

**National Credit Union Administration**

**For period covering October 1, 2023 to September 30, 2024**

**PART A**  
Department  
or Agency  
Identifying  
Information

**1. Agency**

**1.** National Credit Union Administration

**1.a** 2nd level reporting component

N/A

**2. Address**

**2.** 1775 Duke Street

**3. City, State, Zip Code**

**3.** Alexandria, VA 22314

**4. Agency Code**

**5. FIPS code(s)**

**4.** CU00

**5.** 0000

**PART B**  
Total  
Employment

**1.** Enter total number of permanent full-time and part-time employees

**1.** 1200

**2.** Enter total number of temporary employees

**2.** 37

**3. TOTAL EMPLOYMENT [add lines B 1 through 2]**

**4.** 1237

**PART C**

Agency Official(s) Responsible  
For Oversight of EEO  
Program(s)

**Title Type**

**Name**

**Title**

Head of Agency

The Honorable Kyle Hauptman

NCUA Chairman

Head of Agency Designee

Towanda Brooks

NCUA Acting Deputy Executive  
Director

Principal EEO Director/Official

Miguel A. Polanco

OMWI Director

Affirmative Employment Program Manager

Miguel A. Polanco

OMWI Director

Complaint Processing Program Manager

Stephanie Smith

Equal Employment Opportunity  
Specialist

Diversity & Inclusion Officer

Scot Evans

Outreach Program Manager

Hispanic Program Manager (SEPM)

Gladymar Rivera-Virella

Equal Employment Opportunity  
Specialist

Women's Program Manager (SEPM)

Gladymar Rivera-Virella

Equal Employment Opportunity  
Specialist

Disability Program Manager (SEPM)

Holly Aguilar

Diversity and Inclusion Specialist

Special Placement Program Coordinator (Individuals  
with Disabilities)

Lisa Bazemore

Lead Human Resources Specialist

Reasonable Accommodation Program Manager

Tiffany Thompkins

Human Resources Specialist

Anti-Harassment Program Manager

Katherine Easmunt

Chief Ethics Counsel, Anti-  
Harassment Program Director

Anti-Harassment Program Manager

Don Names

Associate Counsel, Anti-Harassment  
Coordinator

ADR Program Manager

Stephanie Smith

Equal Employment Opportunity  
Specialist

Compliance Manager

Miguel A. Polanco

OMWI Director

Principal MD-715 Preparer

James Walter

Data Analyst

Principal MD-715 Preparer

Gladymar Rivera-Virella

Equal Employment Opportunity  
Specialist

Other EEO Staff

Terri Finley-Harrigan

Administrative Assistant

For period covering October 1, 2023 to September 30, 2024

<b>PART D</b> List of Subordinate Components Covered in This Report	<b>Subordinate Component and Location</b> (City/State)	<b>Country</b>	<b>Agency Code</b>
<b>EEOC FORMS and Documents</b>	<b>Required</b>	<b>Uploaded</b>	
Alternative Dispute Resolution Procedures	Y	Y	
Agency Strategic Plan	Y	Y	
Anti-Harassment Policy and Procedures	Y	Y	
Personal Assistance Services Procedures	Y	Y	
Organization Chart	Y	Y	
EEO Policy Statement	Y	Y	
Reasonable Accommodation Procedure	Y	Y	
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N	
EEO Strategic Plan	N	N	
Human Capital Strategic Plan	N	N	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	N	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	N	
Diversity Policy Statement	N	N	

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EXECUTIVE SUMMARY: MISSION

**National Credit Union Administration**

Created by the U.S. Congress in 1970, the NCUA is an independent federal agency that insures deposits at federally insured credit unions, protects the members who own credit unions, charters and regulates federal credit unions, and promotes widespread financial education and consumer financial protection. The agency protects the safety and soundness of the credit union system by identifying, monitoring, and reducing risks to the National Credit Union Share Insurance Fund.

**NCUA Mission:** Protecting the system of cooperative credit and its member-owners through effective chartering, supervision, regulation, and insurance.

**NCUA Vision:** Strengthen communities and protect consumers by ensuring equitable financial inclusion through a robust, safe, sound, and evolving credit union system.

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## EXECUTIVE SUMMARY: ACCOMPLISHMENTS

**Successes Achieved****Recruitment and Outreach**

**The NCUA continues exploring new methods to reach prospective applicants identified during recruitment and outreach events, building a list of potential employment candidates, and providing useful resources. The NCUA conducted recruitment and outreach efforts in FY24, as required by Section 342 of the Dodd-Frank Act. The NCUA's sustained focus on recruitment resulted in an increase in participation in recruitment events and new outreach partnerships.**

The NCUA's Recruitment Outreach Working Group helps streamline the agency's recruitment outreach efforts to increase the number of talented candidates in the applicant pool. The group includes representatives from Office of Minority and Women Inclusion (OMWI), the Office of Human Resources (OHR), the Office of External Affairs and Communications (OEAC), three regional Division of Management Services offices, and employee representatives. This collaborative effort enabled NCUA representatives to participate in 44 recruitment, outreach, and partnership activities in FY24.

FY24 saw an increase in recruitment, outreach, and partnership events with minority-serving institutions and organizations, with candidates with skills in finance, accounting, management, information technology, and human resources. In 2024, the NCUA also partnered with a virtual platform vendor to establish and produce three successful targeted NCUA-only recruitment and outreach events for Hispanics and women. The events drew participants with backgrounds in finance, human resources, accounting, and management.

**Intern Programs**

The NCUA benefits from the diverse perspectives, talent, skills, and experiences interns bring to the agency. In return, interns experience an enriching learning opportunity, gain experience in a federal government setting, and build professional experience as they support meaningful projects. The NCUA sponsored students in four distinct intern programs in 2024: Contract Internship Program, the OPM Pathways Program, the U.S. Department of Labor Workforce Recruitment Program, and the Mayor Marion S. Barry Summer Youth Employment Program (MBSYEP). The NCUA received an "Outstanding Host Award" for the 2024 MBSYEP, in recognition of our outstanding commitment and dedication to the MBSYEP. The NCUA was one of 12 award recipients out of over 700 hosts.

**Business Activities Outreach**

During FY24, the NCUA's outreach strategy consisted of a mix of participation in external business conferences and targeted capabilities briefings based on agency market research needs. This outreach strategy has allowed the agency to communicate its mission and contracting needs and to identify interested and capable vendors. Participation in national external events is a cost-effective way for the NCUA to optimize its outreach efforts, as these events attract thousands of business-ready suppliers.

Blending business conference outreach with focused market research for contracts requirements has been a consistently effective approach to identify qualified diverse vendors to participate in and be awarded NCUA's contracts over the past several years.


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**CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

 am the  
(Insert Name Above) (Insert official  
title/series/grade above)

Principal EEO 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.

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Agency Head or Agency Head Designee



\_\_\_\_\_  
Date

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## Agency Self-Assessment Checklist

## Essential Element: A Demonstrated Commitment From agency Leadership

 Compliance Indicator		Measure Has Been Met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A
 Measures	A.1. The agency issues an effective, up-to-date EEO policy statement.			
A.1.a. Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "Yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]		X		Statement posted on the agency's external site on 8/29/2023 and sent to employees on 09/25/2023. 9/25/2023
A.1.b. Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.		X		Other bases covered are political affiliation, parental and marital status, military service, and any other non-merit-based factor.

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## Agency Self-Assessment Checklist

Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes	No	N/A	
	A.2. The agency has communicated EEO policies and procedures to all employees.				
A.2.a. Does the agency disseminate the following policies and procedures to all employees:					
A.2.a.1. Anti-harassment policy? [see MD 715, II(A)]		X			
A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		X			
A.2.b. Does the agency prominently post the following information throughout the workplace and on its public website:					
A.2.b.1. The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]		X			
A.2.b.2. Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]		X			
A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.		X			<a href="https://ncua.gov/files/publications/careers/reasonable-accommodation-policy-procedures.pdf">https://ncua.gov/files/publications/careers/reasonable-accommodation-policy-procedures.pdf</a>
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 and the means by which such training is delivered.		X			New employee orientation, new supervisor training, and every 2 years via No FEAR Act Training.
A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.		X			New employee orientation, new supervisor training, and every 2 years via No FEAR Act Training.
A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.		X			New employee orientation, new supervisor training, and every 2 years via No FEAR Act Training.
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.		X			Every 2 years via No FEAR Training, Periodic Anti-Harassment Training.

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Agency Self-Assessment Checklist

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.

X

New employee orientation, new supervisor training, every 2 years via No FEAR Act Training, periodic Anti-Harassment Training.

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	A.3. The agency assesses and ensures EEO principles are part of its culture.	Yes	No	N/A	

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. .

X

Annual Diversity and Inclusion Award and Employee Resource Group Above and Beyond awards recognizing activities that support EEO efforts and outcomes.

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]



X

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## Agency Self-Assessment Checklist





## Essential Element: B Integration of EEO into the agency's Strategic Mission

 Compliance Indicator		Measure Has Been Met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A
 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.			
	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)]	X		
	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.			X
	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)]	X		
	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]	X		
	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.	X		The Agency Chairman and the Chief of Staff were briefed on September 30, 2024. The Executive Director and Deputy Executive Director were briefed on September 19, 2024.
	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)]	X		

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## Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	B.2. The EEO Director controls all aspects of the EEO program.				
	B.2.a. Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] If not, identify the office with this authority in the comments column.	X			
	B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]	X			
	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.]	X			
	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.]	X			
	B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	X			
	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)]	X			
	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); (c)(3)]			X	NCUA does not have subordinate-level components.
	Compliance Indicator	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures	Yes	No	N/A	
	B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.				
	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)]	X			
	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.	X			See NCUA strategic goal 3.1 (Attract, develop, and retain an engaged, high-performing, diverse workforce within an inclusive, professional environment.) for overview of principles.

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**Agency Self-Assessment Checklist**

 <b>Compliance Indicator</b>		<b>Measure Has Been Met</b>			<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
 <b>Measures</b>		Yes	No	N/A	
	B.4. The agency has sufficient budget and staffing to support the success of its EEO program.				
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)]	X			
	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]	X			
	B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	X			
	B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	X			
	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)]	X			
	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.	X			
	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)]			X	NCUA does not have subcomponents and does not have separate EEO programs within its three regional offices.
	B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	X			
	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.	X			
	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]	X			
	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]	X			
	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)]	X			
	B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	X			
	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?	X			
	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?	X			

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**Agency Self-Assessment Checklist**

 Compliance Indicator	B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	

B.5.a. Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:

B.5.a.1. EEO complaint process? [see MD-715(II)(B)]	X			
B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]	X			
B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]	X			
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)]	X			
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)]	X			

 Compliance Indicator	B.6. The agency involves managers in the implementation of its EEO program.	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	



B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	X			
B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	X			
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]	X			
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)]	X			

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Agency Self-Assessment Checklist



Essential Element: C Management and Program Accountability

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
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.				X	NCUA does not have subordinate-level components, but the NCUA does conduct an assessment throughout the year to ensure the regions are providing the required No FEAR Act information to new hires during the onboarding process.
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.				X	NCUA does not have subordinate-level components.
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)]				X	NCUA does not have subordinate-level components.

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
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)]	C.2. The agency has established procedures to prevent all forms of EEO discrimination.	X			
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]		X			
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)]		X			
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)]		X			
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.]		X			
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 Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.		X			
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)]		X			
C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]		X			
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)]		X			
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)]		X			
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)]		X			
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)]		X			
C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, 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, excluding ongoing interpretative services, in the comments column.		X			
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)]		X			

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## Agency Self-Assessment Checklist

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.		X			<a href="https://ncua.gov/about/diversity-inclusion/workplace-resolutions/pas-fact-sheet">https://ncua.gov/about/diversity-inclusion/workplace-resolutions/pas-fact-sheet</a>
 <b>Compliance Indicator</b>	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	<b>Measure Has Been Met</b>			<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
 <b>Measures</b>		Yes	No	N/A	
C.3.a. Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?		X			
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]		X			
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)]		X			
C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]		X			
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]		X			
C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]		X			
C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]		X			
C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]		X			
C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]		X			
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)]		X			
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)]				X	No such failures have been detected.
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)]				X	No such failures have been detected.

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## Agency Self-Assessment Checklist

Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes	No	N/A	
	C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.				
	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)]	X			
	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]	X			
	C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	X			
	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)]	X			
	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)]	X			
	C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	X			The OMWI and OHR partner on all recruitment outreach efforts and both are chair and co-chair respectively of the agency's Recruitment Outreach Working Group (ROWG). ROWG's membership consists of members from OMWI, OHR, OEAC, the three Regions, and the ERG Presidents. ROWG's mission is to streamline the agency's recruitment and recruitment outreach efforts and resources.
	C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]	X			
	C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	X			
	C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.				
	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 Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	X			
	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.			X	No discipline or sanction actions due to discriminatory conduct have been processed.
	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 (e.g., post mortem to discuss lessons learned)? [see MD-715, II(C)]	X			
	Compliance Indicator	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures	Yes	No	N/A	
	C.6. The EEO office advises managers/supervisors on EEO matters.				
	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.	X			EEO Director met monthly with the agency Chairman and regularly with the Office of the Executive Director.
	C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	X			

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## Agency Self-Assessment Checklist





## Essential Element: D Proactive Prevention

 Compliance Indicator		Measure Has Been Met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.			
	D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	X		
	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; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	X		
	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)]	X		
	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)			
	D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	X		
	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)]	X		
	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)]	X		
	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, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.	X		Data sources include internally hosted data repositories to ensure safety of PII. Data are collected through OHR, OMWI, and ERGs.

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## Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	D.3. The agency establishes appropriate action plans to remove identified barriers.				
	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)]	X			
	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)]	X			
	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.				
	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.	X			<a href="https://ncua.gov/files/publications/disability-affirmative-action-plan-2023.pdf">https://ncua.gov/files/publications/disability-affirmative-action-plan-2023.pdf</a>
	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)]	X			
	D.4.c. Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR §1614.203(d)(1)(ii)(A)]	X			
	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)]	X			

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Agency Self-Assessment Checklist

Essential Element: E Efficiency

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## Agency Self-Assessment Checklist

Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes	No	N/A	
	E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.				
	E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	X			
	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)?	X			
	E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	X			
	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.	X			The acceptance letter is usually issued within 30 days of receipt of the formal complaint.
	E.1.e. Does the agency ensure that 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)?	X			
	E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	X			
	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)?	X			
	E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	X			
	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)?	X			
	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.	X			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.

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## Agency Self-Assessment Checklist

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)]		X			
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)]		X			
 <b>Compliance Indicator</b>	E.2. The agency has a neutral EEO process.	<b>Measure Has Been Met</b>			<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
 <b>Measures</b>		Yes	No	N/A	
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)] If "yes", please explain.		X			The Office of General Counsel is the defensive authority for the agency.
E.2.b. When seeking legal sufficiency reviews, does the EEO office have 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.		X			Another attorney in the Office of General Counsel (one who does not represent the agency in personnel cases) conducts this review. This person is the Special Counsel to the General Counsel.
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)]		X			Another attorney in the Office of General Counsel (one who does not represent the agency in personnel cases) conducts this review. This person is the Special Counsel to the General Counsel.
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)]		X			
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, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]		X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.				
	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)]	X			
	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)]	X			
	E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	X			
	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)]	X			
	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)]	X			
	E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	X			

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Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes	No	N/A	
	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.				
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)]		X			
E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]		X			
E.4.a.3. Recruitment activities? [see MD-715, II(E)]		X			Per the Dodd-Frank Act, Section 342, OMWI reports its recruitment outreach efforts annually to Congress in the annual report to Congress, both OMWI and OHR report annually to OPM via the Federal Equal Opportunity Recruitment Program and the Disabled Veterans Affirmative Action reports respectively, and OMWI annually to the EEOC via the MD-715 report.
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)]		X			
E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		X			
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]		X			
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]		X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
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.		X			Human capital dashboards, climate survey, FEVS results, and workforce trend data are all reviewed.
E.5.b. Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.		X			The Agency EEO Director meets regularly with counterparts from other agencies and discusses best practices in areas including strategy and implementation (e.g., value initiatives, position descriptions, etc.).
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)]		X			

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**Agency Self-Assessment Checklist**



**Essential Element: F Responsiveness and Legal Compliance**

	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures	F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.	Yes	No	N/A	
		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)]	X			
		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)]	X			
		F.1.c. Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	X			
		F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	X			
		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)]	X			
	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures	F.2. The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Yes	No	N/A	
		F.2.a. Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	X			
		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)]	X			
		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]	X			
		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)]	X			
		F.2.a.4. Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	F.3. The agency reports to EEOC its program efforts and accomplishments.				
	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)]	X			
	F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	X			

Essential Element: O Other

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**Plan to Attain Essential Elements**

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## Plan to Eliminate Identified Barriers

## PART I.1

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - A3				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Trigger 1: The NCUA has an underrepresentation of Hispanics/Latinos across the agency, most notably in the higher grades (CU12 to Senior Staff Position) and including both managers and executives. These triggers were identified by reviewing tables A1, A3, and the alternate pay tables for NCUA versus EEOC-provided benchmarks.				
STATEMENT OF BARRIER GROUPS:	<b>Barrier Group</b> Hispanic or Latino Males Hispanic or Latino Females				
Barrier Analysis Process Completed?:	N				
Barrier(s) Identified?:	N				
STATEMENT OF IDENTIFIED BARRIER:  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table><tr><th>Barrier Name</th><th>Description of Policy, Procedure, or Practice</th></tr><tr><td>N/A</td><td>No policy, procedure or practice had been identified as of end FY24 that explains the low Hispanic representation.</td></tr></table>	Barrier Name	Description of Policy, Procedure, or Practice	N/A	No policy, procedure or practice had been identified as of end FY24 that explains the low Hispanic representation.
Barrier Name	Description of Policy, Procedure, or Practice				
N/A	No policy, procedure or practice had been identified as of end FY24 that explains the low Hispanic representation.				

## Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
01/01/2025	12/31/2026	Yes			Review vendor recommendations for final report submitted in November 2024 and develop an action plan and implement recommendations to follow EEOC-suggested barrier analysis steps.

## Responsible Official(s)

Title	Name	Standards Address The Plan?
OHR Director	Felicia Purifoy, Acting	Yes
OMWI/EEO Director	Miguel A. Polanco	Yes

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## Plan to Eliminate Identified Barriers

## Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2025	Develop an action plan and commence implementation based on vendor recommendations to eliminate identified barriers for Hispanic/Latino representation at the NCUA.	Yes		

## Report of Accomplishments

Fiscal Year	Accomplishments
2024	The National Recruiter in OHR, in partnership with OWMII, enhanced outreach initiatives to amplify diverse applicant pools. This includes forging stronger alliances with colleges and universities, diversity networks, and bolstering the visibility of recruitment tools available to managers and recruitment teams.
2025	Complete barrier analysis on Hispanics or Latinos and share findings and recommendations with senior leadership.
2018	Established CULTURA, a Hispanic/Latino-focused Employee Resource Group (ERG) that strengthens the support, community, and sense of belonging of Hispanic/Latino employees.
2023	OMWI partnered with CULTURA to establish professional relationships with Hispanic Serving Institutions (HSIs) to promote an increased pipeline of highly qualified Hispanic/Latino applicants.
2019	Chartered the Culture, Diversity & Inclusion Council (CDIC) to advise leadership. CULTURA has a dedicated seat on this council and represents the voice of Hispanic/Latino employees.
2022	Created a new position and hired a National Recruiter in the OHR.
2023	The National Recruiter in OHR, in partnership with OWMII, enhanced outreach initiatives to amplify diverse applicant pools. This includes forging stronger alliances with colleges and universities, diversity networks, and bolstering the visibility of recruitment tools available to managers and recruitment teams.
2022	In December 2022, the NCUA awarded a contract to study and identify barriers to Hispanic/Latino representation and retention in the agency. Conducted the Hispanic barrier analysis process in 2023 and projects submitting a final report by FY24.

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## Plan to Eliminate Identified Barriers

## PART I.2

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - A6				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Trigger 2: NCUA Credit Union Examiners (CU-0580-11, a mission-critical occupational series) must pass a three-part exam (Principal Examiner Exam, or PE exam) to be eligible for promotion to Principal Examiner (CU-0580-12). Credit Union Examiners comprise approximately 68% of the NCUA workforce. Historically, several protected classes have lower pass rates than majority groups. This condition was initially recognized from an OPM annual adverse impact report that monitors exam pass rates by various protected classes.				
STATEMENT OF BARRIER GROUPS:	<b>Barrier Group</b> All Women Hispanic or Latino Females Black or African American Males Black or African American Females				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER:  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table><tr><th>Barrier Name</th><th>Description of Policy, Procedure, or Practice</th></tr><tr><td>Blocked Pipeline</td><td>For occupational series 0580, there is an exam requirement as part of the process to be promoted to CU-0580-12 (Principal Examiner).</td></tr></table>	Barrier Name	Description of Policy, Procedure, or Practice	Blocked Pipeline	For occupational series 0580, there is an exam requirement as part of the process to be promoted to CU-0580-12 (Principal Examiner).
Barrier Name	Description of Policy, Procedure, or Practice				
Blocked Pipeline	For occupational series 0580, there is an exam requirement as part of the process to be promoted to CU-0580-12 (Principal Examiner).				

## Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
09/30/2022	12/30/2024	Yes			The initial barrier analysis conducted by OPM identified 12 perceived barriers. Since then, the number of barriers has decreased to 9. OHR is implementing a plan to eliminate or mitigate their impact on Credit Union Examiners' career progression.

## Responsible Official(s)

Title	Name	Standards Address The Plan?
OMWI/EEO Director	Miguel A. Polanco	Yes
OHR Director	Felicia Purifoy, Acting	Yes

National Credit Union Administration

For period covering October 1, 2023 to September 30, 2024

## Plan to Eliminate Identified Barriers

## Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2023	Implement the Principal Examiner Development Program Instruction once approved. The development program will provide opportunities for examiners who need additional exposure to complex issues to participate in complex exams outside their group or region in a training capacity. The program also provides opportunities for additional developmental details with an NCUA subject matter expert (SME) or specialist.	Yes	12/31/2025	

## Report of Accomplishments

Fiscal Year	Accomplishments
2024	NCUA collaborated with OPM to create or revise 253 PE Multiple Choice Test questions. The questions were pilot-tested by 28 PEs with 1 to 9 years of experience as a CU-12. The process resulted in identifying the appropriate level of complexity for all 253 questions, and it also identified appropriate passing scores for future tests.
2023	In OPM's most recent NCUA Promotional Process Adverse Impact Results report, there was no adverse impact (ALL ATTEMPTS) for the Job Simulation Exercise and Structured Interview Panel across race/ethnicity, gender, age, and disability status groups. For the Job Knowledge Assessment (Multiple Choice Test), there was an adverse impact (ALL ATTEMPTS) on four race/ethnicity categories; however, if one more tester in each of those categories had passed the test, then that category would not have been reported as an adverse impact. There was no adverse impact (ALL ATTEMPTS) in the Job Knowledge Assessment (Multiple Choice Test) in the gender, age, and disability status groups.
2023	Developed multiple resources for both testers and their supervisors to enhance support and exposure needed to further the success of program completion, including:  1.) Supervisory Examiner (SE) Checklist; purpose is to enhance SE collaboration for CU-11's preparing for the PE Certification Exams. Deployment is dependent upon approval of the PE Program Instruction.  2.) Principal Examiner (PE) Development Program Training Report; purpose is for supervisors and examiners to collaboratively track completion of exams, review the Principal Examiner Development Program Tracking Report with the examiner to discuss examiner progress and identify potential knowledge gaps to be addressed. Deployment is dependent upon approval of the PE Program Instruction.
2023	Developed and hosted preparation workshops for the two PE Certification Program assessment tests and the Structured Interview Panel. The interactive workshops are hosted via Microsoft Teams at least 30 days before a testing/interview cycle. The workshops are recorded and available in NCUA's learning management system, allowing examiners who were unable to attend a live session to view archived workshops. Preparation workshops were a product of the working group convened in 2021 to address the perceived barriers listed in OPM's report from the NCUA Examiner Career Development and Principal Examiner Certification Program Preparation Survey.
2020	To identify potential barriers, OPM developed and conducted the NCUA Examiner Career Development and Principal Examiner Certification Program Preparation Survey. Based on survey results that identified 12 perceived barriers, the NCUA established a working group to help create and develop processes and tools to eliminate or mitigate each barrier. Recommendations from the working group included providing testers with more direct feedback for failed Job Simulation Exercise attempts, providing testers with additional exposure opportunities for complex credit union examinations, providing testers with assessment test preparation instruction, and providing new examiners with a career progression road map.

**National Credit Union Administration**

**For period covering October 1, 2023 to September 30, 2024**

**Plan to Eliminate Identified Barriers**

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2021	Informed testers about the availability of reasonable accommodations as related to assessment testing. Panel members responsible for grading assessments provide verbal feedback to testers who fail the Job Simulation Exercise to discuss specific test content. Panel members can share how and why a tester failed to provide a sufficient response to a Job Simulation Exercise question. Enhanced feedback was a product of the working group convened in 2021 to address the perceived barriers listed in OPM's report from the NCUA Examiner Career Development and Principal Examiner Certification Program Preparation Survey,
2021	Developed the Examiner Career Development and Principal Examiner Certification Process Checklist to provide examiners a "road map" to assist in understanding and achieving career milestones. The checklist was a product of the working group convened in 2021 to address the perceived barriers listed in OPM's report from the NCUA Examiner Career Development and Principal Examiner Certification Program Preparation Survey.

National Credit Union Administration

For period covering October 1, 2023 to September 30, 2024

## Plan to Eliminate Identified Barriers

## PART I.3

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - A1				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Trigger 3: For several years, it has been noted that women's representation at NCUA has consistently been about five percentage points below the Civilian Labor Force (CLF). In FY24, we compared NCUA against a more appropriate benchmark comprised of Bureau of Labor Statistics (BLS) state occupational series tables and noted that total women are still underrepresented by about 3.4 percentage points, Hispanic or Latina Females are underrepresented by 0.85 percentage points, and White Females are underrepresented by 4.7 percentage points. The status can be seen in Table A1; note that the alternative benchmark is the BLS state and occupational series values.				
STATEMENT OF BARRIER GROUPS:	<b>Barrier Group</b> All Women Hispanic or Latino Females White Females				
Barrier Analysis Process Completed?:	N				
Barrier(s) Identified?:	N				
STATEMENT OF IDENTIFIED BARRIER:  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table><tr><th>Barrier Name</th><th>Description of Policy, Procedure, or Practice</th></tr><tr><td>N/A</td><td>As of the end of FY24, no policy, procedure, or practice has been identified to explain the underrepresentation of women.</td></tr></table>	Barrier Name	Description of Policy, Procedure, or Practice	N/A	As of the end of FY24, no policy, procedure, or practice has been identified to explain the underrepresentation of women.
Barrier Name	Description of Policy, Procedure, or Practice				
N/A	As of the end of FY24, no policy, procedure, or practice has been identified to explain the underrepresentation of women.				

## Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
01/01/2023	10/01/2025	Yes			The agency has plans to investigate women's underrepresentation during FY2025–FY2026.

## Responsible Official(s)

Title	Name	Standards Address The Plan?
OHR Director	Felicia Purifoy, Acting	Yes
OMWI/EEO Director	Miguel A. Polanco	Yes

## Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
10/01/2025	NCUA begins implementing changes.	Yes		

**National Credit Union Administration**

**For period covering October 1, 2023 to September 30, 2024**

**Plan to Eliminate Identified Barriers**

**Planned Activities Toward Completion of Objective**

<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
10/01/2025	NCUA completes analysis of underrepresentation of women and develops an action plan based on findings and recommendations,	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2023	The NCUA began reviewing data, policies, procedures, and practices. The NCUA then issued a barrier analysis survey to the workforce, including questions germane to the agency's female population.

National Credit Union Administration

For period covering October 1, 2023 to September 30, 2024

## Plan to Eliminate Identified Barriers

## PART I.4

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - A3				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Trigger 4: In FY22, the NCUA observed underrepresentation in its executive ranks for all races, national origin (RNO), and gender groups except for White Males, White Females, All Males, and Black or African American Males. Over the last two years, underrepresentation in many of the original FY22 observations are no longer of concern. As of FY24, the NCUA still has underrepresentation in its executive ranks for Hispanic or Latina Female, Asian Female, and Asian Male groups. The underrepresentation of Hispanic Females is primarily due to an underrepresentation across the upper grades, CU-12 to CU-15, which eventually feed into the executive positions. This issue is being addressed in Triggers 1 and 2 above. In contrast, the executive feeder population of Asian Males and Females is sufficient to expect some representation in executive positions; however, the underrepresentation is limited to one Asian Male and one Asian Female. These triggers were identified by reviewing the A-3 data table compared with the CLF and a custom table of race and gender representation of the CU-15 feeder group.				
STATEMENT OF BARRIER GROUPS:	<b>Barrier Group</b> Hispanic or Latino Females Asian Males Asian Females				
Barrier Analysis Process Completed?:	N				
Barrier(s) Identified?:	N				
STATEMENT OF IDENTIFIED BARRIER:  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table><tr><th>Barrier Name</th><th>Description of Policy, Procedure, or Practice</th></tr><tr><td>N/A (Possible Glass Ceiling in Executive Positions)</td><td>While the disparity in representation at senior levels compared with the CLF and Upward Mobility Benchmark indicates possible institutional/structural barriers to advancement, the agency has not identified a specific policy, procedure, or practice as of the end of FY24 that would cause these disparities.</td></tr></table>	Barrier Name	Description of Policy, Procedure, or Practice	N/A (Possible Glass Ceiling in Executive Positions)	While the disparity in representation at senior levels compared with the CLF and Upward Mobility Benchmark indicates possible institutional/structural barriers to advancement, the agency has not identified a specific policy, procedure, or practice as of the end of FY24 that would cause these disparities.
Barrier Name	Description of Policy, Procedure, or Practice				
N/A (Possible Glass Ceiling in Executive Positions)	While the disparity in representation at senior levels compared with the CLF and Upward Mobility Benchmark indicates possible institutional/structural barriers to advancement, the agency has not identified a specific policy, procedure, or practice as of the end of FY24 that would cause these disparities.				

## Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
09/30/2022	12/31/2025	Yes	11/14/2024		An independent review of data and policies was conducted in FY23/FY24, and the vendor recommendations are being reviewed by senior leadership in FY25.

## Responsible Official(s)

Title	Name	Standards Address The Plan?
OHR Director	Felicia Purifoy, Acting	Yes
OMWI/EEO Director	Miguel A. Polanco	Yes

**National Credit Union Administration**

**For period covering October 1, 2023 to September 30, 2024**

**Plan to Eliminate Identified Barriers**

**Planned Activities Toward Completion of Objective**

<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
12/31/2025	Monitor Asian Male and Female representation in executive positions.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2024	Complete barrier analysis on Hispanics or Latinos and share findings and recommendations with senior leadership.
2022	The NCUA completed its award of the barrier analysis contract in December 2022 to identify barriers to Hispanic representation and retention at the agency.
2023	The vendor began a barrier analysis study, which included administering a survey and focus groups, analyzing the data, and identifying preliminary barriers and mitigation recommendations.

**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 affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

**Section I: Efforts to Reach Regulatory Goals**

EEOC regulations (29 CFR § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with 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)	Answer	No
b.Cluster GS-11 to SES (PWD)	Answer	No

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

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)	Answer	No
b.Cluster GS-11 to SES (PWTD)	Answer	No

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

Although NCUA does not have specific numerical goals, the OHR developed a human capital dashboard that displays current disability representation for all hiring managers and recruiters to see.

**Section II: Model Disability Program**

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

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

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.

Answer Yes

N/A

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	
Section 508 Compliance	0	0	1	Nickol Davenport, Website Admin/ Section 508 Coordinator, OEAC, edavenport@ncua.gov
Processing reasonable accommodation requests from applicants and employees	1	1	0	Vanessa Jackson, HR Specialist, OHR, vjackson@ncua.gov Tiffany Thompkins, HR Specialist, OHR, tthompkins@ncua.gov
Answering questions from the public about hiring authorities that take disability into account	10	0	0	Jodi Johnson, Director Staffing and Classification, OHR, jejohnson@ncua.gov; Lisa Bazemore, Lead HR Specialist, OHR, mbazemore@ncua.gov; Homayra Jami, Lead HR Specialist, OHR, hjami@ncua.gov; Lauren Portwood, HR Specialist, OHR, LPortwood@ncua.gov; Amanda Brown, HR Specialist, OHR, abrown@ncua.gov; Jasmin Sneed, HR Specialist, OHR, jsneed@ncua.gov; Michele Sullivan, HR Specialist, OHR, masullivan@ncua.gov; Wayne Shrader, HR Specialist, OHR, sshader@ncua.gov; Kayla Greene, HR Specialist, OHR, kgreene@ncua.gov; Doreen Rizopoulos, National Recruiter, OHR, drizopoulos@ncua.gov
Processing applications from PWD and PWTD	10	0	0	Jodi Johnson, Director Staffing and Classification, OHR, jejohnson@ncua.gov; Lisa Bazemore, Lead HR Specialist, OHR, mbazemore@ncua.gov; Homayra Jami, Lead HR Specialist, OHR, hjami@ncua.gov; Lauren Portwood, HR Specialist, OHR, LPortwood@ncua.gov; Amanda Brown, HR Specialist, OHR, abrown@ncua.gov; Jasmin Sneed, HR Specialist, OHR, jsneed@ncua.gov; Michele Sullivan, HR Specialist, OHR, masullivan@ncua.gov; Wayne Shrader, HR Specialist, OHR, sshader@ncua.gov; Kayla Greene, HR Specialist, OHR, kgreene@ncua.gov; Doreen Rizopoulos, National Recruiter, OHR, drizopoulos@ncua.gov
Architectural Barriers Act Compliance	0	0	1	Joseph Hartley, Facility Management Specialist, OCFO, jhartley@ncua.gov
Special Emphasis Program for PWD and PWTD	0	0	1	Holly Aguilar, Diversity Specialist, OMWI, HAguilard@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.

Answer Yes

OMWI attended the annual 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, including those related to PWD and PWTD. New HR specialists are trained by senior specialists on the agency disability program and responsibilities. OMWI's Disability Employment Program Manager keeps up to date through cyberFEDS and other resources regarding disability issues.

## **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

Answer      Yes

N/A

## **Section III: Plan to Recruit and Hire Individuals with Disabilities**

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

### **A. PLAN TO IDENTIFY JOB APPLICATIONS 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 several activities to enhance outreach to individuals with disabilities. These efforts include: - Maintaining a "talent bank" of Schedule A applicants who apply for agency positions. - Participating in targeted outreach events for people with disabilities. - Expanding the NCUA's outreach through LinkedIn Recruiter and the USAJOBS Resume Mining tool to reach qualified applicants, including those with disabilities. - Offering the Workforce Recruitment Program Services as an additional resource for managers to source potential applicants to fill vacant positions, in addition to the regular competitive recruitment process. - Distributing NCUA vacancy announcements to a newly established email distribution list of potential applicants who have expressed interest in NCUA opportunities during recruitment and outreach events.

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 uses all available and appropriate hiring authorities to employ persons with disabilities. The NCUA's recruitment and outreach efforts included the following: - Using LinkedIn, a tool that allows the NCUA to expand outreach efforts to a more qualified pool of applicants, to include targeting and connecting with various disabled veterans' groups and communities on LinkedIn. - Distributing NCUA vacancy announcements to a variety of organizations, colleges, and universities through the digital tool Handshake. This outreach effort includes veterans' organizations and organizations focused on hiring qualified individuals with disabilities. - Posting all NCUA vacancy announcements on targeted websites to ensure maximum distribution to a qualified audience, which includes individuals with disabilities. - Maintaining a talent bank of Schedule A applicants, which includes disabled veterans who apply for positions with the agency. - Using the USAJOBS Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a disability rating of 30 percent or more. - Distributing NCUA vacancy announcements to an email distribution list of potential applicants who have expressed interest in NCUA opportunities during recruitment and outreach events. - Leveraging social media channels established by the NCUA's Office of External Affairs and Communications to announce the NCUA's participation at recruitment outreach events. Additionally, the Disability Employment Program Manager served as a Workforce Recruitment Program recruiter for the Department of Labor applicant database, interviewing potential qualified Schedule A applicants from assigned colleges and universities.

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 Selective Placement Manager uses a searchable Schedule A candidate database to assist hiring managers. Human Resources Staffing Specialists discuss the process and review the Schedule A database with managers for each recruitment during the strategic conversation pipeline step for recruitment/hiring. 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. When Schedule A candidates apply to agency postings through a vacancy announcement, their resume package is reviewed to determine their qualifications and eligibility. Thereafter, qualified candidates are forwarded to the hiring official on a referral list for consideration. Once the candidate's application and supporting documentation are received, the coordinator will conduct a qualifications analysis of all materials submitted. After a careful review, candidates are notified of their status (qualified/not qualified). Qualified candidates are added to the agency's Schedule A database. Each HR Specialist is required to review the database prior to posting the vacancy announcement and refer qualified candidates to the hiring manager (at the hiring manager'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.

Answer Yes

The agency has a supervisory orientation program where new supervisors receive training on EEO laws and procedures, harassment laws, and an overview of alternative dispute resolution. New supervisors also gain access to the Supervisor Resource Center which provides an overview of training requirements as well as immediate access to external training, webinars, and job aids. Additionally, the Schedule A job aid tool in the NCUA Learning Management System LAMP covers the hiring authority details and answers several commonly asked questions. In addition, new supervisors receive in-person training on the Schedule A hiring authority and process during the strategic conversation pipeline step of recruitment/hiring. The agency offers hiring managers Recruitment and Hiring Flexibilities training throughout the year to include a 4-hour Recruitment Bootcamp for managers with a large focus on flexible hiring authorities for PWD and PWTD. Additionally, the OMWI manages the disability solutions desk mailbox for questions or concerns for any disability-related issue.

## 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 agency's recruitment strategy includes a strong focus on outreach to PWDs and PWTDs. In sourcing candidates, we utilized multiple resume databanks, such as the Department of Labor's Workforce Recruitment Program (WRP) and OPM's USAJOBS Agency Talent Portal, which has a direct sourcing search for potential qualified PWDs/PWTDs. We attended multiple disability-focused career fairs, such as OPM's "Bender List" and "Level up for Federal Government", both in person and virtually to maximize access. We have established partnerships with universities and colleges such as Gallaudet University and Rochester Institute of Technology - National Institute for the Deaf. The NCUA also participated in mock interviews with students at Gallaudet University. Current NCUA employees have the following programs available to assist and support to help provide reasonable accommodations. - Reasonable Accommodations Support Services: • American Sign Language (ASL) • Communications Access Realtime Translation (CART) • Virtual Remote Interpretation (VRI) • Mobility Services • Specialized Computer Equipment • Ergonomic Assessments - Employee Assistance Program (EAP) - WorkLife4U. Lastly, the agency had a robust training and development program, described in Section A. ADVANCEMENT PROGRAM PLAN below.

## 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)  | Answer | Yes |
| b. New Hires for Permanent Workforce (PWTD) | Answer | No  |

PWD: Only 9 out of 81 (11.11%) permanent new hires were PWD. This is less than 1 hire below the 12% benchmark and likely to be due to random variation. See Table B8.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

Although there were 163 PWD out of 2785 (5.85%) total qualified applicants, only 3 PWD out of 56 (5.36%) selections made. This slight decrease is less than one selection and is likely to be due to normal variation. See Table B7P.

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                                       |        |     |
|---------------------------------------|--------|-----|
| a. Qualified Applicants for MCO (PWD) | Answer | Yes |
|---------------------------------------|--------|-----|

b. Qualified Applicants for MCO (PWTD)

Answer Yes

PWD: Although there were 23 PWD out of 299 (7.69%) total qualified applicants, only 1 PWD out of 41 (2.44%) selections were made. PWTD: Although there were 14 PWTD out of 299 (4.68%) total qualified applicants, 0 PWTD out of 41 (0.00%) selections were made. In both cases, the small difference is not statistically significant and is likely due to random variation. See Table B9P.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Promotions for MCO (PWD)

Answer Yes

b. Promotions for MCO (PWTD)

Answer Yes

PWD: There were 25 PWD out of 299 (8.36 percent) qualified applicants, but only three PWD out of 54 employees (5.36 percent) on-boarded. This difference is fewer than two employees. PWTD: There were 14 PWTD out of 299 qualified applicants (4.68 percent), but only two PWTD out of 54 employees (3.57 percent) on-boarded. This difference is fewer than one employee and is well above the 2.00 percent goal. These triggers are not statistically significant and are likely to be explained by normal variance. Note: Worksheet B9P contains the qualified applicant data; however, the on-board data comes from an external report.

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

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

### A. ADVANCEMENT PROGRAM PLAN

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

The NCUA’s primary occupation is the Credit Union Examiner (CUE), representing close to 70 percent of the agency staff. Entry-level CUE positions are advertised and recruited as career ladder positions with promotion opportunities to a target level of CU-12. CUEs are provided extensive training to develop and reach the full performance level. Note: All CUE announcements are open to Schedule A candidates. The agency also advertises Leadership Development Programs, which are open to all employees at all levels. Briefings are provided to employees prior to the program’s opening to ensure employees understand the development opportunities and the application process and have an opportunity to ask questions. In addition, reasonable accommodations are available to help CUEs be successful in all essential functions of the job, and the Disability Solutions Desk supports on challenges or issues that employees with disabilities may experience.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

NCUA's career development model deploys a two-pronged approach. It focuses, simultaneously, on the development of technical and leadership competencies. The technical aspect of this model is described in Section IV-A above. The leadership development component is described below. NCUA's leadership development efforts are guided by its leadership vision and leadership journey. The leadership vision describes key leadership behaviors expected from leaders at all levels across four key pillars: Inspiring Others, Demonstrating Emotional Intelligence, Driving Results, and Fostering Inclusion. The leadership journey describes growth as a function of seniority, identifying key competencies expected at various levels of responsibility. To formally support leadership development at all levels, the NCUA sponsors the following leadership development programs: (1) Aspiring Leader Program (ALP): NCUA CU 4-6 staff may apply for this two-month program designed to provide competency-based leadership training. (2) New Leader Program (NLP): NCUA CU 7-10 staff may apply for this program designed to develop future leaders. While remaining in their position of record, participants complete a variety of activities including a developmental detail, formal training sessions, management book reviews and interviews, and a team project. (3) Executive Leadership Program (ELP): NCUA CU 11-12 staff are eligible to apply for this program. While remaining in their position of record, participants complete a variety of activities including a developmental detail, formal training sessions, management book reviews and interviews, and a team project. ALP, NLP, and ELP are offered federal government-wide by the Graduate School's Center for Leadership and Management. NCUA nominates individuals using our internal competitive selection process; the Graduate School's Center for Leadership and Management has final approval authority. (4) Management Development Program: an 18-month developmental program for non-supervisors. The Program focuses on learning to lead others. Candidates are exposed to defining project scopes, delegating work, developing others, setting organizational goals, and understanding the broader agency mission. (5) Excellence in Government Fellows offered by the Partnership for Public Service: 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 6 weeks, and spend a total of 24 days in session. (6) NCUA Executive Training Program: an 18-month program for CU-15 employees. This program prepares employees to transition from supervisory or managerial positions into senior executive positions within the agency. In addition to leadership training, NCUA has commissioned and is investing heavily in coaching. Executive Coaching Program: a 12-month program for the NCUA's executive staff. The program is designed to help managers become more highly effective leaders, reinforce leadership competencies, enhance performance, etc. In addition, the agency offers a series of training opportunities through its internal training catalog, external training organizations, agency shadowing assignments, and opportunities to participate in short-term detail assignments. The agency also provides career development opportunities through its agency-wide mentorship program. NOTE: These programs are not presented in Tables A/B12 & 20 because they are available for grade ranges and do not align with the tables. Group Coaching: NCUA offers group coaching to both supervisory and non-supervisory personnel.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Coaching Programs	70	70	13	13	3	3
Internship Programs	1144	12	68	0	40	0
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	37	37	11	11	3	3
Other Career Development Programs	81	37	16	8	4	3
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWD)

Answer No

b. Selections (PWD)

Answer Yes

Although there were 68 qualified PWD out of 1144 (5.94%) applicants to the Pathways Internship Program, there were zero PWD out of 12 (0.00%) were selected. This trigger is fewer than one employee, not statistically significant, and is likely to be explained by normal variance.

4. Do triggers exist for PWTD 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWTD)

Answer No

b. Selections (PWTD)

Answer Yes

Although there were 40 PWTD out of 1144 (3.50%) total applicants to the Pathways interns, there were zero PWTD out of 12 (0.00%) selections made. This trigger is fewer than one employee, not statistically significant, and is likely to be explained by normal variance.

## 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)

Answer No

b. Awards, Bonuses, & Incentives (PWTD)

Answer No

N/A

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)

Answer No

b. Pay Increases (PWTD)

Answer No

N/A

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)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

N/A

## 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

SSP: With 10 PWD out of 144 (6.94%) qualified candidates, zero PWD out of four (0.00%) were selected. CU14: With 20 PWD out of 173 (11.56%) qualified candidates, one PWD out of 22 (4.55%) was selected. These triggers are not statistically significant and are likely to be explained by normal variance (Data from table B11).

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

SSP: With 2/144 (1.39%) qualified candidates, zero out of four (0.00%) selected. CU15: With 10/220 (4.55%) qualified candidates, zero out of 11 (0.00%) selected. CU14: With 11/173 (6.36%) qualified candidates, one out of 22 (4.55%) selected. CU13: With 14/270 (5.19%) qualified candidates, zero out of 16 (0.00%) selected. It should be noted that each of these triggers are a fraction of a person, are not statistically significant, and are likely to be explained by normal variance (Data from table B11).

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

CU-15: From 19/323 (5.88%) qualified to 0/5 (0.00%) selected. CU-13: From 95/1715 (5.54%) qualified to 0/8 (0.00%) selected. These triggers are not statistically significant and are likely to be explained by normal variance. (Data from Table B15)

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

CU15: from 9/323 (2.79%) qualified to 0/5 (0.00%) selected. CU13: from 40/1715 (2.33%) qualified to 0/8 (0.00%) selected. These triggers are not statistically significant and are likely to be explained by normal variance. (Table B15)

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 applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	Yes
b. Managers		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	Yes
c. Supervisors		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A

Executives: from 10/144 (6.94%) qualified to 0/4 (0.00%) selected. Managers: from 15/218 (6.88%) qualified to 0/12 (0.00%) selected. These triggers are not statistically significant and are likely to be explained by normal variance. (Table B19)

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	Yes
b. Managers		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	Yes
c. Supervisors		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A

Executives: from 2/144 (1.39%) qualified to 0/4 (0.00%) selected. Managers: from 10/218 (4.59%) qualified to 0/12 (0.00%) selected. These triggers are not statistically significant and are likely to be explained by normal variance. (from Table B19)

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. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWD)	Answer	No
b. New Hires for Managers (PWD)	Answer	Yes
c. New Hires for Supervisors (PWD)	Answer	N/A

Managers: from 18/245 (7.35%) qualified to 0/3 (0.00%) selected. These triggers are not statistically significant and are likely to be explained by normal variance. (Table B18)

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWTD)	Answer	No
b. New Hires for Managers (PWTD)	Answer	Yes
c. New Hires for Supervisors (PWTD)	Answer	N/A

Managers: from 9/245 (3.67%) qualified to 0/3 (0.00%) selected. This trigger is not statistically significant and is likely to be explained by normal variance. (Table B18)

## Section V: Plan to Improve Retention of Persons with Disabilities

To be 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 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 CFR § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer Yes

N/A

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)	Answer	No
b. Involuntary Separations (PWD)	Answer	Yes

Involuntary Separation Rates = [(RIFs + Removals) / (prior year's end strength)]; using permanent population data from tables B1 and B16. No Disability: 0 RIFs + 5 Removals out of 888 employees (0.56%) PWD: 0 RIFs + 3 Removal out of 206 employees (1.46%).

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)	Answer	No
b. Involuntary Separations (PWTD)	Answer	Yes

Involuntary Separation Rates = (RIFs + Removals)/(prior year's end strength); permanent population data from tables B1 and B16. No Disability: 0 RIFs + 5 Removals out of 888 employees (0.56%). PWTD: 0 RIFs + 2 Removal out of 58 employees (3.45%). This trigger is not statistically significant and is likely to be explained by normal variance.

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.

There were 3 removals; 1 for “improper conduct” and 2 for “unacceptable performance.”

### B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

The internet address on the NCUA's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint is <https://ncua.gov/accessibility> (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.)

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

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

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

The Office of External Affairs and Communications' (OEAC) Section 508 Program team identifies and assists with the remediation of agency information technology. OEAC maintains a Section 508 Resource Center on the internal NCUA Central site for staff and contractors. The resource center offers training, guides, and best practice resources for creating accessible content. The OEAC Section 508 Program team identifies and assists with the remediation of agency information technology. The office also works with content owners and creators to identify and remediate deficiencies. All new NCUA content is required to be accessible before it is posted on the public-facing websites. Accessibility language has been updated in the NCUA Style Guide.

## 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.)

The time frame for processing initial requests for reasonable accommodation averages 10-20 business days, absent extenuating circumstances. The time to process a request depends on the nature of the accommodation requested and the receipt of sufficient supporting information.

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

The NCUA's Reasonable Accommodation (RA) program includes timely processing and approvals of accommodation requests. In CY 2023, a total of 30 reasonable accommodation cases were completed with an average processing time of 25 days. The RA Program Manager tracks by types of accommodations requested, testing accommodations, equipment needs, and full-time telework, as applicable. The NCUA conducts RA training for all new supervisors and plans to conduct four reasonable accommodation refresher training sessions for all supervisors before December 31, 2024. The NCUA's RA Specialist provides consultation services with managers, supervisors, and employees on the reasonable accommodation process and the laws governing reasonable accommodations. The NCUA is proactive regarding the needs of persons with disabilities.

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

Pursuant to 29 CFR §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.

The NCUA Reasonable Accommodation Instruction was finalized on March 28, 2022, and made available to both agency personnel and the public. Guidance on PAS services is incorporated into the updated Instruction. To this date, there have been no requests for PAS services.

## 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?

Answer Yes

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?

Answer No

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?

Answer No

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?

Answer N/A

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.

N/A

## 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?

Answer No

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

Answer N/A

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

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

The NCUA is on track with its implementation plan to mitigate or eliminate the impact of the identified perceived barriers. The review of the PE Certification Program and testing procedures is ongoing. An agency-wide survey of stakeholders was conducted, and the results identified perceived/potential barriers and the catalysts for those barriers. Using this information, the agency created a taskforce of Principal Examiners and Supervisory Examiners to develop training and resources for examiners and supervisors. The training and resources produced by the taskforce will better prepare examiners for the PE Certification Assessment and aim to mitigate barriers.

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

The NCUA used services from the OPM to evaluate the 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 being evaluated by agency leadership in its Talent Management Council (TMC). The NCUA worked closely with OPM on the NCUA Examiner Career Development and Principal Examiner Certification Program Preparation Project. The NCUA developed short-term and long-term strategies to address barriers identified within the survey. The short-term strategies put into place include a community of practice (discussion board) for Supervisory Examiners and examiners, enhanced PE Exam resources made available to examiners, and early exposure to examiners of the PE Certification Program and potential career progression opportunities with detailed briefings offered during their first 12 months of employment with the NCUA. Long-term strategies are being developed between the NCUA and OPM.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

The approach to address perceived and potential barriers is one of our continuous process improvement initiatives. The work of the PE/SE review is ongoing, and the training and resources produced by the review recommendations will be implemented, assessed for effectiveness, and modified as necessary. The agency is in the process of implementing its barrier mitigation plan. The NCUA will actively monitor assessment processes and outcomes to continue to mitigate any identified barriers.