Advance the development of diverse suppliers
4d. Awareness	Improve internal supplier diversity awareness

GOAL 5: CREDIT UNION DIVERSITY (NCUA Goals 1.2 and 2.3)

Promote diversity and inclusion as valued business imperatives in the credit union system

5a. Business case	Build awareness of the value of diversity and inclusion in credit unions
5b. Policies and practices	Assess and promote diversity policies and practices in credit unions



GOAL 1: WORKFORCE DIVERSITY (NCUA Goal 3.1)

Sustain a skilled, highly engaged, and diverse workforce at all levels, including leadership

Building a high-performing workforce drawn from all segments of American society requires strategic outreach, broad recruitment, and intentional, proactive efforts to ensure opportunities for success are available to all employees.

1a. Leadership commitment: Engage and train leadership in understanding and implementing sustainable diversity and inclusion strategies

- 1) Develop and promote an agency business case for workforce diversity and inclusion
- 2) Communicate to the workforce the organizational commitment to diversity and inclusion
- 3) Improve diversity and inclusion analytics and reporting
- 4) Hold leadership accountable for implementing diversity and inclusion initiatives through performance evaluations
- 5) Develop diversity and inclusion competencies in leadership

1b. Inclusive recruitment: Conduct inclusive recruitment and selection practices

- 1) Develop recruitment processes, tools, and technology that reach and attract diverse and highly qualified talent
- 2) Ensure, to the extent possible, diverse interview and ranking panels for all vacancies
- 3) Ensure interviews are conducted using consistent, structured, and objective criteria and processes
- 4) Provide resources to help staff recognize and mitigate unconscious bias in all hiring processes
- 5) Involve managers and supervisors in targeted outreach and other recruitment activities
- 6) Develop a proactive and robust Schedule A disability hiring program (Executive Order 13548)
- 7) Ensure recruitment outreach is extended to all areas of consideration, locally and nationally, to expand the ability to create a diverse workforce

1c. Access to opportunities: Provide all employees with equal access to developmental and advancement opportunities

- 1) Identify and address any barriers that inhibit inclusion in development opportunities
- 2) Maintain inclusive mentoring program with diverse participants
- 3) Ensure fair access to training and development
- 4) Implement individual development plans for every employee
- 5) Develop transparent detail program and increase awareness of opportunities

1d. Retention: Identify and address barriers that could lead to lower retention of under-represented groups

- 1) Assess factors leading to employees' decision to leave or stay at the NCUA
- 2) Identify and address barriers that lead to higher than average attrition rates of under-represented groups

1e. Leadership diversity: Build and sustain a diverse leadership team

- 1) Build and maintain a sustainable and diverse leadership pipeline
- 2) Identify and implement best practices for succession planning of agency-critical positions
- 3) Use succession planning to identify and broaden career development opportunities



GOAL 2: INCLUSION (NCUA Goal 3.1)

Cultivate an inclusive workplace where employees' unique talents, skills, and perspectives are valued and leveraged

Cultivating an inclusive workplace allows differences to make a difference. Encouraging employees to achieve their fullest potential through flexibility, collaboration, and empowerment leads to higher levels of individual engagement and better organizational outcomes.

2a. Inclusive initiatives: Develop inclusive workplace initiatives

- 1) Build agency-wide inclusion competencies, skills, and awareness
- 2) Further develop the NCUA's Special Emphasis Program using federal agencies' best practices
- 3) Convene and support the NCUA's Diversity Advisory Council
- 4) Develop a Schedule A (disability) support program
- 5) Develop and support business-aligned employee resource groups

2b. Inclusive behaviors: Develop inclusive behaviors in leaders

- 1) Develop a leadership toolkit based on building inclusion competencies
- 2) Incorporate diversity and inclusion curriculum into leadership development programs
- 3) Hold executives, managers, and supervisors accountable for inclusive behaviors through performance evaluations

2c. Mitigate bias: Redesign systems to remove opportunities for adverse bias in workplace practices

- 1) Implement strategies to identify and address bias in agency programs, policies, and practices
- 2) Provide progressive levels of bias-related curriculum and training for all staff

2d. Disability inclusion: Improve workplace inclusion of employees with disabilities and provide necessary resources for success in their jobs

- 1) Ensure needs of employees with disabilities are incorporated into business practices, policies, and processes
- 2) Create a culture where universal access is a top priority
- 3) Identify and address challenges faced by employees with disabilities



GOAL 3: EQUAL OPPORTUNITY (NCUA Goal 3.1)

Ensure equal opportunity with proactive workplace resolutions

Providing equal employment opportunities for employees and applicants for employment ensures fair treatment and affords talented men and women every opportunity to fully participate in the NCUA's workforce and to contribute to the accomplishment of the agency's mission. Equitable practices also bolster the NCUA's reputation as an employer of choice and a strong, effective, high-performing public service organization.

3a. Non-discriminatory workplace: Maintain a workplace free of discrimination

- 1) Provide a model EEO program
- 2) Provide engaging and relevant non-discrimination education and training to all employees
- 3) Improve employee knowledge of and access to EEO programs and resources
- 4) Hold managers and employees accountable for maintaining a non-discriminatory workplace through performance evaluations

3b. Conflict resolution: Implement processes to mitigate and resolve workplace conflict

- 1) Develop conflict resolution and mitigation competency in leaders
- 2) Identify and train staff members (cross-regional) to serve as "Collateral Workplace Resolution Advisors"
- 3) Build cultural awareness and skills to mitigate conflict over differences

3c. Workplace accommodations: Provide effective and reasonable workplace accommodations for employees with disabilities

- 1) Benchmark and implement best practices for providing reasonable accommodations
- 2) Provide employees with reasonable accommodations needed to perform essential job functions



GOAL 4: SUPPLIER DIVERSITY (NCUA Goal 3.2)

Build a robust and integrated supplier diversity program within the NCUA

Ensuring diversity in business activities drives competition to improve service and pricing, promotes better and more innovative solutions for the agency, and creates economic development that adds value to the communities the NCUA serves.

4a. Embed procedures: Implement effective procurement procedures that support supplier diversity

- 1) Identify components of current procurement process that inhibit supplier diversity
- 2) Incorporate best supplier diversity practices into procurement procedures
- 3) Conduct near- and long-term procurement forecasting to support supplier diversity
- 4) Ensure supplier diversity is incorporated early in the procurement planning process
- 5) Provide supplier diversity training to all new employees in the procurement area
- 6) Keep office and regional directors informed of current supplier diversity standing through quarterly reporting

4b. Increased competition: Increase opportunities for diverse suppliers to participate in competition

- 1) Foster outreach to minority- and women-owned businesses
- 2) Identify and encourage opportunities for minority- and women-owned business participation in the bidding process
- 3) Analyze procurement activity for minority- and women-owned businesses invited, responding to, and awarded contracts
- 4) Ensure compliance with one-third inclusion outreach guideline

4c. Supplier development: Advance the development of diverse suppliers

- 1) Coordinate and promote technical assistance for minority- and women-owned businesses to help improve success in the NCUA's bidding process
- 2) Facilitate better relationships between prime contract vendors and minority- and women-owned businesses to encourage sub-contracting partnerships
- 3) Coordinate and leverage technical assistance offered by federally funded programs, including mentor-protégé programs
- 4) Promote capability briefings between minority- and women-owned businesses and program offices prior to contracting posture
- 5) Create and maintain a nationwide database of minority- and women-owned businesses for the agency's top-purchased products and services

4d. Awareness: Improve internal supplier diversity awareness

- 1) Conduct analysis and provide feedback to program offices regarding supplier diversity results
- 2) Conduct proactive and consistent minority- and women-owned business market research within the NCUA programs
- 3) Educate office and regional directors and contracting officials about supplier diversity program and requirements
- 4) Develop and promote the business case for supplier diversity



GOAL 5: CREDIT UNION DIVERSITY (NCUA Goals 1.2 and 2.3)

Promote diversity and inclusion as valued business imperatives in the credit union system

Building diversity within the credit unions will lead to better service, greater innovation, improved solutions, and increased membership. These things make credit unions strong and sustainable, which ultimately leads to greater strength for the entire credit union system.

5a. Business case: Build awareness of the value of diversity and inclusion in credit unions

- 1) Create distinct and separate business cases for large and small credit unions and promote them to the industry and the NCUA examiner staff
- 2) Partner with credit unions with effective programs to support the NCUA in promoting diversity
- 3) Partner with trades and associations to promote diversity and inclusion
- 4) Build and maintain a diversity and inclusion toolkit for credit unions
- 5) Implement a #CUs for Diversity campaign as a marketing tool

5b. Policies and practices: Assess and promote diversity policies and practices in credit unions

- 1) Promote the use of the NCUA's Voluntary Credit Union Diversity Self-Assessment Checklist
- 2) Educate credit union staff on the proper completion and submission for reporting EEO-1 data to the EEOC
- 3) Share strategies to increase representation of under-represented and under-served groups
- 4) Identify and highlight best and leading diversity and inclusion practices within trades and credit unions



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Tab 13

NCUA INSTRUCTION

NO. 1235.08 (REV)

DATE: June 26, 2015

SUBJ: Prevention of Harassment in the Workplace

TO: All NCUA Staff

1. **PURPOSE.** The Instruction establishes NCUA's policy on preventing harassment (including sexual harassment) in the workplace, and the procedure for employees and contractors to report harassment complaints.
2. **CANCELLATION.** NCUA Instruction No. 1235.08 dated July 6, 2006 and Instruction No. 1235.2 (REV) dated June 10, 2004 are cancelled and replaced by this revised Instruction.
3. **BACKGROUND.** The U.S. Equal Employment Opportunity Commission (EEOC) enforces the prohibitions against employment discrimination in Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967, Titles I and Title V of the Americans with Disabilities Act of 1990, Sections 501 and 505 of the Rehabilitation Act of 1973, Title II of the Genetic Information Nondiscrimination Act of 2008, and the Civil Rights Act of 1991. These laws prohibit discrimination based on race, color, gender, sexual orientation, religion, national origin, age, disability, status as a parent, and genetic information, as well as reprisal for protected activity.

Title 29 Code of Federal Regulations 1604.11, issued by the U.S. Equal Employment Opportunity Commission recognizes sexual harassment as a violation of Section 703 of Title VII.

Guidance issued by the EEOC established harassment as a form of discrimination prohibited under each anti-discrimination statute. NCUA is committed to equal employment opportunity and a workplace free of discriminatory harassment.

4. **DEFINITIONS.**

- A. **Employee.** The term "employees" applies to all NCUA employees and non-employees in NCUA workspace while performing their official duties.

- B. **Harassment.** Violation of federal law that involves discriminatory conduct on the basis of an individual's membership in a protected class, where such conduct is so objectively offensive as to alter the conditions of the victim's employment (i.e., the harassment culminates in a tangible employment action or was sufficiently severe or pervasive to create a hostile work environment). For purposes of this Instruction, harassment includes sexual harassment.
- C. **Harassing Conduct.** Harassing conduct is defined as unwelcome verbal or physical conduct based on one's protected class, i.e., race, color, sex, sexual orientation, religion, national origin, age, disability, status as a parent, and genetic information, or reprisal for involvement in a protected Equal Employment Opportunity (EEO) activity when:
1. The behavior creates an offensive or intimidating environment that unreasonably interferes with work performance; or
 2. The conduct adversely affects employment opportunities based on the employee's acceptance or rejection of such conduct.
- D. **Hostile Work Environment.** Examples of repeated, extreme, or pervasive conduct that may form the basis of a hostile work environment claim include:
1. Making disparaging remarks about an individual's gender that are not sexual in nature;
 2. Expressing negative stereotypes regarding an employee's birthplace or ancestry;
 3. Derogatory or intimidating references to an employee's mental or physical impairment;
 4. Comments about an individual's skin color or other racial/ethnic characteristics;
 5. Negative comments about an employee's religious beliefs (or lack of religious beliefs);
 6. Negative comments regarding an employee's age when referring to employees 40 and over; and
 7. Use of racially derogatory words, phrases, and epithets.
- E. **Sexual Harassment.** Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when this conduct:
- 1) Explicitly or implicitly affects an individual's employment;

- 2) Unreasonably interferes with an individual's work performance; or
- 3) Creates an intimidating, hostile, or offensive work environment.

Unwelcome sexual conduct can occur by any form of communication. Sexual harassment includes, but is not limited to:

- 1) Any implicit or explicit sexual conduct to influence or affect the career, pay, or job of another employee;
 - 2) Sexually oriented comments about an individual's body or sexual prowess;
 - 3) Sexually offensive comments, gestures, jokes, advances, physical contact, or propositions; or
 - 4) Any display of sexually suggestive objects or pictures in the workplace.
5. **POLICY.** NCUA is committed to maintaining a work environment free of harassing conduct in the workplace and correcting harassing conduct that does occur before it becomes severe or pervasive. In keeping with its commitment to maintain a work environment that is free of discriminatory harassment, NCUA will not tolerate unlawful harassment of employees by any supervisor, co-worker, or third party.
- A. **Scope.** This policy covers all forms of harassment, including sexual harassment, and applies to both NCUA employees and non-employees in NCUA workspace while performing their official duties. It also applies to the conduct of third parties who visit NCUA facilities and to third parties at facilities visited by NCUA employees on official NCUA business. Third parties include vendors, contractors, and credit union officials or staff.

NCUA's harassment policy includes sexual harassment that may include employees' conduct outside of NCUA workspace, because conduct between NCUA employees occurring outside of the agency's workplace may adversely impact the agency's work environment. Conduct outside of NCUA workspace will be considered on a case-by-case basis.

NCUA's prevention of sexual harassment policy also applies to the conduct of third parties who visit NCUA facilities and to third parties at facilities visited by NCUA employees on official NCUA business. Third parties include vendors, contractors, and credit union officials or staff.

6. **RESPONSIBILITIES.**

- A. **Employees.** Each employee is responsible for adhering to this policy and for cooperating fully in its enforcement. Employees are responsible for ensuring that their language and conduct is considerate of the rights and privileges of others in the conduct of their official duties. Employees must not engage in harassing conduct. All NCUA staff members are responsible for adhering to NCUA's anti-harassment policy and for cooperating fully in its enforcement, including the investigation of alleged incidents of harassment, sexual or otherwise.

Employees have the right to oppose any allegedly discriminatory employment practice or decision and to participate in the discrimination complaint process, including participation as a witness when complaints are filed by others.

Employees are responsible for reporting any incident of harassing conduct they experience *before* it becomes a pattern of misconduct that is pervasive and offensive as to constitute a hostile work environment. When an employee unreasonably fails to take advantage of this procedure and does not promptly report an incident of harassing conduct as set forth herein, NCUA reserves the right to raise this failure to report as a defense against a suit for harassment.

- B. **Supervisors.** NCUA supervisors are responsible for ensuring that the NCUA workplace meets the requirements of federal anti-discrimination policies and directives and is free of offensive language or conduct.¹ Supervisors must continuously monitor their work environment to ensure compliance with this policy.

All supervisors and managers are responsible for acting promptly and appropriately to prevent harassment in the workplace when they observe harassing conduct or are otherwise made aware of such conduct. Likewise, they are responsible for acting appropriately to prevent retaliation against those who complain of harassment.

When an employee complains to management about alleged harassment, management is obligated to investigate the allegation regardless of whether the complaint conforms to a particular format or is made in writing. Supervisors, therefore, must immediately advise the Director of NCUA's Office of Minority and Women Inclusion (OMWI) about any incident of harassing conduct that they witness or is otherwise brought to their attention.

- C. **Office of Inspector General.** All harassment allegations brought by a non-employee against an NCUA employee will be handled by the Office of Inspector General.

¹ This Instruction uses the term "supervisor" throughout to cover all individuals serving in both managerial and supervisory positions.

- D. **Office of Minority and Women Inclusion (OMWI)**. All harassment allegations brought by an NCUA employee or job applicant will be handled by OMWI. OMWI will also refer all complaints involving an employee and non-employee to the Office of Inspector General for consideration.

7. **PROCEDURES FOR RESOLVING COMPLAINTS.**

Sexual Harassment Claims: An employee who believes they have experienced sexual harassment should first inform the offending person that such conduct is unwelcome and must stop. If the employee is not convinced the offending conduct will stop, the employee should immediately report the matter to their supervisor or the OMWI Director. An employee may select either the Internal NCUA Complaint Process or the Formal EEO Complaint Process for sexual harassment claims.

All Other Claims: Employees may select either the Internal NCUA Complaint Process for non-basis harassment claims or the Formal EEO Complaint Process for harassment claims based on race, color, religion, gender (including sexual, nonsexual, pregnancy, or same sex), national origin, disability, age (40 years or older), sexual orientation, protected genetic information (information about an individual's genetic tests, or the manifestation of a disease or disorder in the individual's family members), status as a parent, and retaliation for participating in the EEO complaint process or opposing discriminatory practices.

- A. **Internal NCUA Process for Harassment Claims.** An NCUA employee who alleges harassment by either an offending NCUA employee or third party must notify their supervisor or the OMWI Director before the conduct becomes severe or pervasive. OMWI will conduct an inquiry and attempt to informally resolve the matter with appropriate NCUA officials. The OMWI Director, at his or her discretion, will assign an independent fact-finder who will conduct a prompt, thorough, and impartial inquiry into the claim. After completion of the fact-finding inquiry, the independent fact-finder will determine whether harassment occurred and offer remedies or options for resolution.

1. **Corrective Action.** Harassment may take different forms and, therefore, require different corrective actions. The circumstances of each case will dictate the corrective action required.

If a fact-finding inquiry reveals that unlawful harassment occurred, the supervisor of the offending NCUA employee will consult with NCUA's Office of Human Resources to determine immediate and appropriate corrective action, including any warranted disciplinary action. This responsibility normally rests with the first-line supervisor of the employee alleged to have engaged in the harassing conduct unless such supervisor is involved in the allegation.

If the offending party is not from NCUA, the agency will take action reasonably calculated to ensure that the conduct does not recur. In either circumstance, the Office of Human Resources will inform the OMWI Director of the corrective action decision, including a decision not to act.

2. **Confidentiality.** All information involving harassment allegations will remain confidential. Documents containing information collected during an inquiry or investigation of such allegations will be stored consistent with personally identifiable information security standards. The information collected is to be kept confidential and shall only be shared with individuals having an official need to know. An individual's identity will remain confidential unless such disclosure is authorized by the individual or the disclosure is unavoidable due to the nature of the allegations.
3. **Protection from Retaliation.** It is unlawful for an individual to be retaliated against for filing harassment allegations, participating in the complaint process, and any other protected activity. NCUA will not tolerate any retaliation against an employee because they engaged in a protected activity or made allegations of harassment, witnessed harassing conduct, or provided information concerning harassment claims. NCUA will take prompt corrective action in any situation involving retaliation.

- B. **Formal EEO Complaint Process.** NCUA employees and applicants for employment who wish to preserve their right to a specific legal remedy for harassment may forego NCUA's internal process and file a harassment complaint under the discrimination complaint procedures of Title 29 Code of Federal Regulations, Part 1614.

The first step in the complaint process requires that the individual contact the OMWI Intake Line at 703-518-6325 or OMWIMail@ncua.gov within 45 days of the most recent incident of harassment. Failure to contact OMWI within the 45-day timeframe may result in the loss of the right to a legal remedy. OMWI will assign the case to an EEO Counselor who will conduct an inquiry and attempt to informally resolve the matter with appropriate NCUA officials. If the matter cannot be resolved, the EEO Counselor will provide the individual with a notice of their right to file a formal complaint.

Once an individual is provided with the right to file a formal complaint, the individual may file a formal harassment complaint with OMWI. When OMWI receives the complaint, it will determine if the complaint is timely filed and acceptable for investigation. If the complaint is investigated, OMWI will issue a Report of Investigation to the complainant and inform him or her of the right to a decision on the merits by NCUA (with or without an administrative hearing), with right of appeal to the EEOC and subsequent review by a Federal District Court. If the ultimate decision (by NCUA, EEOC, or Court) finds that harassment occurred, the complainant will be provided an appropriate remedy. For more information on the formal complaint process, visit the EEOC's website at www.eeoc.gov or contact NCUA's OMWI at 703-518-6325 or OMWIMail@ncua.gov.

8. **EXPIRATION:** This Instruction is effective immediately and will remain in effect until canceled.

/S/
Mark A. Treichel
Executive Director

OMWI/EEO

Tab 14

NCUA



INSTRUCTION

NO. 1270.7 (REV)	DATE: 7/2/2015
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SUBJ: Reasonable Accommodation Policy and Procedures

TO: All NCUA Staff

REF: 29 United States Code (U.S.C.) Section 791 et seq.; 29 Code Federal Regulations (CFR) Part 1614.203; Title I (Employment) of the Americans with Disabilities Act (ADA) of 1990, as amended, 42 U.S.C. §§ 12101 et seq.; 29 C.F.R. part 1630; Executive Order 13164, 65 Federal Register 46565; and the Rehabilitation Act of 1973, as amended.

**ENCL: (1) Reasonable Accommodation Resource List
(2) NCUA Form 1686 - Reasonable Accommodation Request Form**

1. **PURPOSE.**

The purpose of this instruction is to state the policy and procedures for managing requests for reasonable accommodations for employees and applicants with disabilities.

2. **CANCELLATION.**

NCUA Instruction 1270.7, Reasonable Accommodation Procedures, dated October 4, 2002, is cancelled and is replaced by this revised instruction.

3. **BACKGROUND.**

Executive Order 13164 requires that federal agencies establish written procedures for processing requests for reasonable accommodation. The Executive Order guides agencies in implementing the Rehabilitation Act of 1973, as amended, requires an employer to provide reasonable accommodation to qualified employees and applicants for employment, except when such accommodation would cause undue hardship.

This instruction, originally issued on October 4, 2002, is revised to include the provisions of the Americans with Disabilities Amendments Act of 2008, and provides more effective guidelines for processing and monitoring reasonable accommodation requests.

4. **POLICY.**

NCUA's policy is to fully comply with the reasonable accommodation requirements of the Rehabilitation Act of 1973, as amended. This policy applies to NCUA employees and applicants for employment. NCUA is committed to providing reasonable accommodations to its employees and applicants for employment in order to assure that individuals with disabilities enjoy full access to equal employment opportunity. NCUA will process requests for reasonable accommodation in a prompt, fair and efficient manner. NCUA will provide reasonable accommodations:

- A. When an applicant with a disability needs an accommodation to be considered for a job;
- B. When an employee with a disability needs an accommodation to enable him or her to perform the essential functions of the job at an acceptable level or to gain access to the workplace; and
- C. When an employee with a disability needs an accommodation to enjoy equal benefits and privileges of employment.

5. **DEFINITIONS.**

A. **Reasonable Accommodation.** The term reasonable accommodation means:

- 1) Modifications or adjustments to a job application process that enable a qualified applicant with a disability to be considered for the position such qualified applicant desires;
- 2) Modifications or adjustments to the work environment, or to the manner or circumstances under which the position held or desired is customarily performed, that enable an individual with a disability who is qualified to perform the essential functions of that position; or
- 3) Modifications or adjustments that enable employees with a disability to enjoy equal benefits and privileges of employment as are enjoyed by similarly situated employees without disabilities.

A reasonable accommodation may include, but is not limited to, the following:

- Job restructuring;
- Part-time or modified work schedules;

- Reassignment to a vacant position;
- Acquisition or modification of equipment or devices;
- Appropriate adjustment or modifications of examinations, training materials or policies;
- The provision of qualified readers or interpreters; and
- Other similar accommodations for individuals with disabilities.

B. **Qualified Individual with a Disability.** A qualified individual with a disability is a person who satisfies the requisite skill, experience, education and other job-related requirements of the employment position that such individual holds or desires, and who, with or without reasonable accommodations, can perform the essential functions of such positions.

C. **Disability.** A disability is defined as a:

- 1) Physical¹ or mental² impairment that substantially limits³ one or more major life activities⁴;
- 2) Having a record of such an impairment⁵; or
- 3) Being regarded as having such an impairment.

¹ Physical impairment. Any physiological disorder, or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine.

² Mental Impairment. Any mental or psychological disorder, such as an intellectual disability (formerly termed mental retardation), organic brain syndrome, emotional or mental illness, and specific learning disabilities.

³ Substantial Limitation. An impairment is a disability if it substantially limits the ability of an individual to perform a major life activity as compared to most people in the general population. An impairment need not prevent, or significantly or severely restrict, the individual from performing a major life activity in order to be considered a disability.

⁴ Major Life Activities. Major life activities include, but are not limited to, caring for oneself, performing manual tasks, walking, seeing, standing, hearing, speaking, breathing, reading, eating, sleeping, communicating, bending, lifting, concentrating, learning, and working. Major life activities also include the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.

⁵ Record of an Impairment. Having a history of, or misclassified as having, a mental or physical impairment that substantially limits a major life activity. Individuals in this category may be entitled to reasonable accommodations.

D. **Essential Functions.** Essential functions are the fundamental job duties of the employment position the individual with a disability holds or desires. A function can be *essential* if, among other things:

- The position exists to perform that function;
- There are a limited number of other employees who could perform the function or who the function can be distributed amongst; or
- The function is highly specialized and the individual is hired based on his/her ability to perform it.

E. **Undue Hardship.** An undue hardship means that an accommodation would be unduly costly, extensive, substantial or disruptive, or would fundamentally alter the nature or operation of the business. If a particular accommodation would be an undue hardship, the agency must try to identify another accommodation that will not pose such a hardship. The following factors should be considered to determine undue hardship:

- Nature and cost of the accommodation.
- Overall size of the organizational unit with respect to the number of employees, facilities, and size of the budget.
- The impact of the accommodation on the operation of the agency, including the impact on the ability of other employees to perform their duties and the impact on the organization's ability to conduct business.

6. **RESPONSIBILITIES.**

A. **Regional Directors and Office Directors are responsible for:**

- Ensuring compliance with NCUA policies and procedures for the provision of reasonable accommodations.
- Providing leadership within the regions and offices to ensure adequate budget, staff and resources for the provisions of reasonable accommodations.
- Ensuring subordinate supervisors and managers receive training on their responsibilities for the provision of reasonable accommodations.
- Ensuring a discrimination-free workplace and equal opportunity for employees and applicants with disabilities.

- Acting as the decision-maker; in making determinations about accommodations requests from employees.

B. Managers and Supervisors are responsible for:

- Actively engaging in the interactive process with employees who request reasonable accommodations to solicit any additional information needed to make timely determinations on all reasonable accommodation requests.
- Acting as the decision-maker when delegated by Regional and Office Directors.
- Providing appropriate reasonable accommodations for applicants and employees with disabilities.
- Notifying the Disability Program Manager in the Office of Minority and Women Inclusion when they receive a request for an accommodation, and working with agency officials to determine appropriate reasonable accommodations.

C. The Director, Office of Human Resources (OHR) is responsible for:

- Advising NCUA management officials and HR staff on the application of reasonable accommodations for applicants and employees with disabilities.
- Ensuring that building, training and testing facilities, equipment, and related materials are accessible for employees with disabilities.
- Consulting with outside resources, where necessary, to assess an individual's medical condition or disability and the need for reasonable accommodations.
- Exploring and documenting reassignment efforts and counseling employees on disability retirement procedures.

D. The OHR Selective Placement Program Coordinator (SPPC) is responsible for:

- Providing policy and regulatory guidance to agency managers and supervisors on the NCUA Selective Placement Program.
- Serving as an NCUA resource and liaison for organizations concerned with the recruitment and hiring of persons with disabilities; and ensuring agency vacancy announcements are disseminated to those organizations.
- Coordinating applicant interviews and reasonable accommodations for applicants. Collecting applicant resumes and Schedule A hiring authority documentation.

- Monitoring agency workforce statistics to ensure affirmative employment goals and initiatives are met.
- Coordinating NCUA-wide reassignment searches and assisting in placement efforts for qualified employees who can no longer perform their essential functions.

E. **The Director, Office of Minority and Women Inclusion (OMWI) is responsible for:**

- Providing informal equal employment opportunity counseling and processing formal complaints of disability and reasonable accommodation discrimination.
- Developing policies and procedures for the application of reasonable accommodations.
- Providing oversight of agency programs and activities related to reasonable accommodations.
- Ensuring compliance by Regional and Office Directors, other supervisors and managers, and OHR responsible staff with the policies and guidelines outlined in this instruction.
- Responding to external reviews of agency reasonable accommodation programs.

F. **Each employee is responsible for:**

- Notifying designated agency officials of any impairment that may interfere with the performance of essential duties; and making the request for reasonable accommodations.
- Cooperating with management's efforts to explore, identify and monitor reasonable accommodation options.
- Providing the agency with timely, accurate and complete medical and other information necessary to make determinations regarding the reasonable accommodation request.
- Updating his/her Official Personnel Folder by submitting an OPM Self-Identification, Standard Form 256 to the Office of Human Resources for any impairment. Submission of the form is optional; however submitting the form assists the agency in monitoring and reporting on agency affirmative employment programs.

G. **The Disability Program Manager (DPM) in the Office of Minority and Women Inclusion is responsible for:**

- Providing consulting services to NCUA employees and managers regarding procedures for administering reasonable accommodations policies.
- Recording and tracking all accommodations as required by this instruction.

H. **The Office of the Chief Financial Officer Division of Procurement and Facilities Management is responsible for:**

- Ensuring agency buildings, restrooms, conference rooms, ramps, doorways and other architectural features are accessible.

I. **The Office of Continuity and Security Management is responsible for:**

- Ensuring agency evacuation and security procedures include provisions for employees with disabilities.

7. **PROCEDURES.**

The reasonable accommodation process begins as soon as the request for accommodation is made either orally or in writing. The request does not have to use any special words, such as “reasonable accommodation”, “disability”, or “Rehabilitation Act.” An individual with a disability may request a reasonable accommodation at any time, even if they have not previously disclosed the existence of a disability. Each request requires a response, but does not necessarily mean the employer is required to provide the accommodation.

A. **Involved Parties.**

- 1) **Employee.** An employee may request a reasonable accommodation orally or in writing from his/her supervisor, another supervisor or manager in his/her immediate chain of supervision, the Regional or Office Director, the Director of Management Services, the Disability Program Manager, or the Selective Placement Program Coordinator. The official contacted will notify the DPM within one to three business days of the request. The DPM will coordinate the request with the appropriate decision-maker.
- 2) **Applicant.** Applicants may request a reasonable accommodation orally or in writing from the DPM, the SPPC, or the NCUA staff with whom they have contact. The contacted staff will notify the SPPC within one to three business days of the request. The SPPC will coordinate the request with the appropriate decision-maker, and the DPM as necessary.

- 3) **Representative.** A family member, health professional, or other representative may request an accommodation on behalf of an NCUA employee or applicant. The official contacted will notify the DPM of the request within one to three business days. The DPM will contact the representative and where necessary, confirm the request with the employee.
- B. **Recurring and Ongoing Reasonable Accommodations.** An employee needing the same reasonable accommodation on a recurring basis must submit the enclosed *NCUA Form 1686 - Reasonable Accommodation Form - Part A Reasonable Accommodation Request* only for the first request. The employee requesting accommodation, however, must give appropriate advance notice (five to ten business days) each subsequent time the accommodation is needed. When the accommodation is needed on a regular basis (e.g., a weekly staff meeting), the employee should submit the request to a supervisor or office director. The DPM should ensure that an employee's supervisor makes the appropriate arrangements. In addition, the employee's supervisor or office director must provide the DPM with confirmation of the request.
- C. **Written Requests for Record Keeping Purposes.** Any individual who is requesting accommodations should complete the enclosed *NCUA Form 1686 - Reasonable Accommodation Form - Part A Reasonable Accommodation Request*, and forward the form and any relevant documents to the DPM. While written request is preferable, it is not required. If an individual with a disability requires assistance with this requirement, the staff member receiving the request will direct the person to the DPM.
- D. **Determining the Decision-Maker.** The NCUA official who receives the request must determine who will be responsible for deciding upon the request and forward it, if necessary, to that person within five business days of receiving the request. The person who makes the determination about the request for accommodation will be referred to as the "decision-maker."
 - 1) For accommodation requests from employees, the decision-maker will be the Regional Director or Office Director and may be delegated to supervisors.
 - 2) For accommodation requests from applicants, when the request is made prior to the interview, the decision-maker will be the OHR Director. When the request is made at the time of interview or later, the decision-maker will be the delegated official of the office. Decision-makers must designate acting decision-makers when they are not available to ensure the time frames are met.

The DPM, Directors of Management Services, and Employee Relations Specialists will be available to assist in the decision-making process. The decision-maker may also want to refer to the enclosed *Reasonable Accommodation Resource List* for suggested resources.

- E. **The Interactive Process.** Once the decision-maker receives a request, the parties should begin the interactive process to determine what, if any, accommodation should be

provided. This means that the individual requesting the accommodation, the supervisor or personnel management specialist, and the NCUA decision-maker must talk to each other about the request, the process for determining whether an accommodation will be provided, and any potential accommodation.

- 1) **Purpose.** The interactive process allows the decision-maker the ability to assess the employee's limitations against the performance of the essential functions of the job. The interactive discussion is imperative to the reasonable accommodation process and must be conducted. Decision-makers should focus only on exploring accommodation options, performance or conduct issues should not be discussed in this process.
- 2) **Prior to the Discussion.** The decision-maker will contact the requestor to acknowledge the receipt of the request and set up a time to conduct the interactive discussion. Managers should review the job description and determine the essential functions of the position, the amount of time spent on performing job functions, how they are performed (as distinguished from marginal functions) including:
 - Physical requirements for performing the job,
 - Behavioral characteristics essential for job performance,
 - Marginal functions not essential to job performance, and
 - Minimum qualification requirements essential for the position.

If required, and prior to the meeting, the decision-maker should ask the employee to forward a completed *NCUA Form 1686 - Reasonable Accommodation Form: Part A Reasonable Accommodation Request* to the DPM, along with the following:

- Documentation from a medical professional describing the impairment.
 - A professional medical opinion that describes the impact of the disability on the employee's ability to perform each essential function of the job.
 - Suggestions of reasonable accommodations for the performance of the essential functions affected or impacted by the employee's disability.
 - The decision-maker should inform the requestor that this information may be needed before a final determination can be made on the reasonable accommodation request.
- 3) **During the Discussion.** The NCUA decision-maker will:
 - a) Explain the decision-maker's role in the process;

- b) Explain the agency's responsibility to provide reasonable accommodation in accordance with the Rehabilitation Act;
 - c) Inform the requestor that he/she may be required to provide medical documentation to support the need for the accommodation requested;
 - d) Explain that the requestor's medical information will be kept confidential, but may be reviewed by staff who have a need to know; and
 - e) Discuss all options for accommodations and inform the requestor of any temporary accommodations available. The decision-maker should ask the employee what limitations or barriers are being experienced, what specific job tasks or equal opportunities are impacted by the limitations or barrier, and how those limitations could be overcome with a reasonable accommodation. The decision-maker should also be prepared to explore alternative accommodations with the employee, such as disability retirement.
- 4) **After the Discussion.** The decision-maker must document the discussion and provide a description of what was discussed on the attached *NCUA Form 1686 - Part C Reasonable Accommodation Reporting Form*.
- 5) **Requesting Medical Documentation.** In order to provide an effective accommodation, the agency must first determine whether the individual has a disability under the Rehabilitation Act, as amended. When the disability is known and the accommodation is obvious, the agency may not need to seek additional medical information. The agency will only request information sufficient to substantiate that the individual is entitled to the accommodation requested. The types of medical information or documentation that may be requested are the following:
- The past, present, and expected continuing nature, severity and duration of the impairment, e.g., functional limitations, symptoms, side effects or any treatments.
 - The activities the impairment limits;
 - The extent of the limitations;
 - The reason(s) the requestor requires a reasonable accommodation, and how it will assist the requestor in performing the essential functions of the job, applying for employment or enjoying a benefit in the work environment; and
 - Suggestions for reasonable accommodations from the individual's medical provider.
- 6) **Reviewing and Analyzing Requests for Reasonable Accommodation.** All requests for medical documentation should be directed to the DPM. The DPM will

review and evaluate medical documentation to determine its adequacy. Using a limited release signed by the requestor, the DPM may consult with the requestor's medical provider or a health practitioner chosen by NCUA, if necessary. After determining the sufficiency of the medical documentation, the DPM will review the completed reasonable accommodation request and provide suggestions or recommendations to the decision-maker.

If after receiving the information from the requestor, the agency determines it to be insufficient to decide on an effective accommodation, the decision-maker may request further information by any of the following options:

- By providing a standard memo to the requestor explaining why the information provided is insufficient, what additional information is needed, and why it is necessary for a reasonable accommodation determination. The requestor may decide to seek information from a medical provider.
- By asking the requestor to sign a limited release allowing NCUA or its contracted medical consultant to contact the individual's health care provider either directly or by submitting a list of specific questions.
- By using a health practitioner, chosen by NCUA to examine the requestor. This option is only available after the requestor received written notification regarding the insufficient information. Further, NCUA will cover the expense of the health practitioner.

Failure to provide appropriate documentation or to cooperate with NCUA's efforts to obtain such documentation can result in a denial of the reasonable accommodation request.

7) **Confidentiality Requirements Regarding Medical Information Obtained in the Reasonable Accommodation Process.** Under the Rehabilitation Act of 1973, as amended, medical information obtained in connection with the reasonable accommodation process, including information about functional limitations and reasonable accommodation needs must be kept in files separate from the individual's personnel file.

- a) NCUA employees who obtain or receive such information are strictly bound by these confidentiality requirements.
- b) Medical information required for making job-related decisions will be provided to only those management officials with a demonstrated "need to know" in accordance with the Rehabilitation Act and its amendments.
- c) All records obtained or created during the processing of a request for reasonable accommodation, including medical records, will be kept by the DPM and will be

maintained in accordance with the Privacy Act and the requirements of 29 CFR Part 1611.

- d) Nondisclosure of the Genetic Information and Nondiscrimination Act of 2008 (GINA) Protected Information: GINA prohibits employers and other entities covered by GINA Title II from requesting, requiring, or purchasing genetic information of employees or their family members, except as specifically allowed by this law. To comply with GINA, the request for medical information must state that the agency is asking that genetic information not be provided when responding to the request for medical information.

8) **Time Frames for Processing Requests and Providing Reasonable**

Accommodations. NCUA will process requests for reasonable accommodation and provide accommodations, where they are appropriate, within 20 business days. The clock starts when the requestor initiates his/her request, regardless of the method used (oral, email, written). The time necessary to process a request will depend on the nature of the accommodation requested and the receipt of sufficient supporting information.

- a) **Decision within 20 Business Days.** If a request for an accommodation does not require medical documentation and there are no extenuating circumstances, the decision-maker will process the accommodation request and provide a decision within 10 business days from the date the request is received, or sooner if possible. Since decision-makers may need the full 20 days to engage in the interactive process and collect all relevant information about possible accommodations, they should not delay beginning this process. Failure to meet this time frame solely because a decision-maker delayed processing the request is not an extenuating circumstance.

An example of an accommodation which can be easily provided within the 10-day time frame includes an employee with diabetes who sits in an open area and requests breaks during the day to test her blood sugar.

- b) **Expedited processing.** There are two circumstances in which a request for reasonable accommodations requires an expedited review and decision. The two circumstances are discussed below:

- **To enable an individual to apply for a job.** This includes applying for a job, communicating with agency hiring officials, attending an interview, and testing. Depending on the timetable for receiving applications, conducting interviews, and making hiring decisions, there may be a need to expedite a request for reasonable accommodation to ensure that an applicant or employee with a disability has an equal opportunity to participate in the employment process.

- **To enable an individual to engage in an agency activity that is scheduled to occur shortly.** This includes attending a meeting, training program, agency functions, etc. In these cases, there may be a need to expedite a request for reasonable accommodation to ensure that an employee with a disability has equal opportunity in the workplace.
- 9) **Time Stops for Medical Documentation.** The decision period is suspended when the agency believes that it is necessary to obtain medical information to determine whether the requesting individual has a disability and/or to identify the functional limitations, the agency will request the medical information as soon as possible after his or her receipt of the request for accommodation, but before the expiration of the 20 business days. The need for documentation may occasionally not become apparent until after the interactive process has begun.
 - 10) **Time Starts upon Receipt of Medical Documentation.** Upon receipt of acceptable medical documentation, the DPM will review and evaluate the documentation, and consult with the appropriate agency representatives and, if necessary, forward the medical documentation to the agency's medical consultant for review. A decision will be provided within the remaining number of business days from the date the time was frozen due to the request for medical documentation, absent any extenuating circumstances as described below.
 - 11) **Extenuating Circumstances.** An extenuating circumstance covers limited situations in which unforeseen or unavoidable events prevent prompt processing and delivery of an accommodation. These factors could not be reasonably anticipated or avoided prior to submitting the accommodation request.

When extenuating circumstances are present, the time for processing an accommodation request and providing the accommodation is extended as reasonably necessary. It is NCUA's policy that extensions based on extenuating circumstances should be limited to circumstances where they are strictly necessary. All NCUA staff are expected to act as quickly as reasonably possible in processing requests and providing accommodation. NCUA may not delay processing or providing an accommodation because a particular staff member is unavailable.

Where extenuating circumstances are present, the decision-maker must provide the requestor a written explanation for the delay, and the approximate date on which a decision, or provision of the reasonable accommodation, is expected. Any further developments or changes should also be communicated promptly to the individual.

The following are examples of extenuating circumstances:

- a) There is an outstanding initial or follow-up request for medical information, or the medical consultant is evaluating medical information, which has been provided.

- b) The purchase of equipment may take longer than 20 business days because of regulatory or other requirements.
 - c) Equipment must be backordered, the vendor typically used by NCUA for goods or services has unexpectedly gone out of business, or the vendor cannot promptly supply the needed goods or services and another vendor is not immediately available.
 - d) The employee with a disability needs to try working with equipment on a trial basis to ensure that it is effective before NCUA buys it.
- 12) **When Accommodations are Delayed.** If there is a delay in providing an approved accommodation, the decision-maker must investigate whether temporary measures can be taken to assist the employee. If a delay is attributable to the need to obtain or evaluate medical documentation and NCUA has not yet determined that the individual is entitled to an accommodation, NCUA may also provide an accommodation on a temporary basis.

In such a case, the decision-maker will notify the individual in writing that the accommodation is being provided on a temporary basis pending a decision on the accommodation request. NCUA decision-makers who approve such temporary measures are responsible for assuring that they do not take the place of a permanent accommodation and that all necessary steps to secure the permanent accommodation are being taken.

- 13) **Granting a Reasonable Accommodation Request.** The decision-maker should immediately notify the applicant or employee when the accommodation request is granted. The decision-maker will also complete the enclosed *NCUA Form 1686 - Part D Decision of Request for Reasonable Accommodation*. If the accommodation cannot be provided immediately, the decision-maker must inform the individual of the projected time frame for providing the accommodation.
- 14) **Denial of Reasonable Accommodation Request.** When an accommodation request is denied, the decision-maker must complete *NCUA Form 1686 - Part E Denial of Reasonable Accommodation Request* and provide a copy to the individual who requested the accommodation. The explanation for denying the accommodation should be written in plain language, clearly stating the specific reasons for the denial.

Where the decision-maker has denied a specific requested accommodation, but offered an alternative accommodation not agreed to during the interactive process, the denial notice should explain both the reasons for the denial of the requested accommodation and the reasons that the decision-maker believes that the chosen accommodation will be effective.

Reasons for denying the accommodation request may include the reasons listed below. However, each reason must include a detailed explanation for denying the request. (For example, why the accommodation would not be effective or why it would result in undue hardship).

- a) The requested accommodation would not be effective.
- b) Providing the requested accommodation would result in undue hardship. Before making an “undue hardship” determination, the decision-maker must have explored whether other effective accommodations exist which would not impose undue hardship and therefore can be provided. The decision-maker should also consult with the Disability Program Manager. A determination of undue hardship means that NCUA finds that a specific accommodation would result in *significant* difficulty or expense, or would *fundamentally* alter the nature of NCUA’s operations.
- c) Medical documentation is inadequate to establish that the individual has a disability and/or needs a reasonable accommodation.
- d) The requested accommodation would require the removal of an essential function.
- e) The requested accommodation would require the lowering of a performance or production standard.

In addition, the written notice of denial informs the individual that he or she has the right to file an EEO complaint or may have rights to pursue a Merit Systems Protection Board (MSPB) appeal, or negotiated grievance under the Collective Bargaining Agreement (CBA), Section 33, and Article 6. The notice also explains NCUA’s procedures available for informal dispute resolution.

- 15) **The Mediation Program.** An individual who is denied accommodations or is offered an alternative accommodation may request to participate in the Mediation Program. This informal process does not affect the time frame for instituting proceedings under the EEO procedures set forth under Title 29 CFR, Part 1614 or any other dispute resolution process. To initiate the EEO process, the employee must contact the OMWI EEO Intake Line at (703)518-6325 within 45 days of receiving the last denial letter. The deadline to initiate the EEO process begins on the date of the last denial letter issued.
- 16) **Reassignments.** There are specific considerations in the interactive process when responding to a request for reassignment. Reassignment is a form of reasonable accommodation that must be provided, absent undue hardship, to an employee who, because of a disability, can no longer perform the essential functions of the position he or she holds, with or without reasonable accommodation. Reassignment is a "last resort" accommodation that must be considered if there are no effective

accommodations which would enable the employee to perform the essential functions of his/her current job, or if all other possible accommodations would impose undue hardship.

- a) Reassignment is available only to employees and not to applicants. In addition, reassignment may be made only to a vacant position. The law does not require that agencies create new positions or move employees from their jobs in order to create a vacancy.
 - b) In considering where there are positions available for reassignment, the decision-maker will work with OHR and the individual requesting the accommodation to identify:
 - All vacant positions within the agency for which the employee may be qualified, with or without reasonable accommodation; and
 - All positions which OHR has reason to believe will become vacant over the next 60 business days and for which the employee may be qualified. The agency will first focus on positions that are equivalent to the employee's current job in terms of pay, status, and other relevant factors. If there is no vacant equivalent position, NCUA will consider vacant lower level positions for which the individual is qualified.
 - c) Reassignment may be made to a vacant position outside of the employee's commuting area if the employee is willing to relocate. As with other transfers not required by management, NCUA is not obligated to pay for the employee's relocation costs.
- 17) **Reconsideration.** If an individual wishes reconsideration, he or she should first ask the decision-maker to reconsider the decision. The individual may present additional information in support of his/her request. The decision-maker will respond to the request for reconsideration within 20 business days. An individual's participation in the informal dispute resolution processes does not satisfy the requirements for bringing a claim under EEO or MSPB.
- 18) **Information Tracking and Reporting.** The decision-maker will ensure the enclosed *NCUA Form 1686 Reasonable Accommodation Information Reporting Form* is properly completed, signed, and submitted to the DPM within ten business days of the decision. Copies of all information, including medical information received as part of processing the request, should be attached. The DPM will maintain these records for the longer of the employee's tenure with NCUA or five years. The DPM will maintain statistics for reporting purposes to include the following:
- a) The number of reasonable accommodations, by type, that have been requested in the application process and whether those requests have been granted or denied.

- b) The jobs (occupational series, grade level, and organization location) for which reasonable accommodations have been requested.
- c) The types of reasonable accommodations that have been requested for each of those jobs.
- d) The number of reasonable accommodations, by type, for each job that have been approved, and the number of accommodations, by type, that have been denied.
- e) The number of requests for reasonable accommodations, by type, that relate to the benefits or privileges of employment, and whether those requests have been granted or denied.
- f) The reasons for denial of requests for reasonable accommodation.
- g) The amount of time taken to process each request for reasonable accommodation.
- h) The sources of technical assistance that have been consulted in trying to identify possible reasonable accommodations.

19) **Relationship of Procedures to Statutory Claims.** This policy is in addition to statutory protections for persons with disabilities and the remedies they provide for the denial of requests for reasonable accommodation. Requirements governing the initiation of statutory claims, including time frames for filing such claims, remain unchanged.

An individual who chooses to pursue statutory remedies for denial of reasonable accommodation may choose one of the following options:

- a) For an EEO complaint, contact NCUA's OMWI EEO Intake Line at (703) 518-6325 within 45 days from the date of receipt of the written notice of denial.
- b) For an MSPB appeal, initiate an appeal to the MSPB within 30 days of an appealable adverse action as defined in Title 5 CFR 1201.3.

If a member of the OMWI staff has had any involvement in the processing of the request for reasonable accommodation, that staff member shall be recused from any involvement in the process of an EEO complaint in connection with that request, where possible.

8. **EFFECTIVE DATE.**

This instruction is effective immediately and will remain in effect until cancelled or superseded.

/S/
Mark A. Treichel
Executive Director

OMWI/EEO

Reasonable Accommodation Resource List

1. **Department of Defense Computer/Electronic Accommodations Program (CAP).** As a partnership agency, CAP provides FREE assistive technology and accommodations to support individuals with disabilities in accessing information and communication technology. The Disability Program Manager, which is located in NCUA's Office of Minority and Women Inclusion is the point of contact and can be reached at (703)518-6325.
 - (703)-681-8813 (Voice/TTY).
 - <http://www.cap.mil/Default.aspx>
2. **U.S. Equal Employment Opportunity Commission.** Provides managers and supervisors reasonable accommodation guidance.
 - 1-800-669-3362 (Voice)
 - 1-800-800-3302 (TTY)
 - http://www.eeoc.gov/laws/types/disability_guidance.cfm
3. **Job Accommodation Network (JAN).** JAN provides free consulting services for federal employers, including one-on-one consultation about all aspects of job accommodations, compliance assistance with section 501 of the Rehabilitation Act, information about federal initiatives and hiring programs, and referral to federal resources. For accommodation ideas, search JAN's database (SOAR) at <http://askjan.org/soar/disabilities.html>
 - 1-800-232-9675 (Voice/TTY)
 - <http://askjan.org/empl/index.htm#fed>
4. **ADA Disability and Business Technical Assistance Centers (DBTACs).** The Mid-Atlantic ADA Center provides information, guidance and training on the Americans with Disabilities Act (ADA), tailored to meet the needs of businesses, government entities, organizations, and individuals in the Mid-Atlantic Region.
 - 1-800-949-4232 (Voice/TT)
 - <http://www.adainfo.org/>
5. **Disability.gov.** A federal government website for information on disability programs and services nationwide.
 - <https://www.disability.gov>
6. **FEDS.** FEDS is an assembly of current, former, and retired federal employees and people with disabilities, who have an interest in improving the federal governments rate of employing, retaining, and advancing people with disabilities.
 - <http://www.fedsfirst.com/>
7. **RESNA Technical Assistance Project.** RESNA is the premier professional membership organization dedicated to promoting the health and well-being of people with disabilities through increasing access to technology solutions.
 - (703) 524-6686 (Voice)
 - (703) 524-6639 (TTY)
 - <http://www.resna.org/>

PART A

REASONABLE ACCOMMODATION REQUEST FORM

{For NCUA Record Keeping Purposes}

Log No. _____

I. REQUESTOR'S INFORMATION

Please check one:

☐Employee

☐Applicant

1) Name:

2) Telephone number where you can be reached:

3) Email Address:

4) Mailing Address:

5) Employee Title/Series/Grade:

6) Employee's Office and Supervisor's Name or Location of Vacancy:

7) Date of Request:

8) Medical Documentation:

☐Attached

☐Previously provided

☐Will follow

The Agency may require reasonable information/documentation where the disability and/or need for accommodation is not obvious or otherwise known.

1) Reasonable Accommodation needed for: (Check one)

☐ Application Process

☐ Performing Job Functions or Accessing the Work Environment

☐ Accessing a Benefit or Privilege of Employment (e.g., attending a training program or social event):

2) Describe the reasonable accommodation you are requesting?

3) I have a mental or physical impairment described as:

4) My mental or physical impairment substantially limits the following major life activity(ies):

Requestor's Signature

Date

PART B

REQUEST FOR MEDICAL INFORMATION

I. Personal Information

- 1) Name of Employee:
- 2) Name of Medical Provider:
- 3) Address of Medical Provider:
- 4) Telephone Number of Medical Provider:

II. Questions to help determine whether an employee has a disability.

- 1) What is the physical or mental impairment?
- 2) How does the employee's limitation(s) interfere with his/her ability to perform the job function(s) or access a benefit of employment?
- 3) What major life activity (s) (includes major bodily functions) is/are affected?

III. Questions to help determine effective accommodations options.

If an employee has a disability and needs an accommodation because of the disability, the employer must provide a reasonable accommodation, unless the accommodation poses an undue hardship. The following questions may help determine effective accommodations:

- 1) Do you have any suggestions regarding possible accommodations to improve job performance or accessing benefits of employment?**

- 2) How would your suggestions improve the employee's job performance, or help the employee/applicant enjoy benefits of employment?**

IV. Other comments.

Medical Professional's Signature

Date

Privacy Act Statement

The Rehabilitation Act of 1973, 29 U.S.C. section 791, and Executive Order 13164 authorize collection of this information. The primary use of this information is to consider, decide, and implement requests for reasonable accommodation. Additional disclosures of the information may be: To medical personnel to meet a bona fide medical emergency; to another Federal agency, a court, or a party in litigation before a court or in an administrative proceeding being conducted by a Federal agency when the Government is a party to the judicial or administrative proceeding; to a congressional office from the record of an individual in response to an inquiry from the congressional office made at the request of the individual; and to an authorized appeal grievance examiner, formal complaints examiner, administrative judge, equal employment opportunity investigator, arbitrator or other duly authorized official engaged in investigation or settlement of a grievance, complaint or appeal filed by an employee.

The Genetic Information Nondiscrimination Act of 2008 (GINA)

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when responding to this request for medical information. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

PART C

REASONABLE ACCOMMODATION REPORTING FORM

Log No. _____

Enter the following information about the employee or applicant who requested the reasonable accommodation:

- 1) Requester's Name:**
- 2) Office & Location:**
- 3) Current position or, if an applicant, desired position of the individual requesting Reasonable Accommodation (including position title, series, grade level, and office):**
- 4) Reasonable Accommodation:**

☐ **Approved (See Part D)** ☐ **Denied (See Part E for further rights)**
- 5) Date Reasonable Accommodation recommended:**
- 6) Date Interactive Discussion held:**
- 7) Name & Title of person who received initial request:**
- 8) Date Reasonable Accommodation request referred to Decision Maker:**
- 9) Name & Title of Decision Maker:**
- 10) Date Reasonable Accommodation approved or denied:**
- 11) Date Reasonable Accommodation provided:**
- 12) If time frames outlined in the Reasonable Accommodation Procedures were not met, please explain why:**

13) Type(s) of reasonable accommodation provided (if different from what was requested):

14) Comments.

Decision-Maker Signature

Date

Disability Program Manager Signature

Date

Privacy Act Statement

The Rehabilitation Act of 1973, 29 U.S.C. Section 791, and Executive Order 13164 authorize collection of this information. The primary use of this information is to consider, decide, and implement requests for reasonable accommodation. Additional disclosures of the information may be: To medical personnel to meet a bona fide medical emergency; to another Federal agency, a court, or a party in litigation before a court or in an administrative proceeding being conducted by a Federal agency when the Government is a party to the judicial or administrative proceeding; to a congressional office from the record of an individual in response to an inquiry from the congressional office made at the request of the individual; and to an authorized appeal grievance examiner, formal complaints examiner, administrative judge, equal employment opportunity investigator, arbitrator or other duly authorized official engaged in investigation or settlement of a grievance, complaint or appeal filed by an employee.

The Genetic Information Nondiscrimination Act of 2008 (GINA)

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when responding to this request for medical information. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

PART D

DECISION OF REQUEST FOR REASONABLE ACCOMMODATION

This document will comprise of details of the granted accommodation for the individual.

PART E

DENIAL OF REASONABLE ACCOMMODATION REQUEST

1) Name of Individual requesting reasonable accommodation:

2) Type(s) of reasonable accommodation requested:

3) Request denied because: (May check more than one box)

☐Accommodation Ineffective

☐Accommodation Would Cause Undue Hardship

☐Medical Documentation Inadequate

☐Accommodation Would Require Removal of an Essential Function

☐Accommodation Would Require Lowering of Performance or Production Standard

☐Other (Please identify) _____

4) Detailed Reason(s) for the denial of reasonable accommodation.

5) If the individual proposed one type of reasonable accommodation which is being denied, but rejected an offer of a different type of reasonable accommodation, explain both the reasons for denial of the requested accommodation and why you believe the chosen accommodation would be effective.

6) If an individual wishes to request reconsideration of this decision, he or she may take the following steps:

a) The individual may seek review of the decision by submitting a request to the Director of the Office of Minority and Women Inclusion (OMWI). The OMWI

Director will forward within three (3) business days the request to the next-level official in the decision-maker's chain of command who was not involved in the processing of the original request. The applicant or employee must seek such review within five (5) business days of receipt of the written decision.

- b) Absent extenuating circumstances, the reviewing official should render a decision within five business days of receipt of the request.**
- 7) An individual who chooses to pursue statutory remedies for denial of reasonable accommodation may choose one of the following options:**
 - a) For an EEO complaint, contact NCUA's Office of Minority and Women Inclusion's Intake Line at 703-518-6325 within 45 days from the date of receipt of the written notice of denial.**
 - b) For a collective bargaining claim, file a written grievance in accordance with the provisions of the Collective Bargaining Agreement; or**
 - c) To file an appeal with the Merit Systems Protection Board (MSPB), the appeal must be initiated within 30 days of an appealable adverse action as defined in Title 5 CFR 1201.3.**

Decision-Maker Signature

Date

Disability Program Manager Signature

Date

Tab 15

Mediation Program

Scope

The Mediation Program will address workplace disputes between employees or between employees and supervisors/managers. The types of disputes covered under the Mediation Program may be types that can be addressed in other forums, as well as those for which there lacks a formal resolution or administrative process. As such, employees may generally seek mediation for discrimination or harassment allegations, matters that may be grieved under the negotiated grievance process or the administrative grievance procedures, as well as non-EEO or non-grievance related disputes.

The Intake Process

1. Mediation Request: An employee who is seeking informal resolution of a workplace dispute may request to participate in the Mediation Program. The written request for mediation must be filed with the Equal Opportunity Programs office. (Appendix A)
2. Intake Process: Employees who request to participate in the Program will initially go through an intake process. During intake, program staff will provide information about the mediation process, collect the Mediation Request Form, provide information about other dispute resolution processes and determine whether mediation through the Mediation Program will be offered. The intake process should be completed in 2 workdays.
3. Provide Information About Other Processes: In addition to discussing the mediation process, the Mediation Coordinator or other program staff will inform the employee that except for grievances filed under the Collective Bargaining Agreement (CBA), contacting or using the Mediation Program to resolve a dispute **does not suspend the filing requirements** for other dispute resolution processes. While mediation is an expeditious process, the Mediation Program cannot guarantee that the mediation process will be completed prior to the expiration of the filing deadlines for other dispute resolution processes. Therefore, it is incumbent on employees to take the action necessary to preserve their rights.
4. The Mediation Coordinator will provide the employee with a written notice of the filing requirements for the other dispute resolution processes and their rights and responsibilities under those processes. The employee must sign a copy of the

notice upon receipt. The notice and Mediation Coordinator will address the following:

EEO Process. Applicants or employees who believe that they have been discriminated against on the basis of their race, color, religion, national origin, gender, age (40 and over), disability, genetic information, or in reprisal for protected EEO activity **must contact EOP Intake or an EEO Counselor within 45 days** of the date of the alleged discrimination. In order to avoid confusion on the part of employees and help ensure that employees do not miss the deadline for contacting an EEO Counselor, **individuals will be advised that requesting mediation under the Mediation Program does not satisfy the requirement to contact an EEO Counselor within 45 days of the date of the alleged discrimination.** Accordingly, individuals wishing to pursue the EEO complaint process must initiate the EEO informal process (contact with EOP or Counselor) within 45 days.

Those individuals wishing to pursue an EEO complaint who seek mediation under the NCUA's "EEO Alternative Dispute Resolution (ADR) Program for EEO Issues," NCUA Instruction 1270.05, will be advised that the informal counseling period will be extended to 90 days. In the event the matter is not resolved in the mediation process within that time period, the individual will be given a final interview by the EEO Counselor and informed of the right to file a formal complaint. Similarly, those individuals who have a formal EEO complaint pending and request mediation under NCUA Instruction 1270.05 will be notified that, if mediation is approved, the time period for completing an ongoing investigation of an EEO complaint may be extended up to an additional 90 days. See 29 C.F.R. §1614.108(e).

Negotiated Grievance Process. Under the Collective Bargaining Agreement (CBA) between NCUA and the National Treasury Employees Union, a grievance (as defined in CBA Article 31) will be deemed filed when the employee's immediate supervisor receives the completed Grievance Form. A grievance concerning a particular action or occurrence must be filed within 15 business days after the date the employee knew or should have known of the action or occurrence. Failure to timely file a grievance shall be deemed a waiver of the right to grieve the particular action or occurrence. The grievant is allowed a single opportunity, consisting of three business days from the date of filing, to correct any citation or quotation errors and to resubmit the grievance. The time frame for filing a grievance is tolled for individuals seeking mediation under the Mediation Program.

If a bargaining unit employee intends to file a grievance under the CBA, s/he may request to participate in the Mediation Program in an attempt to resolve the dispute at the lowest possible level. **Use of the Mediation Program to resolve a dispute suspends the time frame for filing a grievance at step 1 of the negotiated grievance procedure if the employee requests**

mediation under the Mediation Program prior to the deadline for filing a grievance. As such, the employee must make a request for mediation with EOP/Mediation Coordinator within 15 business days after the date the employee knew or should have known of the action or occurrence that may be grieved under the CBA Article 31. If mediation is disapproved or an approved mediation session does not resolve the matter, the employee may file a grievance in accordance with the CBA Article 31 within 15 business days after either the date the employee received the mediation denial or the date the mediation concluded.

Unfair Labor Practices. Employees eligible to seek redress for an unfair labor practice (ULP) under either the CBA Article 31 grievance process or through a filing with the Federal Labor Relations Authority (FLRA) may attempt to resolve the dispute through the Mediation Program prior to filing a ULP. However, participation in the Program does not suspend the time frames for filing a ULP under the FLRA regulations. To preserve their rights under the FLRA, employees must file a ULP within 6 months of the alleged incident. 5 U.S.C. 7118(a)(4)(A).

Administrative Grievance Process. Under Chapter 16 of the NCUA Personnel Manual, the Administrative Grievance System allows for an aggrieved employee to seek pre-grievance resolution of a problem. The time spent on seeking informal resolution is not counted against the 15-day time limit for filing an administrative grievance concerning a particular act or occurrence. If the workplace dispute is not resolved through the Mediation Program, the employee may pursue an administrative grievance pursuant to Chapter 16 of the Personnel Manual.

MSPB Process. Use of the Mediation Program to resolve a dispute does not automatically suspend the 30-day deadline for filing an appeal with the Merit Systems Protection Board (MSPB). However, individuals may attempt mediation prior to the expiration of that deadline. If the parties wish to continue mediation efforts beyond the 30-day deadline for filing an appeal, they must submit a written notice to the MSPB prior to the timely filing of an appeal, which explains that the parties are engaged in alternative dispute resolution efforts. The MSPB will then extend the time limit for filing an appeal by 30 days - for a total of 60 days. See 5 C.F.R. §§1201.22(b)(1)&(2).

Harassment Prevention Procedures. The Mediation Program may be used to resolve matters that have been raised under NCUA Instruction 1235.08, Prevention of Harassment in the Workplace. In appropriate cases, employees who contact the EOP Director about alleged harassment in the workplace will be asked if they are willing to use the Mediation Program to address the harassment. If the employee is not interested in mediation or the situation is not resolved under the Mediation Program, the EOP Director will resume the processes under NCUA Instruction 1235.08.

5. Determination of Eligibility for ADR: The Mediation Program is available to resolve various types of workplace disputes. For example, disputes involving an employee's working conditions, terms and conditions of employment, reasonable accommodation, personnel actions, and allegations of employment discrimination are common disputes and issues generally eligible for mediation.

A small number of issues and disputes are generally inappropriate for mediation and are not eligible for resolution under the Mediation Program, including:

- a. Issues under investigation by the Inspector General, the Office of Personnel Management (OPM), the Office of Special Counsel, or state and federal police agencies;
- b. Issues over which NCUA does not have jurisdiction, such as workers' compensation (Department of Labor), disability retirement (OPM), suitability determinations (OPM), and Thrift Savings Plan issues (Thrift Savings Plan Board);
- c. Cases of egregious misconduct (e.g., threats of violence);
- d. Issues that are the subject of an EEO class complaint;
- e. Disputes involving applicants for employment, except when the applicant has requested ADR during the EEO complaint process under 29 C.F.R Part 1614; and
- f. Other issues where compelling circumstances convince the Mediation Coordinator that mediation would not be appropriate or worthwhile.

In determining whether a matter is appropriate for the Mediation Program, the nature and complexity of the dispute, the relationship of the parties, and the relief sought by the parties will be taken into consideration.

The decision to accept or reject a dispute for the program will be made on a case-by-case basis. However, the Mediation Program will not accept matters that are clearly raised for a purpose other than to make a good faith effort to resolve a genuine employment dispute.

6. Participants in the Mediation Program:

The mediation session will include the parties involved in the dispute and the mediator or co-mediators. An employee has the right to choose his or her own representative if the employee so opts. The parties may also mutually agree to additional participants in the mediation, such as agency representatives or subject matter experts. Supervisors and managers are required to participate in the

mediation process if a dispute is accepted for resolution through the Mediation Program. The Mediation Coordinator will ascertain the management official(s) who should participate in the mediation, notify them that a dispute has been submitted to the Mediation Program and that the dispute has been accepted. The management official who has the authority to resolve the dispute should either attend the mediation session or be available by telephone during the session.

Both employees and their representatives, if he/she is a union official, are entitled to a reasonable amount of duty time (as appropriate) to participate in the mediation process. The employee or representative and the Mediation Coordinator, in consultation with the employee's or representative's supervisor, should arrive at a mutual understanding as to the amount of duty time to be used prior to the use of such time. An employee or representative who is in duty status is entitled to a reasonable amount of duty time, normally not to exceed two hours total, to draft a mediation request and prepare for a mediation session. Most mediations will conclude within one day. Duty time for this purpose must be requested, in advance, from the employee's or representative's immediate supervisor. If the request is denied, the supervisor will identify the time period, normally within one business day, when the employee or representative will be granted the requested duty time.

Prior to the mediation session, all participants will be asked to sign the Agreement to Mediate, Appendix B, and the Confidentiality Agreement, Appendix C.

The Mediation Process

The Mediation Coordinator¹, located in NCUA's Office of Equal Opportunity Programs, will assign an in-house mediator or, in the event of a scheduling conflict or conflict of interest, a mediator from the Shared Neutrals Programs, the Federal Executive Board, the Federal Mediation and Conciliation Service, or another contract mediator. All mediators must meet the minimum qualifications described in Chapter 3 of the EEOC's Management Directive (MD)-110. Those qualifications are: (1) at least 20 hours of basic mediation skills training; (2) at least 3 co-mediations with a qualified mediator or five independent mediations and positive evaluations from a qualified trainer/evaluator; and (3) at least two verifiable references from two qualified mediators or trainer/evaluators. Mediators must also possess knowledge of federal personnel procedures, policies and practices and the laws governing federal sector EEO.

The Mediation Coordinator/mediator will select a date to meet that is acceptable to all participants. Whenever possible, this date should occur within 15 calendar days of the agreement to mediate. Mediations may be conducted in-person, video-conference, or by telephone, if the Mediation Coordinator determines that mediation by video-conference or telephone is appropriate. If the management

¹ It is anticipated that the Mediation Coordinator will also serve as Mediator in most, if not all, mediation sessions depending on volume of mediation sessions and any potential conflicts of interest.

official and employee are not co-located within the same duty station, the meeting will be conducted by telephone or video-conference.

The parties will meet to attempt to resolve the issue until/unless the mediator determines that further progress is unlikely or until any party to the mediation submits written notice of withdrawal from the process. Employees can end the mediation process at any time in order to pursue a formal dispute resolution process.

If an agreement is reached, a settlement agreement is written, containing the terms of the agreement and the time frames for execution of the terms. The parties must sign and date the agreement. Certain settlement agreements, such as agreements involving personnel actions, may require approval by the Office of Human Resources or the Executive Director before they become final. The Mediation Coordinator will monitor the settlement agreement to ensure that the terms are fully complied with. In signing a settlement agreement, an employee waives his/her right to pursue the same dispute through a formal dispute resolution process.

Non-EEO Disputes - If a party believes that the other party has breached the settlement agreement, he/she should report the breach to the Mediation Coordinator within 30 days of when the party knew or should have known of the alleged breach. The Mediation Coordinator will investigate the allegation and, if appropriate, work with agency management to enforce the agreement.

EEO Disputes - If a party believes that the other party has breached a settlement agreement which was reached during the EEO complaint process, the aggrieved party should follow the procedures for breach of settlement agreements contained in 29 C.F.R. §1614.504. These procedures require a complainant to notify NCUA's Director of Equal Employment Opportunity, in writing, of the alleged breach within 30 days of when he/she knew or should have known of the breach. The complainant may request that the terms of the agreement be specifically implemented or that the complaint be reinstated for further processing, from the point processing ceased.

Program Principles

1. Participation in Mediation Program by NCUA employees is entirely voluntary. If an employee does not request to participate in the Mediation Program, NCUA will process grievances and complaints filed by employees under the applicable dispute resolution procedures in accordance with policy.

2. NCUA's Mediation Program will rely on a neutral mediator to facilitate resolution of the dispute. Neutrality will help maintain the integrity and effectiveness of the program. The mediator's duty is to be neutral, honest and to act in good faith. The mediator is an unbiased professional with no stake in the outcome of the mediation process. The mediator's sole function is to assist the parties in reaching an agreement to resolve the dispute themselves. If the parties resolve the dispute, the mediator assists the parties in drafting a settlement agreement, which becomes an enforceable contract. The mediator shall destroy all of his/her notes taken during the mediation or in preparation for the mediation.
3. The role of the parties is to present their versions of the dispute, their interests and to specify what is needed, from their perspective, to resolve the dispute and/or improve the working relationship. They must make a good faith effort to resolve the dispute. Each party should prepare for mediation by thinking about the causes of the dispute and how it can be resolved. Management officials should also determine prior to the mediation session their range of options to resolve the dispute. For instance, a manager should consult with agency experts, e.g. with OHR's Labor Relations, confidentially prior to mediation or during mediation caucus breaks, to expedite resolution.
4. Confidentiality in the proceedings must be maintained by the parties, subject to limited exceptions imposed by statute or regulation. This will enable parties to mediations to be forthcoming and candid, without fear that frank statements may later be used against them.
5. Settlement Agreements are enforceable. Once a settlement agreement has been approved and authorized by all of the appropriate parties, the settlement agreement is a legally binding contract that can be enforced by either party. Final settlement agreements between bargaining unit employees and the agency will be provided to NTEU in redacted form so as to not reveal the identities of the parties.
6. If the mediation efforts do not result in agreement, settlement offers or discussions will not be used as evidence or referred to in the related grievances or complaints.
7. An employee's request for mediation and subsequent participation in a mediation session shall not be construed as reflecting unfavorably on an employee's good standing, performance, loyalty, or desirability to the agency.

Implementation of Mediation Program

- o The NCUA Chairman, Partnership Council, EOP, and Mediation Coordinator will educate staff about the Mediation Program through emails, monthly newsletters, meeting minutes, personal inquiries, etc..

- o Managers who receive grievances may offer employees an opportunity to use the Mediation Program, as an alternative to the Step One meeting.
- o Participants in the Mediation Program will be required as a condition of participation to complete a short customer satisfaction survey.
- o The Mediation Coordinator will track the use of mediation, including acceptance rates, resolution rates overall and by mediator type, the average processing time of cases from the date the employee contacted the Mediation Program and monetary and non-monetary benefits obtained through the program.
- o The Partnership Council will review survey results, resolution rates, timeliness, and cost effectiveness as compared to the traditional dispute resolution processes at the conclusion of the program to determine effectiveness of program.

Tab 16



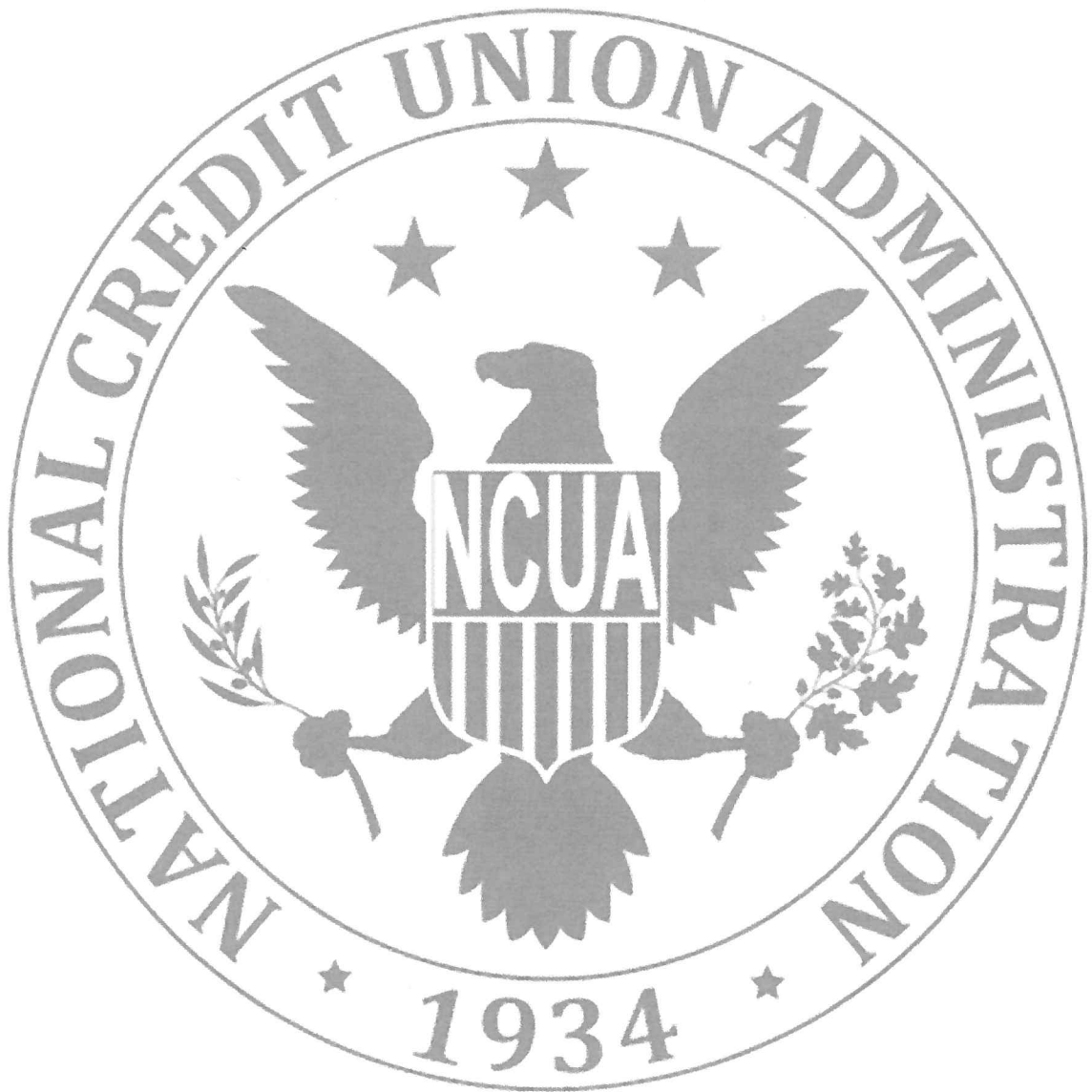
NCUA

National Credit Union Administration

Annual Federal Equal Opportunity Recruitment Program Fiscal Year 2018

December 31, 2018

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FY 2018 Plan Accomplishments

The National Credit Union Administration's (NCUA) current 2018-2022 Diversity and Inclusion Strategic Plan, and the accomplishments achieved in the plan were the result of an agency-wide collaborative effort. The plan includes five agency-wide goals, three of which relate to the NCUA's workforce. This plan expands and builds upon strategies and work begun under the agency's previous plan. Highlights of accomplishments toward these goals during 2018 include the following:

Goal 1: Workforce Diversity

- Provided diversity and inclusion training at regional meetings and subject matter expert forums
- Performed targeted recruitment outreach to underrepresented groups through social and print media and in-person recruiting events

Goal 2: Inclusion

- Launched an Employee Resource Group program and established one official group
- Identified and started organizing four (4) additional ERGs for proposed launch in 2019
- Launched the VIBE Campaign to build a more inclusive workplace by focusing on changing habits and behaviors
- Published a monthly diversity and inclusion newsletter for all agency staff

Goal 3: Equal Opportunity

- Updated EEO Systems, continued improvements to the EEO complaints filing system and reasonable accommodations program.

Promising Practices

Expanded Targeted Recruiting Efforts

Working collaboratively, the Office of Human Resources, the Office of Minority and Women Inclusion, and the NCUA Diversity Advisory Council continually develop ways to streamline the agency's recruitment efforts. In 2018, these efforts included the following recruitment and advertising channels:

- USAJOBS Resume Mining database
- Pathways Recent Graduate Program
- LinkedIn
- College Student "Handshake" Recruiting Tool Multi-year contract for



recruitment advertising in Professional Woman's Magazine, Hispanic Network Magazine, Black EOE Journal, U.S. Veterans Magazine, and DIVERSEability Magazine

- Recruiting targeted populations at career fairs such as Prospanica, National Association of the Deaf, and the Black National MBA Annual Conference and Exposition

VIBE Campaign

OMWI kicked off a new initiative called VIBE in March. The campaign is designed to assist the agency in achieving its strategic goal to cultivate an inclusive environment. The goal of the VIBE campaign is to improve the agency's culture by helping employees understand how they can make a conscious, deliberate effort to build an inclusive workplace. VIBE stands for:

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

The initiative includes components that educate NCUA staff, build cross-cultural awareness, influence positive perceptions and understanding, and ultimately lead to collectively building inclusive habits. The initiative is supported through events, employee "VIBES of the Month" highlighted in the monthly diversity and inclusion newsletter, and in other promotional materials.

Employee Resource Group Program

The NCUA established this new program during the beginning of the fiscal year. Since then, the agency has established one employee resource group, with several others launching in early or mid-2019.

Employee resource groups are voluntary, employee-led groups that serve as a resource for members and organizations within the agency by fostering a diverse, inclusive workplace aligned with organizational mission, values, goals, business practices, and objectives.

The groups give members opportunities to interact with each other and contribute to the agency's performance and work environment through the context of their cultural, professional, social, and experiential identities. Employee resource groups facilitate the creation and maintenance of a work culture and environment that recognizes, appreciates, and effectively encourages the use of the talents, skills, and perspectives of all employees in the achievement of the NCUA's mission.



Annual FEORP Plan for FY 2019

In 2019, the NCUA will continue working on additional strategies contained within the 2018-2022 Diversity and Inclusion Strategic Plan. The specific initiatives the organization plans to address in 2019 for each goal are:

Goal 1: Workforce Diversity

- Improve diversity and inclusion analytics and reporting
- Develop diversity and inclusion competencies in leadership
- Continue to expand recruitment and outreach to diverse populations

Goal 2: Inclusion

- Support current Employee Resource Groups and continue to launch additional groups
- Develop a revised leadership competency model for leaders that will define and encourage inclusive behaviors
- Support the NCUA's Diversity Advisory Council and provide comprehensive onboarding and orientation for new members
- Create a leadership toolkit to expand cross-cultural and inclusive leadership skills
- Incorporate diversity and inclusion training into leadership development program content

Goal 3: Equal Opportunity

- Benchmark and implement best practices for providing reasonable accommodations
- Improve processes and procedures for requesting and procuring reasonable accommodations
- Broaden Diversity Advisory Council members' role to include serving as an employee liaison to the Office of Minority and Women Inclusion

Strategic Activities Related to Hispanic Employment

The NCUA's Office of Human Resources and Office of Minority and Women Inclusion work collaboratively to support inclusive outreach efforts. In fiscal year 2018, the Office of Human Resources expanded its focus on social media channels and other virtual recruiting, while the Office of Minority and Women Inclusion led in-person recruitment and targeted print media outreach. The focus of these efforts was aligned with NCUA's main occupational requirements - the Credit Union Examiner - and the targeting of the Hispanic community.



Per Section 342 of the Dodd Frank Act, the OMWI performs targeted recruitment outreach to groups that show less than expected participation within its workforce when compared to the Civilian Labor Force. In a continuing effort to reach a diverse workforce, the Office of Minority and Women Inclusion targeted specific recruitment outreach venues to enrich the diversity of its applicant pool. The office participated in Prospanica (formally the National Society of Hispanic MBAs), which hosted over 300 vendors and thousands of participants who potentially have the skills necessary to be successful as an NCUA employee. Additionally, the Office of Minority and Women Inclusion placed a one-page recruitment advertisement in the Hispanic Network Magazine, the largest Hispanic/Latino circular in the nation.

Additionally, the NCUA posted all of its vacancy announcements on the following websites to ensure maximum distribution to the Hispanic and Latino communities:

- Latinojobs.org
- AllBilingualJobs.com
- AllHispanicJobs.com
- Latpro.com

Of the applications the NCUA received during the fiscal year, 79.3 percent disclosed race/ethnicity status. Figure 1 shows Hispanic applicants made up 9.1 percent of the applicant pool for the fiscal year 2018. Despite the drop in applications from Hispanics, the 11.9% selection rate suggests NCUA has been effective at attracting a highly qualified and diverse group. The data also shows the initial pool of Hispanic applicants reduced slightly to 8.9 percent at the qualified stage of the application process and then down to 7.1 percent at the referral stage. Notably, the selection stage of the process is 1.9 percentage points above the civilian labor force benchmark.



FY 2018 NCUA Applicant Flow Data

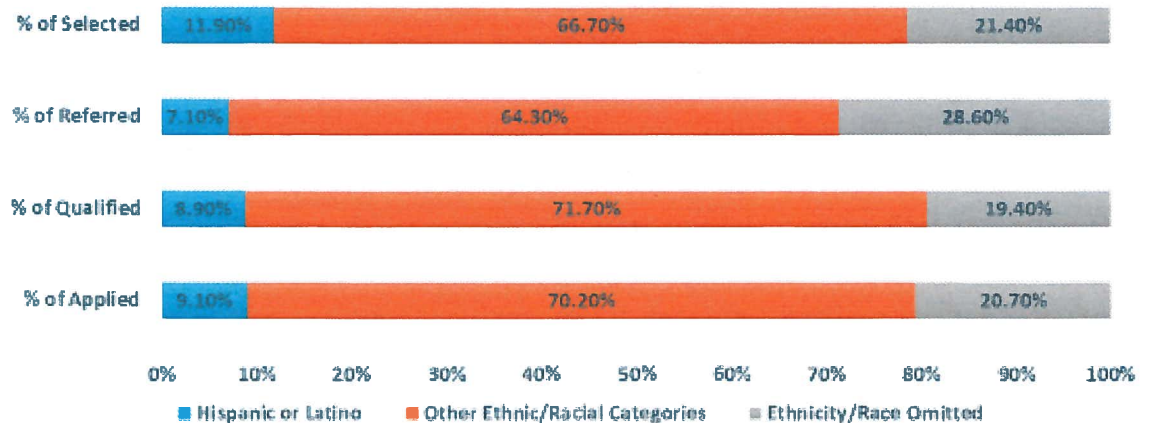


FIGURE 1: Percentage distribution of received applications¹
SOURCE: Office of Personnel Management

Strategic Activities Related to the Employment of People with Disabilities

The agency's onboard percentages for people with disabilities and targeted disabilities continues to surpass the federal goals. At the end of fiscal year 2018, the percentages at the NCUA for onboard staff with a reported disability and targeted disability were 12.79 percent and 3.06 percent, respectively.

Reasonable Accommodations

During the period of October 1, 2017 through September 30, 2018, the agency processed 58 reasonable accommodation requests. The majority of the

¹ This analysis differs from that required by the EEOC in its Management Directive 715 because it includes, in the calculation of percentages, applicants who omitted ethnic and/or racial and gender information in their applications.



accommodations consisted of requests for stand-up desks and CART (computer-assisted real time) service software.

Outreach and Recruitment Efforts

As prescribed by Executive Order 13548, NCUA's Office of Human Resources, The Office of Minority and Women Inclusion, and the agency's Diversity Advisory Council routinely collaborate throughout the year to ensure efficient resource allocation for targeted recruitment and outreach to people with disabilities. These efforts include the following:

- Maintaining an agency talent bank of Schedule A applicants, which includes disabled veterans who applied for positions within the agency
- Using the USAJOBS Resume Mining Database to search for highly qualified individuals with disabilities
- Using LinkedIn to expand outreach efforts to include following and joining diverse community groups to ensure maximum engagement and awareness of NCUA vacancies.
- Attending recruitment events and expositions targeting group that support people with disabilities.
- Using the Department of Labor's Workforce Recruitment Program (WRP) to find highly qualified individuals with disabilities and disabled veterans. The NCUA also provided volunteer recruiters to help interview and assess candidates for the WRP.

FY 2018 FEORP Progress Tracker

Type Agency Name Below (Replace Text)

Agency

Mentoring

Mentoring	Qualitative Questions (Text)	If "No" or "Other", please use this section to provide a detailed explanation.
Agency has a Formal Mentoring Program	Response	
	Yes	
Mentoring Training provided	Response	
	Yes	
Program is evaluated	Response	
	Yes	
Frequency of Program Evaluation (e.g. annual, semiannual, quarterly, other)	Response	
	Semiannual	
Feedback is provided	Response	
	Yes	
Program is announced to all qualified individuals	Response	
	Yes	
Agency collects demographic data of mentoring participants (Race, National Origin, Veteran, People with Disabilities, etc.)	Response	
	Yes	
Mentoring	Quantitative Questions (# or %)	
Percent of employees involved with mentoring in FY 2018	Response	/
	6.12%	
Percent of SES involved with mentoring in FY 2018	Response	/
	26.41%	
Percent of managers involved with mentoring in FY 2018	Response	/
	19.10%	
Percent of supervisors involved with mentoring in FY 2018	Response	/
	19.10%	
Count of employees involved with mentoring in FY 2018	Response	/
	68	
Count of SES involved with mentoring in FY 2018	Response	/
	14	
Count of managers involved with mentoring in FY 2018	Response	/
	34	
Count of supervisors involved with mentoring in FY 2018	Response	/
	34	
Total number of employees eligible to participate in FY 2018	Response	/
	1110	

Diversity and Inclusion Training

Diversity and Inclusion Training	Qualitative Questions (Text)	If "No" or "Other", please use this section to provide a detailed explanation.
	Response	Diversity training was provided to all staff after the fiscal year ended,

Formal Diversity and Inclusion Training provided	No	but before the calendar year ended.
Frequency of Diversity and Inclusion Training per year (e.g. annual, semiannual, quarterly, other)	Response Annual	
Training on Unconscious Bias provided	Response No	Unconscious Bias training provided to all staff after the fiscal year ended, but before the calendar year ended.
All employees briefed on agency's Diversity and Inclusion Policies	Response Yes	
Diversity and Inclusion Training Quantitative Questions (# or %)		
Percent of employees who have participated in formal Diversity and Inclusion Training in FY 2018	Response 0.00%	
Percent of Senior Leadership that have participated in formal Diversity and Inclusion Training in FY 2018	Response 0.00%	
Count of employees who have participated in formal Diversity and Inclusion Training in FY 2018	Response 0	
Count of Senior Leadership that have participated in formal Diversity and Inclusion Training in FY 2018	Response 0	
Total number of employees eligible to participate (this should not be equal to the total count that has participated unless 100% of workforce has participated) in FY 2018	Response 1110	
Diversity and Inclusion Council		
Diversity and Inclusion Council	Qualitative Questions (Text)	If "No" or "Other", please use this section to provide a detailed explanation.
Agency has a Diversity and Inclusion Council	Response Yes	
Diversity and Inclusion Council has a charter	Response Yes	
Council members have received training	Response Yes	
Council's mission aligns to agency mission	Response Yes	
Frequency of council meetings (e.g. annual, semiannual, quarterly, other)	Response Quarterly	
Diversity and Inclusion Council Quantitative Questions (# or %)		
Percent of employees on council	Response 1.26%	
Percent of Senior Leadership on council	Response 3.77%	
Count of employees on council	Response 12	
Count of Senior Leadership on council	Response 2	
Total number of people on council	Response 14	
Development Programs		
Development Programs	Qualitative Questions (Yes or No)	If "No" or "Other", please use this section to provide a detailed explanation.

Agency has a SES Candidate Development Program that is announced to all qualified individuals	Response	The agency's NEXT program is provided for staff that are supervisory CU15 and aspire to enter the SSP ranks. The NEXT program is not technically a career development program, as candidates are not moved
	Yes	
The SES Candidate Development Program is evaluated regularly	Response	
	Yes	
Agency has a Career Development Program that is announced to all qualified individuals (this is a CDP that is different from the SES CDP program and geared towards the lower grade levels)	Response	
	Yes	
The Career Development Program is evaluated regularly	Response	
	Yes	
Agency collects demographic data of development program participants (Race, National Origin, Veteran, People with Disabilities, etc.)	Response	
	Yes	
Development Program	Quantitative Questions (# or %)	
Percent of employees who participated in the SES Candidate Development Program in FY 2018	Response	
	2.22%	
Percent of employees who participated in a Career Development Program in FY 2018	Response	
	1.53%	
Count of employees who participated in the SES Candidate Development Program in FY 2018	Response	
	3	
Count of employees who participated in a Career Development Program in FY 2018	Response	
	17	
Performance Plans		
Does your agency have a Diversity and Inclusion (D&I) element in the following groups' performance plans (this may also be incorporated in the leading people element)?		
D&I Element in SES performance plans		Use this section to provide additional response or explanation as it relates to a D&I element in performance plans (required for "No" responses)
Yes or No	Percentage	Count
Yes	100.00%	53
D&I Element in Management/Supervisor performance plans		Use this section to provide additional response or explanation as it relates to a D&I element in performance plans (required for "No" responses)
Yes or No	Percentage	Count
Yes	100.00%	178
D&I Element in employee performance plans		Use this section to provide additional response or explanation as it relates to a D&I element in performance plans (required for "No" responses)
Yes or No	Percentage	Count
No	0.00%	
The agency's Office of Human Resources and Office of Minority and Women Inclusion will discuss this topic during fiscal year 2019.		

ANNUAL FEORP PLAN CERTIFICATION
FOR THE FISCAL YEAR 2019

A. Name and Address of Agency:

National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

B. Name and Title of Designated FEORP Official *(Include e-mail address, telephone and fax numbers. In addition, please include address):*

Monica Davy
Director
Office of Minority and Women Inclusion
1775 Duke Street
Alexandria, VA 22314-3428
Phone: 703 518-1652
E-Mail: mdavy@ncua.gov

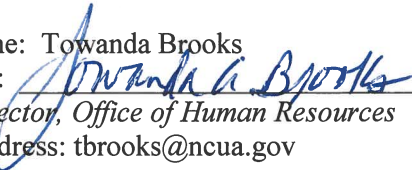
C. Name and Title of Contact Person *(Include e-mail address, telephone and fax number. In addition, please include address):*

Scot Evans
Diversity Outreach Program Analyst
1775 Duke Street
Alexandria, VA 22314-3428
Phone: 703 518-1624
E-Mail: sevans@ncua.gov

CERTIFICATION

I certify the above agency: 1) Has a current Federal Equal Opportunity Recruitment Program (FEORP) plan and the program is being implemented as required by Public Law 95-454 and subsequent regulations and guidance issued by the U.S. Office of Personnel Management; 2) All field offices or installations with fewer than 500 employees are covered by a FEORP plan; 3) All field offices or installations with 500 or more employees are covered either by this plan or by a local plan; and 4) Such plans are available on request from field offices or installations.

Print Name: Towanda Brooks

Signature: 

Date: 12-27-18

Title: Director, Office of Human Resources

Email Address: tbrooks@ncua.gov

Print Name: Monica Davy

Signature: _____ Date: _____

Director, Officer of Minority and Women Inclusion

Email Address: mdavy@ncua.gov

Tab 17

Disabled Veterans Affirmative Action Program (DVAAAP) Accomplishment Report

1. Agency	National Credit Union Administration	2. FY	2018
3. POC Name	Lisa Bazemore	4. Phone	(703) 518-6578

5. Methods used to recruit and employ disabled veterans, especially those who are 30 percent or more disabled (Attach supporting addendums if needed)

During FY18 the National Credit Union Administration (NCUA) applied a variety of strategies to recruit disabled veterans, including targeted recruitment, utilizing an intern program, and providing training to managers on non-competitive appointing authorities. NCUA's recruitment/outreach efforts included the following:

Utilizing the Pathways Recent Graduate Program, which targeted entry level candidates, including disabled veterans, and provided flexibility to veterans who are recent graduates.

Posting all NCUA vacancy announcements on targeted websites to ensure maximum distribution to a diverse audience. This included veterans' organizations and organizations focused on hiring disabled individuals.

Maintaining a NCUA talent bank of Schedule A applicants, which included disabled veterans who applied for positions with the agency. Human Resources Specialists reviewed applications in the talent bank and worked with managers to locate highly qualified candidates for various NCUA positions.

Utilizing the USAJobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a 30% or more disability.

The Office of Minority and Women Inclusion (OMWI) posted a one-page outreach recruitment flyer in the U.S. Veterans Magazine. The U.S. Veterans Magazine has its own engaging website and provides its readers a digital edition. NCUA was ranked a Top Veteran Friendly Company in the U.S. Veterans Magazine's summer edition. (Agency's outreach recruitment flyer is attached)

Utilizing LinkedIn, NCUA improved outreach efforts. This tool allowed 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.

Utilizing the VRA appointing authority, NCUA has been able to internally advance veterans into higher graded positions.

6. OPM DVAAAP Manager Official Use Only: Is there an explanation of the recruitment and employment methods they have used?

Yes ☐	Somewhat ☐	No ☐	
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7. Methods used to provide or improve internal advancement opportunities for disabled veterans
(Attach supporting addendums if needed)

NCUA's Office of Human Resources, Division of Training and Development offered a range of leadership developmental training programs to NCUA employees designed to provide competency based leadership training. The developmental training programs included:

The Aspiring Leader Program, a program offered by the Graduate School's Center for Leadership and Management.

The New Leader Program, a 6-month program designed to develop leadership skills and offered by the Graduate School's Center for Leadership and Management.

The Executive Leadership Program, a 9-month program offered to non-supervisors. Participants complete a variety of activities including a developmental detail and formal training sessions.

The Management Development Program, an NCUA 18-month developmental program for non-supervisors. Candidates gain experience in defining project scopes, delegating work, developing others, etc.

The 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.

The NCUA Executive Training Program, an 18-month program for senior level supervisors. This program was designed to help prepare employees to transition from supervisory/managerial positions into senior leadership positions within the agency.

The Executive Coaching Program, a 12-month program for NCUA's executive staff. This program was designed to help managers become more highly effective leaders, reinforce leadership competencies, enhance performance, etc.

As a result of this effort, 22% of NCUA's participants in developmental programs were disabled veterans.

NCUA's primary occupation is the Credit Union Examiner (CUE). CUE opportunities 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 of their position. During FY18, the agency promoted 17 disabled veterans.

8. OPM DVAAAP Manager Official Use Only: Does agency explain the career advancement methods they have used?

Yes ☐ Somewhat ☐ No ☐

9. A description of how the activities of major operating components and field installations were monitored, reviewed, and evaluated (Attach supporting addendums if needed)

NCUA's Diversity Advisory Council (DAC) works to ensure the agency accomplishes the goals and priorities set forth in the agency's diversity and inclusion strategic plan. The DAC met on a quarterly basis to provide advice and recommendations to senior leadership on areas related to fair inclusion of all groups in the agency's workforce, including veterans and disabled veterans. (Agency's Diversity and Inclusion Strategic Plan is attached)

OHR and OMWI worked to ensure the Agency's measurable targets were met through monitoring and analyzing statistical reports generated through USA Staffing's Applicant Flow Data tool and other Human Resources Information Systems.

As part of the review process, OHR met with offices to discuss agency diversity statistics, goals and recruitment strategies.

10. OPM DVAAAP Manager Official Use Only: Does agency describe how they monitored, reviewed and evaluated their DVAAAP Activities? (If applicable as well as for major operating components and field installations)

Yes ☐ Somewhat ☐ No ☐

**11. An explanation of the agency's progress in implementing its affirmative action plan during the fiscal year. Where progress has not been shown, the report will cite reasons for the lack of progress, along with specific plans for overcoming cited obstacles to progress
(Attach supporting addendums if needed)**

At the end of FY18, NCUA's staff was comprised of 1,110 employees serving in various positions. The total number of disabled veterans was 95, or 8% of the agency's workforce.

During FY 18, NCUA promoted 17 disabled veterans.

Disabled veterans represented 10% of the agency's new hires for FY18.

NCUA continued to pursue additional avenues to recruit and hire disabled veterans, such as expanding outreach efforts and utilizing databases which targets disabled veterans.

Challenges: During FY18, NCUA implemented its reorganization plan, which impacted overall hiring for the agency. The plan included a reduction in Regional Offices and significantly impacted recruitment and outreach efforts for its Credit Union Examiner positions. Credit Union Examiner positions represent NCUA's principal vehicle for recruiting and hiring disabled veterans for the agency.

12. OPM DVAAAP Manager Official Use Only: Does agency explain the progress in implementing DVAAAP? If there was no progress, were there reasons for the lack of progress or challenges and specific plans for overcoming their challenges?

Yes ☐ Somewhat ☐ No ☐

**13. POC's Name, Email, and Phone Number of Operating Components and Field Installations
(If Applicable)**

Agency Disabled Veterans Affirmative Action Program Accomplishment Report Electronic Reporting Instructions

General Instructions:

1. Complete all items and questions in the forms field.
2. Electronic Requirements – Agency should only submit data for what they have accomplished the previous Fiscal Year in accordance with the minimal requirements of the accomplishment report content from Title 5 CFR Part 720 Subpart C, which is provided on this form.
3. Collection of accomplishment data requires a completed accomplishment report data element that has been recorded throughout the previous Fiscal Year. Accomplishment reports may vary from agency to agency. This form provides conformity and standardization for the minimal required core data. The forms have limited characters so agency may attach addendums when needed, if the form does not allow you to capture the data completely.

DVAAP Accomplishment Report Information

1. **Agency** – Provide the name of the agency.
2. **FY** – Provide the Fiscal Year of which the accomplishment report will be covered under.
Examples: 2016.
3. **POC Name** – Provide the name of the point of contact.
4. **Phone** – Provide the phone number of point of contact.
5. **Methods used to recruit and employ disabled veterans, especially those who are 30 percent or more disabled** – Provide methods used to recruit and employ disabled veterans, especially those who are 30 percent or more disabled. You may attach supporting addendums if the information provided pertains to the requirement.
6. **Is there an explanation of the recruitment and employment methods they have used?** – OPM DVAAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency provided an explanation of the recruitment and employment methods they have used.
7. **Methods used to provide or improve internal advancement opportunities for disabled veterans** – Provide methods used to offer or improve internal advancement opportunities for disabled veterans. You may attach supporting addendums if the information provided pertains to the requirement.
8. **Does agency explain the career advancement methods they have used?** - OPM DVAAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency explains the career advancement methods they have used.
9. **A description of how the activities of major operating components and field installations were monitored, reviewed, and evaluated** – Provide a description of how the activities of major operating components and field installations were monitored,

reviewed, and evaluated. You may attach supporting addendums if the information provided pertains to the requirement.

10. Does agency describe how they monitored, reviewed and evaluated their DVAAP Activities? - OPM DVAAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency provided a description of how they monitored, reviewed and evaluated their DVAAP Activities. If applicable, indicate as well for major operating components and field installations.

11. An explanation of the agency's progress in implementing its affirmative action plan during the fiscal year. Where progress has not been shown, the report will cite reasons for the lack of progress, along with specific plans for overcoming cited obstacles to progress - Provide an explanation of the agency's progress in implementing its affirmative action plan during the fiscal year. Where progress has not been shown, the report should cite reasons for the lack of progress, along with specific plans for overcoming cited obstacles to progress. You may attach supporting addendums if the information provided pertains to the requirement.

12. Did agency explain the progress in implementing DVAAP? If there was no progress, were there reasons for the lack of progress or challenges and specific plans for overcoming their challenges? - OPM DVAAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency explained the progress in implementing DVAAP. If there was no progress, were there reasons for the lack of progress or challenges and specific plans to overcoming their challenges?

13. POC's Name, Email, and Phone Number of Operating Components and Field Installations – If applicable provide Point of contact's name, email, and phone number of operating components and field installations.

Disabled Veterans Affirmative Action Program (DVAAAP) Plan and Certification

1. Agency	National Credit Union Administration	2. FY	2019
3. POC Name	Lisa Bazemore	4. Phone	(703) 518-6578

5. A statement of the agency's policy with regard to the employment and advancement of disabled veterans, especially those who are 30 percent or more disabled (Attach supporting addendums if needed)

The National Credit Union Administration (NCUA) wishes to remain one of the best places to work in federal government that hires and maintains a high-performing workforce by leveraging diversity and inclusion and empowering employees to achieve superior results in carrying out the agency's mission.

It is the NCUA's policy to maintain a continuing program of affirmative measures to recruit, hire, train, counsel, and advance qualified disabled veterans, especially those who are rated 30% or more by the Department of Veterans Affairs. The NCUA is also committed to providing reasonable accommodations to all eligible persons with disabilities to allow them an opportunity to perform the essential functions of their position successfully. In order to accomplish this, the agency will make concerted efforts to conduct barrier analysis to identify issues, develop appropriate action plans and utilize strategic hiring initiatives. The Office of Human Resources (OHR) will ensure this plan is implemented through the agency's recruitment efforts and career development and training programs and is distributed to all regional and office directors.

6. OPM/DVAAP Manager Official Use Only: Did agency provide a policy outline in regards to the employment and advancement of disabled veterans, especially those that are 30 percent or more disabled?

Yes ☐ Somewhat ☐ No ☐

7. An assessment of the current status of disabled veteran employment within the agency, with emphasis on those veterans who are 30 percent or more disabled (Attach supporting graphs/charts if needed)

8. Total # Employees	1,110	9. # Of Veterans	190	10. # Of Disabled Veterans	95	11. # Of 30% Or More Disabled Veterans	69
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12. OPM/DVA/AP Manager Official Use Only: Did agency provide an assessment of the current status of disabled veterans, especially those that are 30 percent or more disabled?

Yes ☐ Somewhat ☐ No ☐

13. A description of recruiting methods which will be used to seek out disabled veteran applicants, including special steps to be taken to recruit veterans who are 30 percent or more disabled (Attach supporting addendums if needed)

The NCUA will continue and/or include the following activities to recruit disabled veterans with an added emphasis on veterans with a compensable service-connected disability of thirty (30) percent or more in accordance with 5 C.F.R 720, Subpart C:

Conduct meetings with regional and central office representatives to address outreach efforts.

Increase outreach efforts by participating in various awareness events which target individuals with disabilities and disabled veterans.

Ensure maximum distribution of vacancy announcements by forwarding NCUA postings to various organizations, colleges and universities and other digital on line outreach websites.

OHR will continue to partner with the Office of Minority and Women Inclusion (OMWI) to identify barriers, remove challenges and improve recruitment, employment, and advancement of disabled veterans.

Promote the Workforce Recruitment Program (WRP) to selecting officials as another viable source for filling positions on a time-limited or permanent basis to meet the NCUA's needs.

Continue to partner with hiring officials and encourage participation in all initiatives as it relates to hiring, developing, and retaining the veteran workforce. Provide briefings to managers on hiring flexibilities for all NCUA hiring efforts to maximize usage.

Increase the disabled veteran applicant pool within NCUA's existing Schedule A database by utilizing LinkedIn, open continuous vacancy announcements targeting disabled veterans, and USAJobs Resume Mining feature to search for individuals with disabilities and disabled veterans.

More fully utilize and promote the NCUA's Pathways Program to fill mission critical positions. The NCUA's Pathways Program provides a career development program with career growth and advancement for participants.

14. OPM DVAAAP Manager Official Use Only: Did agency provide a description of recruiting methods that they will use to seek out disabled veterans?

Yes ☐ Somewhat ☐ No ☐

15. OPM DVAAAP Manager Official Use Only: Did agency provide special steps that would be taken to recruit 30 percent or more disabled veterans?

Yes ☐ Somewhat ☐ No ☐

16. A description of how the agency will provide or improve internal advancement opportunities for disabled veterans (Attach supporting addendums if needed)

The NCUA will utilize the following methods to improve internal advancement opportunities for disabled veterans:

Educate and promote awareness to veterans and disabled veterans on available developmental opportunities within the agency.

Encourage managers to advertise non-mission critical positions as trainee/developmental opportunities. This includes utilizing the NCUA's Pathways Program.

Educate and emphasize the importance of recruiting disabled veterans to management staff and hiring officials when advising them of best hiring practices.

Expand messaging to veterans on the educational benefits offered by the NCUA. This information is provided to all newly appointed Credit Union Examiners during the initial training sessions.

Provide webinars and other guidance tools to the NCUA employees in an effort to maximize their competitive potential when applying for career growth or promotion opportunities.

Continue to improve agency developmental training programs in mission critical occupations.

Continue to advertise and recruit career ladder positions with promotion opportunity and provide extensive training to entry level employees through onboarding, webinars, and briefings, in addition to required training, in order to make the transition to NCUA positions successful.

Collaborate with the Veterans Employee Resource Group after its expected establishment in 2019.

Utilize the VRA appointing authority to internally advance disabled veterans.

Continue to offer internal leadership developmental training programs and ensure outreach to agency veterans continues positively and is inclusive.

17. OPM/DVA/AP Manager Official Use Only: Did agency provide a description of how they will provide internal advancement opportunities for disabled veterans?

Yes ☐ Somewhat ☐ No ☐

18. OPM/DVA/AP Manager Official Use Only: If needed, is there a plan of how the agency will improve internal advancement opportunities for disabled veterans?

Yes ☐ Somewhat ☐ No ☐ Not Needed ☐

19. A description of how the agency will inform its operating components and field installations, on a regular basis, of their responsibilities for employing and advancing disabled veterans (Attach supporting addendums if needed)

The NCUA will inform its managers and supervisors of their responsibilities for employing and advancing disabled veterans by performing the following activities:

OHR will provide briefings at supervisory training classes and/or conferences.

During the recruitment consultation process, OHR will educate hiring officials on the procedures of hiring disabled veterans.

Distribute the NCUA's current DV/AAP Plan to all regional and office directors.

Ensure all hiring managers complete training on the Uniformed Services Employment and Reemployment Rights Act (USERRA).

OHR and OMWI will meet with office representatives on a quarterly basis to address diversity and recruitment and outreach efforts.

OMWI in partnership with OHR, will educate managers on the reasonable accommodation process and management's responsibilities to ensure an interactive process occurs.

Host functions and awareness events acknowledging the value of hiring veterans and individuals with disabilities.

20. OPM DV/AAP Manager Official Use Only: Did agency provide a description on how they will inform their operating components and field installations, on responsibilities such as the employment and advancement of disabled veterans? (Not Applicable for agencies that do not have operating components or field installations)

Yes ☐ Somewhat ☐ No ☐ Not Applicable ☐

21. A description of how the agency will monitor, review, and evaluate its planned efforts, including implementation at operating component and field installation levels during the period covered by the plan (Attach supporting addendums if needed)

The NCUA will continue to monitor, review, and evaluate its efforts by performing the following:

Issue NCUA Workforce Profile reports to each office. This report provides an update on the number of veterans and disabled veterans on board and NCUA hiring goals. It also enables the OHR and OMWI to monitor the underrepresented demographics and it will aid and assist the offices with making strategic workforce decisions in hiring and retaining its workforce.

During FY18, the agency increased its focus on workforce planning. This included the development of the agency's Human Capital Plan. The Human Capital Plan, which included analyzing organizational demographics, is intended to meet the changing workforce needs of NCUA. Our strategic focus will continue to help the agency move forward positively with hiring and retaining veterans.

The NCUA's Diversity Advisory Council (DAC) will discuss diversity outreach and strategic plans for increasing representation of disabled veterans. OMWI and OHR will also meet with offices on a quarterly basis to discuss diversity initiatives and human capital strategies.

The NCUA will continue to conduct 100% audit of vacancy announcement case files to ensure that veterans are given proper consideration during the certification/hiring process.

OHR and OMWI will continue to ensure the Agency's measurable targets are met by monitoring and analyzing statistical reports generated through USA Staffing's Applicant Flow Data tool and Human Resources Information Systems.

22. OPM/DVA/AP Manager Official Use Only: Did agency provide a description on how they will monitor, review and evaluate its planned efforts? (If applicable as well as for major operating components and field installations)

Yes ☐ Somewhat ☐ No ☐

**23. POC's Name, Email, and Phone Number of Operating Components and Field Installations
(If Applicable)**

Not Applicable

Plan Certification

The plans shall cover a time period of not less than one year, and may cover a longer period if concurrent with the agency's Section 501(b) Plan. Each plan must specify the period of time it covers.

Agency must have a plan covering all of its operating components and field installations. The plan shall include instructions assigning specific responsibilities on affirmative actions to be taken by the agency's operating components and field installations to promote the employment and advancement of disabled veterans. OPM must be informed when headquarters offices require plans at the field or installation level.

Agency operating components and field installations must have a copy of the plan covering them, and must implement their responsibilities under the plan. OPM may require operating components and field installations to develop separate plans in accordance with program guidance and/or instructions.

Certification

The below certification indicates that the program is being implemented as required by 5 CFR Part 720, Subpart C and appropriate guidance issued by the U.S. Office of Personnel Management. Additionally, this agency has a current plan as required by the regulation.

Please type or print clearly. After an original signature is obtained, scan and return this sheet.

24. Dates of the Period of Time the Plan is Covered		From	10/01/2018	To	09/30/2019
25. Agency Name	National Credit Union Administration				
26. DVAAAP POC's Name	Lisa Bazemore				
27. Title	Lead HR Specialist				
28. Telephone Number	(703) 518-6578	29. Email	mbazemore@ncua.gov		
30. Date Plan Last Amended		31. Date Effective	10/01/2018		
32. DVAAAP Certifying Official's Name	Towanda Brooks				
33. Title	Director, Office of Human Resources				
34. Telephone Number	(703) 518-6511	35. Email	tbrooks@ncua.gov		
36. DVAAAP Certifying Official Signature	TOWANDA BROOKS		Digitally signed by TOWANDA BROOKS Date: 2018.11.30 11:50:03 -0500		
37. Date					

Agency Disabled Veterans Affirmative Action Program Plan and Certification

Electronic Reporting Instructions

General Instructions:

1. Complete all items and questions in the forms field.
2. Electronic Requirements – Agency should only submit data for what they are planning to do for the next Fiscal Year in accordance with the minimal requirements of the plan content from Title 5 CFR Part 720 Subpart C, which is provided on this form.
3. Collection of plan data requires a completed plan data element that has been recorded to be used throughout the Fiscal Year. Plans may vary from agency to agency. This form provides conformity and standardization for the minimal required core data. The forms have limited characters so agency may attach addendums when needed, if the form does not allow you to capture the data completely.

DVAAP Plan and Certification Information

1. **Agency** – Provide the name of the agency.
2. **FY** – Provide the Fiscal Year of which the plan will be covered under. If the plan is covering more than one year capture it in the form field, as seen on the following example: 2016-2018.
3. **POC Name** – Provide the name of the point of contact.
4. **Phone** – Provide the phone number of point of contact.
5. **A statement of the agency's policy with regard to the employment and advancement of disabled veterans, especially those who are 30 percent or more disabled** – Provide a statement of the agency's policy in regards to the employment and advancement of disabled veterans, especially those who are 30 percent or more disabled. You may attach supporting addendums if the information provided pertains to the requirement.
6. **Did agency provide a policy outline in regards to the employment and advancement of disabled veterans, especially those that are 30 percent or more disabled?** – OPM DVAAP Manager should click on "Yes", "Somewhat" or "No" to indicate if the agency provided a policy in regards to the employment and advancement of disabled veterans, especially those that are 30 percent or more disabled.
7. **An assessment of the current status of disabled veteran employment within the agency, with emphasis on those veterans who are 30 percent or more disabled** - Provide an assessment of the current status within the agency of the total amount of employees, veterans, disabled veterans and emphasizing those veterans who are 30 percent or more disabled. You may attach supporting graphs, charts, and addendums if the information provided pertains to the requirement.
8. **# of Employees** – Provide the total number of employees within the agency.
9. **# of Veterans** – Provide the total number of veterans within the agency.
10. **# of Disabled Veterans** - Provide the total number of disabled veterans within the agency.

11. **# of 30% or More Disabled Veterans** – Provide the total number of 30% or more disabled veterans within the agency.
12. **Did agency provide an assessment of the current status of disabled veterans, especially those that are 30 percent or more disabled?** – OPM DV/AAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency provided an assessment of the current status of disabled veterans, especially those that are 30 percent or more disabled.
13. **A description of recruiting methods which will be used to seek out disabled veteran applicants, including special steps to be taken to recruit veterans who are 30 percent or more disabled** – Provide a description of recruiting methods which will be used to seek out disabled veteran applicants, including special steps to be taken to recruit veterans who are 30 percent or more disabled. You may attach supporting addendums if the information provided pertains to the requirement.
14. **Did your agency provide a description of recruiting methods that they will use to seek out disabled veterans?** - OPM DV/AAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency provided a description of recruiting methods that they will use to seek out disabled veterans.
15. **Did your agency provide special steps that would be taken to recruit 30 percent or more disabled veterans?** - OPM DV/AAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency provided special steps that would be taken to recruit 30 percent or more disabled veterans.
16. **A description of how the agency will provide or improve internal advancement opportunities for disabled veterans** – Provide a description of how the agency will provide or improve internal advancement opportunities for disabled veterans. You may attach supporting addendums if the information provided pertains to the requirement.
17. **Did your agency provide a description of how they will provide internal advancement opportunities for disabled veterans?** - OPM DV/AAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency provided a description of how they will provide internal advancement opportunities for disabled veterans.
18. **If needed, is there a plan of how your agency will improve internal advancement opportunities for disabled veterans?** - OPM DV/AAP Manager should click on “Yes”, “Somewhat”, “No”, or “Not Needed” to indicate if agency provided a description of how they will improve internal advancement opportunities for disabled veterans.
19. **A description of how the agency will inform its operating components and field installations, on a regular basis, of their responsibilities for employing and advancing disabled veterans** – Provide a description of how the agency will inform its operating components and field installations, on a regular basis, of their responsibilities for employing and advancing disabled veterans. You may attach supporting addendums if the information provided pertains to the requirement. For agencies that do not have operating components or field installations, state in the form field N/A.

20. Did your agency provide a description on how they will inform their operating components and field installations, on responsibilities such as the employment and advancement of disabled veterans? - OPM DV/AAP Manager should click on “Yes”, “Somewhat”, “No”, or “Not Applicable” to indicate if agency provided a description on how they will inform their operating components and field installations on a regular basis, on responsibilities such as the employment and advancement of disabled veterans. Not Applicable for agencies that do not have operating components or field installations.
21. A description of how the agency will monitor, review, and evaluate its planned efforts, including implementation at operating component and field installation levels during the period covered by the plan – Provide a description of how the agency will monitor, review, and evaluate its planned efforts, if applicable, including implementation at operating component and field installation levels during the period covered by the plan. You may attach supporting addendums if the information provided pertains to the requirement.
22. Did your agency provide a description on how they will monitor, review and evaluate its planned efforts? OPM DV/AAP Manager should click on “Yes”, “Somewhat” or “No” to indicate if the agency provides a description on how they will monitor, review and evaluate its planned efforts.
23. POC’s Name, Email, and Phone Number of Operating Components and Field Installations – If applicable provide point of contact’s name, email, and phone number of operating components and field installations.
24. Dates of the Period of Time the Plan is Covered – Provide the start date of the plan and the end date of the plan.
25. Agency Name – Provide the name of the agency.
26. DV/AAP POC’s Name – Provide the DV/AAP point of contact’s name.
27. Title – Provide the title of the point of contact.
28. Telephone Number – Provide the phone number of the point of contact.
29. Email – Provide the email of the point of contact.
30. Date Plan Last Amended – Provide the date of when the plan was last amended.
31. Date Effective – Provide the date when the plan is effective.
32. DV/AAP Certifying Official’s Name – Provide the DV/AAP Certifying Official’s name.
33. Title – Provide the title of the DV/AAP Certifying Official.
34. Telephone Number – Provide the phone number of the DV/AAP Certifying Official.
35. Email – Provide the email of the DV/AAP Certifying Official.
36. DV/AAP Certifying Official Signature – DV/AAP Certifying Official must provide an electronic signature or print out the page and hand sign the plan certification.
37. Date – Provide the date that plan was signed.

Tab 18

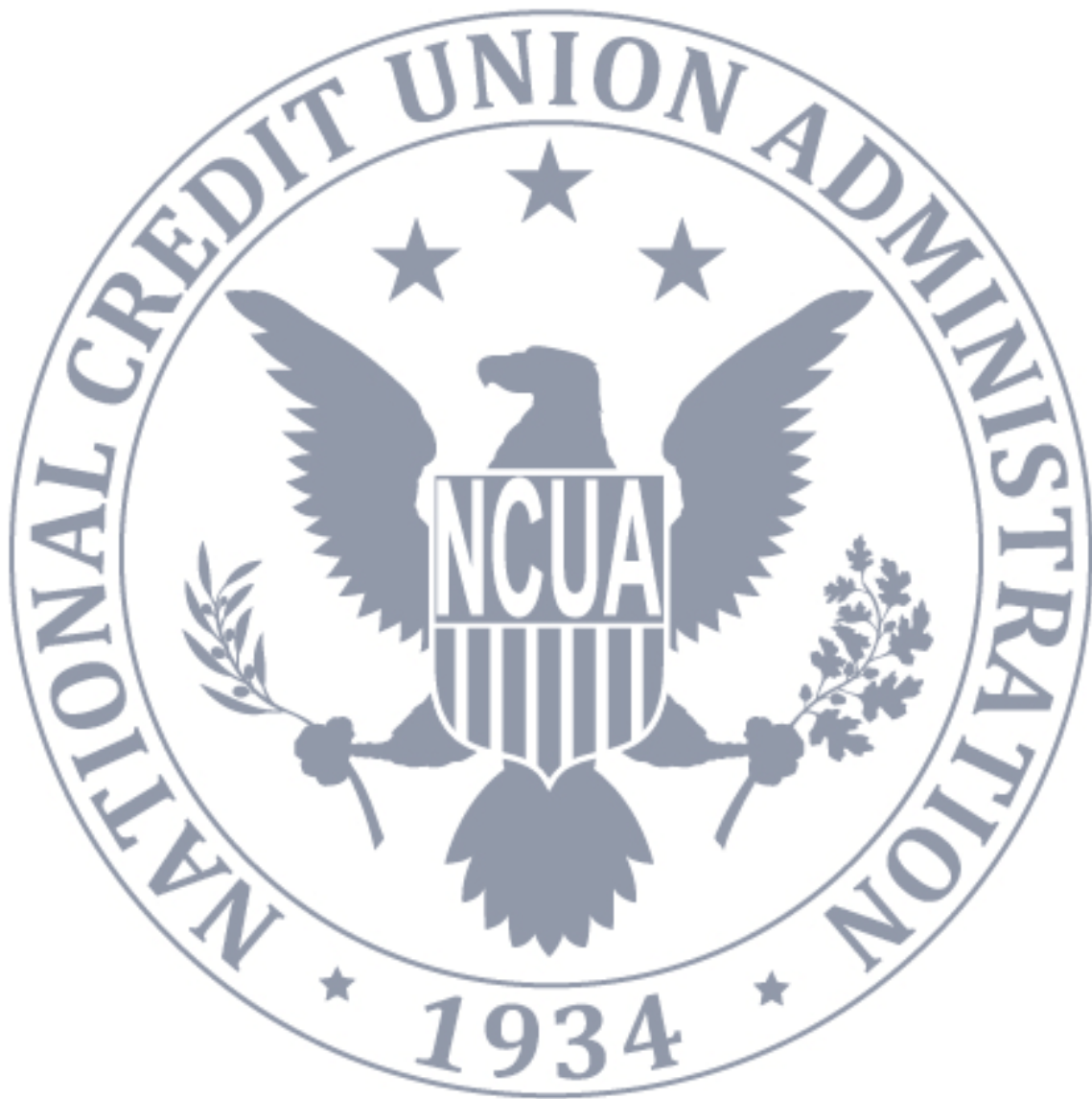


NCUA
National Credit Union Administration

Human Capital Plan 2018-2019

July 2018

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Human Capital Plan • (2018-2019)

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Message from the Executive Director

The National Credit Union Administration has developed its first Human Capital Plan with the goal of optimizing the agency's most important resource, our staff. The purpose of a human capital plan is to help agencies ensure efficient and effective long-term strategic workforce management, supported by agency-specific data. This Human Capital Plan provides goals and strategies to strengthen our workforce, grow our agency's leaders, and ensure our ability to attract, develop, manage, and retain the best workforce to meet our agency's needs.

With guidance from the Talent Management Council, the Office of Human Resources led the development of the NCUA's 2018/2019 Human Capital Plan, which provides a good reflection of the efforts throughout the agency to execute the priorities of the Board. The Human Capital Plan focuses on priority areas and aligns with the 2018-2022 Strategic Plan and the 2018 Annual Performance Plan.

This plan is available on NCUA Central; and, if you are interested in learning more, please contact OHRmail@NCUA.gov or one of the lead offices listed in this plan.

Mark A. Treichel
Executive Director



Executive Summary

National Credit Union Administration

The National Credit Union Administration (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 NCUA is responsible for the regulation and supervision of over 5,000 federally insured credit unions with more than 110 million members and more than \$1.3 trillion in assets across all states and the U.S. territories.

The employees of the NCUA are critical to achieving our mission of providing, through regulation and supervision, a safe and sound credit union system, which promotes confidence in the national system of cooperative credit.

NCUA employees work together to ensure the agency meets the vision of protecting credit unions and the consumers who own them through effective supervision, regulation and insurance, and through the following values:

- Integrity – Adhere to the highest ethical and professional standards.
- Accountability – Accept responsibilities and meet commitments.
- Transparency – Be open, direct and frequent in communication.
- Inclusion – Foster a workplace culture that values diverse backgrounds, experiences and perspectives.
- Proficiency - Deploy a workforce with a high degree of skill, competence and expertise to maximize performance.

The framework for this Human Capital Plan includes the integration of:

- [NCUA's Strategic Plan for 2018-2022](#);
- [The 2018 Annual Performance Plan](#);



- [NCUA's Reorganization & Modernization Plan \(July 2017\)](#);
- [The 2017 Federal Employee Viewpoint Survey Results](#); and
- A profile of the NCUA workforce.

Purpose

The purpose of this Human Capital Plan is to support the business goals and objectives of NCUA and to create a unifying document that communicates planning and decisions related to strategies impacting our workforce. This plan is intended to meet the changing workforce needs of NCUA and to guide leadership to focus energy, efforts, and resources on the most important and relevant human capital objectives in 2018 and 2019 by:

- Beginning the work to identify, translate, and align workforce requirements and resources to NCUA's Strategic plan and Annual Performance Plan;
- Establishing mission critical occupation focus areas for study, evaluation, and strategy development;
- Defining focus categories in which time, attention and resources should be given to increase success in meeting strategic human capital objectives; and
- Establishing key strategies and expected results based upon focus categories.

Scope

This plan applies to the human capital management of the entire NCUA workforce. This includes but is not limited to recruitment, assessment, selection, development, engagement, and sustainment of a vibrant and effective workforce to achieve NCUA's mission. This plan should be referenced and inform decisions, priorities, workforce adjustments, and resources related to human capital management.



Organizational Structure

The NCUA is administered by a three-member board appointed by the President and confirmed by the Senate. The President designates the Chairman. No more than two Board members can be from the same political party, and each member serves a staggered six-year term.

The NCUA employs over 1100 employees with two-thirds of the workforce serving as examination field staff working in a mobile or remote environment responsible for a portfolio of credit unions covering all 50 states, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands. Because nearly two-thirds of the workforce does not report to a physical office on a daily basis, the NCUA is a decentralized organization.

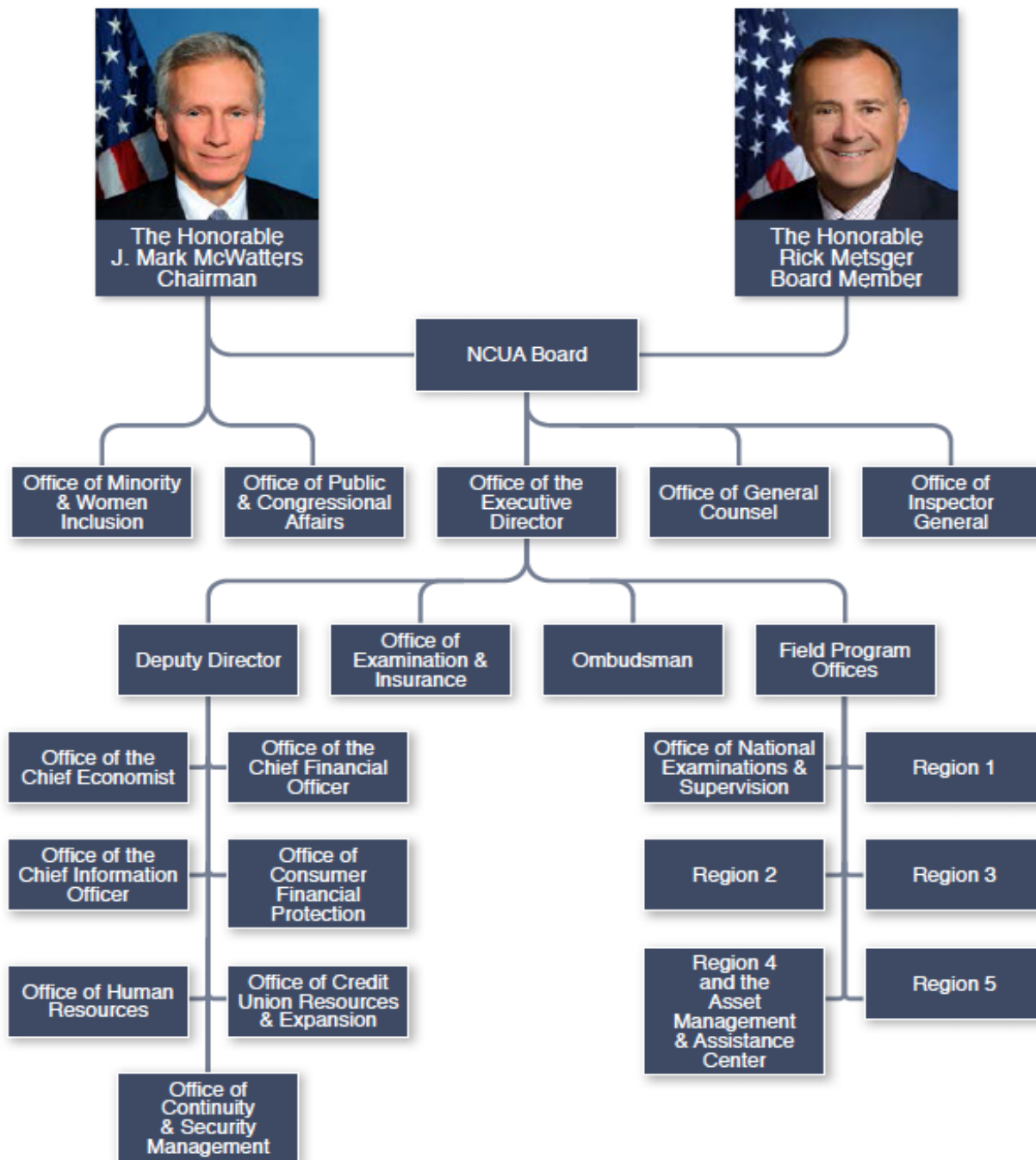
NCUA's Headquarters Office (HQ) is located in Alexandria, VA, and starting in January 2019 will have three Regional Offices located in Alexandria, VA; Austin, TX; and Tempe, AZ.

The following charts show the current organizational structure, the geographic distribution of the workforce, and a brief workforce profile as of May 2018.



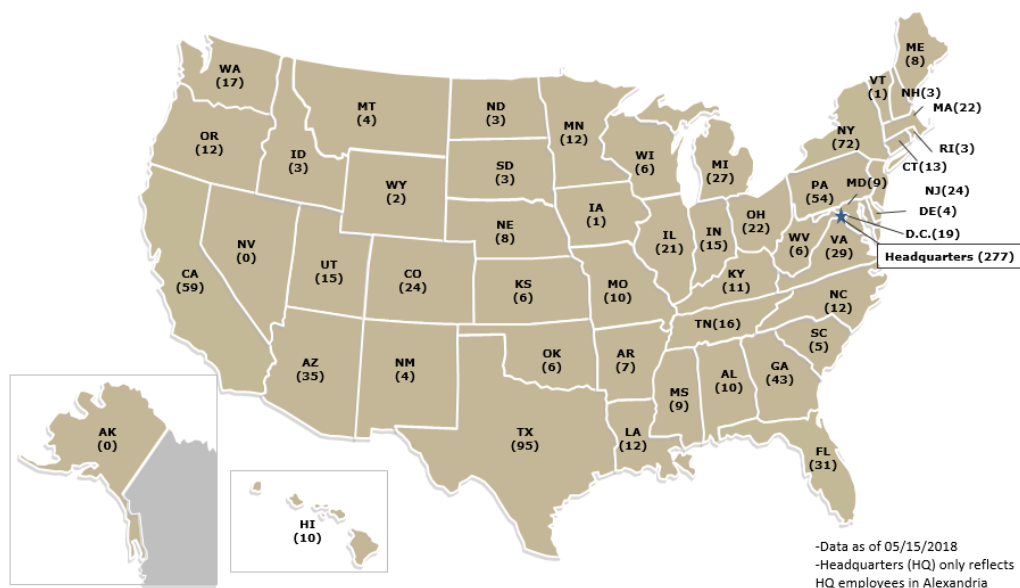


Organizational Chart





Geographic Distribution of the NCUA Workforce



NCUA Workforce Profile (as of May 2018)

Office	Number of Employees Onboard		HQ/Field Total & %	Average Grade*	% Eligible to Retire in 5 Years
	Non-Supv	Supv/ Mgr			
NCUA Board (Board)	4	4	343 / 31%	11.3	67%
Office of Consumer Financial Protection (OCFP)	21	4		12.6	36%
Office of Continuity and Security Mgmt (OCSM)	10	2		13.1	25%
Office of CU Resources & Expansion (CURE)	32	5		12.7	57%
Office of Examination and Insurance (E&I)	37	8		13.8	42%
Office of Human Resources (OHR)	37	7		12.6	27%
Office of Minority and Women Inclusion (OMWI)	8	2		13.0	30%
Office of Public & Congressional Affairs (PACA)	6	2		13.5	43%
Office of the Chief Economist (OCE)	5	1		14.6	50%
Office of the Chief Financial Officer (OCFO)	38	10		12.6	21%
Office of the Chief Information Officer (OCIO)	35	7		13.4	24%
Office of the Executive Director (OED)	5	5		13.3	50%
Office of the General Counsel (OGC)	32	6		13.8	45%
Office of the Inspector General (OIG)	7	3		13.1	50%
Office of National Examinations (ONES)	31	6	777 / 69%	13.9	43%
Region I Albany	121	18		12.1	31%
Region II Capital	128	20		12.2	32%
Region III Atlanta	122	19		12.2	26%
Region IV Austin	126	21		12.1	29%
Region IV - AMAC	16	4		12.6	60%
Region V Tempe	125	20		12.3	32%
Total NCUA	946	174		12.5	33%
NOTE: Current NCUA organization prior to regional reorganization		1120	* Executive Staff Excluded		



Mission Critical Occupations (MCOs)

MCOs are occupations that set direction, directly impact, or execute performance of mission critical functions or services. The below chart identifies 5 MCOs and functional areas that meet the definition of an MCO for NCUA and are most at risk for staffing or skill gaps based on recruitment, development, retention and environmental factors. Omission of an occupation does not mean that it is not deemed as mission critical to NCUA. Senior leaders are committed to studying these MCOs and will work to identify strategies to address risk areas.

Government-wide high-risk focus MCOs identified by the Office of Personnel Management in partnership with the Chief Human Capital Officer's (CHCO) Council have been included in the MCO strategic focus of this human capital plan.

2018 and 2019 NCUA MCO Strategic Focus:

MCO/Functional Community	Job Series	Percentage of NCUA workforce	Competencies in Occupation if applicable
Credit Union Examination	0580	69%	Competency Focus: • Cybersecurity • Commercial Lending • Fraud • Payment Systems • BSA • Residential Real Estate and Auto Lending • Servicing
Financial Management, Accounting & Auditing*	0501 0510 0511	5%	Competency Focus: • Financial Analysis • Data management and analytics • Presenting complex technical information



Information Technology*	2210	4%	Competency Focus: • Agile Development • IT Capacity Planning • Info Systems/Network Security
Human Resources*	0201	3%	Competency Focus: • HR Data Analytics • Strategic Consulting
Acquisition Management*	1102	1%	Competency Focus: • Financial Analysis • Data Management and Analytics • Presenting Complex Technical Presentation

*Denotes occupation identified by OPM and the CHCO Council as a most at-risk MCO government-wide.





Human Capital Strategies

NCUA leadership in partnership with the NCUA Talent Management Council (TMC) has identified four areas of focus to guide the NCUA in achieving its Strategic Goal 3: *Maximize organizational performance to enable mission success*. By focusing on these areas, we hope to improve organizational effectiveness and enhance employee engagement. Workforce engagement is listed first and is critical to the performance of our organization because an engaged workforce takes more accountability in the success and results produced by the agency. An engaged workforce has increased energy, innovation, and drive for personal growth and is more flexible during times of change. For these reasons, NCUA is committed to improving employee engagement throughout our organization.

The categories for our focus areas are:

- Workforce Alignment and Engagement
- Training and Development
- Leadership Skills Building
- Technology Advancements

In addition to addressing identified areas for focus, the strategies outlined in these categories will assist NCUA in achieving the following Strategic Goal 3 performance indicators and targets.

GOAL	INDICATOR	TARGET
3.1.1	Obtain at least an 88% average satisfaction rating in training class evaluations.	88%
3.1.2	Improve NCUA's score for the Partnership for Public Service's Support for Diversity Indicator (Employee Viewpoint Survey Questions 34, 45, and 55) by one percentage point. These questions measure the extent to which employees believe that actions and policies of leadership and management promote and respect diversity.	66.7%
3.1.2	Improve NCUA's score for OPM's Inclusion Quotient by one percentage point. The Inclusion Quotient identified behaviors that help create an inclusive environment.	66%
3.1.3	Improve NCUA's Federal Employee Viewpoint Survey Employee Engagement Index 3.1.3 by two percentage points.	Greater than or Equal to 71%
3.1.3	Conduct post-program reviews of management and executive development programs in coordination with oversight committees and participant supervisors at the conclusion of each program.	Fourth Quarter 2018
3.2.1	Develop a workforce and succession plan that will address the changing needs of the agency.	Second Quarter 2018
3.2.2	Obtain a score of 70% or above on the NCUA's Federal Employee Viewpoint Survey Question 36, "My organization has prepared employees for potential security threats."	Greater than or Equal to 70%



Workforce Alignment and Engagement

STRATEGY	LEAD	DATE COMPLETE	RESULTS
Create a Workforce Plan	OHR	June 2018	• NCUA-wide Human Capital Plan for 2018-2019. • Workforce plans for all NCUA, beginning with ONES, OCFO, OMWI, and BID.
The Office of Human Resources (OHR) will work with senior leaders to develop a workforce and succession plan that will address the changing needs of the agency. This plan outlines the strategic human capital priorities for 2018 and 2019. OHR will also work with offices to develop workforce plans to meet the specific needs of their immediate staff.			
Improve the FEVS Employee Engagement Index (EEI)	OED	October 2019	• Senior leaders will share the annual performance indicator for goal 3.1.3 with all employees. • Senior leaders will develop action plans based on 2018 EEI score for their offices within 90 days of receiving results. • Senior leaders will incorporate regular communications with staff into their action plans. • Supervisors will demonstrate, through communication during performance reviews, how the work is tied to agency goals and priorities. • NCUA performance indicator for goal 3.1.3 on improving the EEI by 2% is reached for 2018.
The President's Management Agenda, <i>Workforce for the 21st Century</i> , provides strategies to improve employee performance management and engagement through several key milestones. One of the milestones is to identify the bottom 20% of scores on the 2017 EEI (the lowest four scores are highlighted in the appendix). With NCUA focusing on the four scores, as well as other activities identified in each Office's action plan, the EEI should reach 83% by 2020. Further, this strategy impacts the EEI score for the agency and should enable us to achieve the 2% goal in the 2018 Annual Performance Plan. OHR will work with offices to provide tools and resources for improving employee engagement throughout the NCUA, including the previous efforts to improve engagement.			



STRATEGY	LEAD	DATE COMPLETE	RESULTS
Create Organizational Manual	OHR	December 2018	Clarification of roles, responsibilities, and functions of offices and alignment to mission.
OHR will work with senior leaders to develop an Organizational Manual. The Organizational Manual will define the missions and functions of each office within the NCUA. The Manual will explain the purpose of each office and its respective programs, thus clarifying how each office supports the NCUA's overall mission.			
Office Closures Region 1&3 Closure	OED/RDs	January 2019	Consolidation from five to three regions by closing the Albany, NY and Atlanta, GA regional offices.
The 2017 Modernization and Efficiency Plan identified several areas of to streamline processes and reduce costs. Closure of two regional offices is part of these cost saving measures.			
Establish CURE and Support Workforce Transition	CURE	December 2018	A high-performing workforce to meet the priorities and challenges of the newly established office.
The Office of Credit Union Resources and Expansion (CURE) was established January 2018 as a result of the 2017 Modernization and Efficiency Plan. The creation of CURE redefined and realigned the following programs: chartering and Field of Membership (FOM); credit union development, grants and loans; and minority depository institution preservation. This change resulted in significant staff transitions to new roles that required customized training and development. OHR will continue to work with CURE to assist with meeting with workforce needs and moving toward the target state of the office.			
Office Reorganizations E&I, OCFO, & OCIO	E&I/ OCFO/OCIO	December 2018	Increased efficiency in business processes and organizational and reporting structures.
- The Office of Examination and Insurance's (E&I) model changed to have fewer SSP positions and more first-line supervisors with smaller work units who share the specialized knowledge of their direct reports. - Office of the Chief Financial Officer (OCFO) restructured to better align with consolidation of NCUA accounting and financial reporting functions into the office. - Update the reporting structure within the Office of the Chief Information Officer (OCIO) to increase efficiency and mission enablement.			



STRATEGY	LEAD	DATE COMPLETE	RESULTS
Staffing Adjustment ONES	ONES	June 2019	A staffing model that reflects increased staffing numbers needed to support the new continuous data-driven supervision model.
The size and complexity of the credit unions assigned to Office of National Examinations and Supervision (ONES) demands new examination techniques to assess and monitor risk, so a continuous data-driven supervision model is being developed and staffed. Consumer credit unions over \$10 billion in assets are expected to grow from 6 to 16 in five years, while assets grow from \$190 billion to \$400 billion. New FTEs are authorized to augment the ONES and OCIO internal staff dedicated to the development and full implementation of a continuous supervision program.			
Staffing Adjustment BID	BID	December 2018	Expand the capacity of the BID Office to address agency priorities
Business Innovation Office (BID) supports investment in IT, and advancing our data analytics creates opportunities for reducing our footprint in credit unions and allowing field staff more flexibility with completing exams offsite. BID will be converting the current three temporary BID FTEs to permanent positions and authorizing contractor support to develop a five-year data analytics roadmap. Two temporary positions will be added to BID at the CU-13/14 levels to assist with the next generation examination and data analytics program.			





Training and Development

STRATEGY	LEAD	DATE COMPLETE	RESULTS
Develop an Annual NCUA Strategic Planning Process for Training and Development	OHR & TMC	December 2018	A process that will ensure all employees gain the knowledge and skills most critical to their roles in executing NCUA's mission.
The process will provide a strategic, yet flexible approach to executing a comprehensive training and development program, including technical and non-technical curriculum. It will include processes for assessing and prioritizing training needs and planning for needed resources to develop and deliver instructor led training and e-learning.			
Consumer Access Analyst Training	OHR/CURE	April 2018	Establish a comprehensive training program for new Consumer Access Analysts to help transition them into their new roles.
OHR worked with instructional design specialists to develop classroom and on-the-job training for employees being reassigned to the role of Consumer Access Analysts in CURE as a result of the NCUA's reorganization and realignment effort.			
Creating Communities of Practice for Specialty Areas	E&I	December 2019	Continuous learning for specialty examiner workforce to enhance and leverage knowledge sharing.
E&I desires to provide an opportunity for continuous learning for specialty areas. Because specialists and analysts are highly specialized and experienced, this part of the workforce would benefit from a structured venue for networking. Communities of practice will allow these groups to collaborate, coach, and share information among participants.			



Leadership Skills Building

STRATEGY	LEAD	DATE COMPLETE	RESULTS
Build Capacity for Succession Planning	OHR & TMC	June 2019	• Develop competency models for career SSP positions. • Pilot succession planning tools to assess leadership potential in current workforce. • Identify opportunities for external sourcing for talent.
OHR will work to develop competency models for career SSP positions in the agency. These competency models will lay the foundation for robust succession planning efforts and will facilitate alignment of recruitment, performance management, leadership development, and continued learning for our executive corps and other leadership positions.			
Maximizing Employee Performance	OHR	December 2018	• Supervisors that are competent and confident in taking appropriate action to address poor performance and misconduct, which supports a performance-driven culture.
OHR will work with managers to implement improvement actions from the report to OMB. Many actions are involved in this effort, including review and update of current policy and training for managers.			
Change Management	OHR	January 2019	• Training and/or individual coaching services, tools, and resources for NCUA executives, supervisors, and employees to improve their personal aptitude for change and so they can be successful change management leaders for the agency throughout the reorganization.
DTD is partnering with external consultant to implement a multi-faceted change management strategy to assist with the agency reorganization.			



New Development Options for Leaders	OHR	December 2018	• Ideal leadership in action to ensure full employee engagement and mission execution.
OHR has created several new internal training options for NCUA supervisors including Franklin Covey modules with on-demand and instructor-led options, coaching, and customized leadership curriculum to encourage ideal leadership through applied behaviors.			

Technology Advancements

STRATEGY	LEAD	DATE COMPLETE	RESULTS
HR Links Implementation	OHR/ OCFO/ OCIO	June 2018	• Efficient processing of personnel actions to ensure accurate recordkeeping for employee records. • User-friendly time and attendance administration for accurate pay and leave accounting.
OHR and OCFO have partnered for the successful migration to a new comprehensive human resources system for personnel processing and time and attendance.			
New Learning Management System	OHR & OCIO	December 2019	• Employees have accessible, online training options at their fingertips. • Improved training recordkeeping will allow employees to track training completions for both internal and external training.
OHR and OCIO will partner to develop requirements, prepare solicitation, initiate the competitive procurement process, and migrate users onto a new Learning Management System to replace Learn Center.			



USASTaffing Upgrade Implementation	OHR	September 2018	• Improved communication with hiring managers during the recruitment process. • Enhanced flexibility for weighting of questions and competencies on job assessments allowing for better quality of candidates. • Increased access to integrated assessments.
OHR is working with OPM to implement an upgrade to the existing USASTaffing system. The new system allows for greater efficiencies and partnering with hiring managers for their recruitments.			





References and Contact Information

Office of Human Resources

For more information or to get involved, please send inquiries to the OHR Mailbox at OHRMail@ncua.gov or contact Tami B. Smith, Deputy Director of OHR at tbsmith@ncua.gov.

References

[Strategic Plan](#)

[2018 Annual Performance Plan](#)





National Credit Union Administration

Federal Employee Viewpoint Survey

Historical Employee Engagement Index Results

Goal: Improve the 4 lowest 2017 scores (highlighted) by 20% by the 2020 FEVS

	NCUA 2017	NCUA 2016	NCUA 2015	NCUA 2014
Employee Engagement Index - Percent Positive	69%	73%	72%	72%
Leaders Lead	58%	64%	64%	63%
Supervisors	77%	79%	79%	79%
Intrinsic Work Experience	72%	75%	73%	74%
	NCUA 2017	NCUA 2016	NCUA 2015	NCUA 2014
Leaders Lead - Percent Positive	58%	64%	64%	63%
53. In my organization, senior leaders generate high levels of motivation and commitment in the workforce.	45%	54%	51%	50%
54. My organization's senior leaders maintain high standards of honesty and integrity.	57%	62%	61%	62%
56. Managers communicate the goals and priorities of the organization.	67%	72%	72%	71%
60. Overall, how good a job do you feel is being done by the manager directly above your immediate supervisor?	67%	69%	72%	71%
61. I have a high level of respect for my organization's senior leaders.	55%	63%	62%	61%
	NCUA 2017	NCUA 2016	NCUA 2015	NCUA 2014
Supervisors - Percent Positive	77%	79%	79%	79%
47. Supervisors in my work unit support employee development.	73%	76%	77%	76%
48. My supervisor listens to what I have to say.	81%	80%	81%	82%
49. My supervisor treats me with respect.	84%	86%	86%	85%
51. I have trust and confidence in my supervisor.	73%	73%	75%	74%
52. Overall, how good a job do you feel is being done by your immediate supervisor?	74%	77%	77%	76%
	NCUA 2017	NCUA 2016	NCUA 2015	NCUA 2014
Intrinsic Work Experience - Percent Positive	72%	75%	73%	74%
3. I feel encouraged to come up with new and better ways of doing things.	56%	62%	57%	60%
4. My work gives me a feeling of personal accomplishment.	77%	79%	77%	78%
6. I know what is expected of me on the job.	79%	80%	81%	78%
11. My talents are used well in the workplace.	65%	68%	66%	68%
12. I know how my work relates to the agency's goals and priorities.	82%	87%	86%	87%