

National Credit Union Administration

For period covering October 1, 2022 to September 30, 2023

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. 1197
	2. Enter total number of temporary employees	2. 31
	3. TOTAL EMPLOYMENT [add lines B 1 through 2]	4. 1228

PART C Agency Official(s) Responsible For Oversight of EEO Program(s)	Title Type	Name	Title
		Head of Agency	The Honorable Todd M. Harper
	Head of Agency Designee	Rendell Jones	NCUA 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	Diversity & Inclusion 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	Vanessa Jackson	Human Resources Specialist
	Reasonable Accommodation Program Manager	Tiffany Thompkins	Human Resources Specialist
	Anti-Harassment Program Manager	Don Names	Associate Counsel, Anti-Harassment Coordinator
	Anti-Harassment Program Manager	Katherine Easmunt	Chief Ethics Counsel, Anti-Harassment Program Director
	ADR Program Manager	Stephanie Smith	Equal Employment Opportunity Specialist
	Compliance Manager	Miguel A. Polanco	OMWI Director
	Principal MD-715 Preparer	James Walter	Diversity Data Analyst
	Other EEO Staff	Terri Finley-Harrigan	Administrative Assistant

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

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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.

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

Accomplishments

Equal Employment Opportunity Policy Statement

As required by the Equal Employment Opportunity Commission (EEOC), NCUA Chairman Todd M. Harper confirmed his commitment to equal employment opportunity (EEO) by issuing the agency's [annual EEO policy statement](#) to all NCUA employees in September 2023.

Culture, Diversity, and Inclusion Council

The Culture, Diversity, and Inclusion Council (CDI Council) assists in building an organizational culture in which shared values, beliefs, and behavioral norms around diversity, equity, inclusion, accessibility (DEIA), engagement, and leadership align with the NCUA's values and strategic priorities to optimize organizational performance. The CDI Council includes employee representatives at all levels (executives, supervisors, and non-supervisors from multiple grade levels) and a wide spectrum of functional areas (such as the examination program, legal, human resources, and information technology). The CDI Council reflects a diverse cross-section of agency employees, including a National Treasury Employees Union representative. CDI Council membership also includes eight employees representing the agency's Employee Resource Groups (ERGs). Continuing and new council members received training during the reporting year.

In 2023, the CDI Council presented their proposed initiatives to the NCUA Chairman, in response to the opportunities identified in the culture and climate survey. The Chairman selected the top three initiatives that supported immediate action. The CDI Council continues its work on the implementation of the three initiatives:

- Employee input mechanisms (means by which employees provide feedback to management and agency leadership);
- Ethics and employee conduct; and
- Employee safety.

In the coming year, the CDI Council will develop new initiatives and continue advancing the implementation of culture and climate survey recommendations.

Employee Resource Groups

The NCUA established ERGs to foster an inclusive environment where employees feel valued, respected, and engaged. ERGs help deepen employees' connections to each other and to the agency's mission through allyship and belonging. Employees and prospective employees can explore the NCUA's recognized ERGs by visiting [Workforce Diversity and Inclusion](#). Each ERG is open to all employees.

In FY23, ERGs expanded their membership from 336 members (28.9 percent of NCUA employees) at the beginning of the year to 507 members (41.3 percent of NCUA employees) by the end of the year. This continues to position the agency well above the industry-standard ERG membership goal of 10 percent of an organization's total workforce.

The agency's ERGs contribute in meaningful ways to support an inclusive work environment for all employees. In addition to providing essential support to members, the ERGs engaged employees in more than 30 events to provide professional development, encourage networking, and retain employees. Also, ERGs regularly support the NCUA's special emphasis program (SEP) observances.

ERGs participated at the NCUA's 2023 National Training Conference with exposition booths to showcase the groups to all employees, in the agency's Recruitment Outreach Working Group (ROWG) efforts, and engaged employees by providing resources, coordinating special presentations, and creating a support system. The following activities and efforts, coordinated and sponsored by ERGs, benefited the agency:

- Identifying and developing emerging leadership talent;
- Fostering a more inclusive work environment for employees;
- Improving working conditions by providing additional resources and support;
- Tackling agency-wide challenges identified by their members; and
- Supporting the 2023 Special Emphasis Program observances.

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

OMWI conducts an ERG Annual Satisfaction Survey to identify ways to increase support for more efficient and effective interactions with ERGs. Support includes:

- Extending ERG Diversity, Inclusion, and Partnership plans;
- Increasing the effectiveness of administrative documents and resources for ERG officers;
- Developing time management and membership engagement tools for ERGs;
- Increasing OMWI participation in officers' meetings for additional support; and
- Continuing to identify opportunities for recognizing and rewarding efforts.

On December 1, 2022, OMWI hosted the agency's third ERG awards ceremony to recognize the accomplishments of ERG officers, executive sponsors, and members with Above and Beyond awards. The NCUA recognized 50 employees for their contributions to the ERGs and for creating an inclusive environment at the NCUA. The awards are given in four categories:

- Professional development;
- Business strategies;
- Workplace culture; and
- NCUA community involvement.

Disability Solutions Desk

OMWI established its Disability Solutions Desk in 2022 as a central point of access to address employee inquiries related to disabilities. Employees can send questions, express concerns and challenges, and offer recommendations related to disabilities. Dedicated OMWI staff review all requests and coordinate responses and support with appropriate program offices. The Disability Solutions Desk has been recognized by the Equal Employment Opportunity Commission as a "Best Practice."

Diversity and Inclusion Award

On May 24, 2023, the agency held its Chairman's Outstanding Achievement Awards ceremony. Each year the Chairman recognizes two NCUA employees for their achievement in diversity and inclusion. One honoree demonstrated organizational values and beliefs through continued efforts to promote and implement various programs, ERGs, and other DEIA initiatives. The second honoree contributed to making the NCUA's information technology systems, websites, and resources more accessible to all agency employees.

Employee Engagement

The NCUA continues its employee engagement planning efforts throughout the agency. Engagement action plans help the agency strengthen its workforce, develop employees' leadership competencies, and attract, develop, manage, and retain the best workforce possible. NCUA offices develop an annual Workforce Engagement Action Plan using the results of the Federal Employee Viewpoint Survey (FEVS), which is administered by the U.S. Office of Personnel Management (OPM).

The FEVS' Employee Engagement Index (EEI) measures conditions that are conducive to employee engagement. The EEI is comprised of three subindices:

- Leaders Lead: reflects employees' perceptions of the integrity of leadership and leadership behaviors (such as communication and workforce motivation);
- Supervisors: reflects the interpersonal relationship between worker and supervisor including trust, respect, and support; and
- Intrinsic Work Experience: reflects employees' feelings of motivation and competency relating to their work roles.

The NCUA's 2023 EEI was 77.1 percent, a 1.1 percentage point increase from 2022. In comparison, the government-wide EEI score is 72 percent and 76 percent for medium-sized agencies, respectively.

In 2023, 82.3 percent of NCUA employees submitted the FEVS, a slight decrease of 0.8 percentage points from 83.1 percent in 2022. In comparison, the response rate government-wide was 39 percent, and the response rate for medium-sized agencies was 65 percent in 2023.

NCUA FEVS Results on Key Indices

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EXECUTIVE SUMMARY: ACCOMPLISHMENTS

FEVS Indices	2023	2022	2021
Employee Engagement Index	77.1%	76.0%	77.0%
Intrinsic Work Experience	76.1%	75.2%	76.0%
Leaders Lead	68.7%	65.3%	69.0%
Supervisors	86.5%	87.3%	85.5%
Global Satisfaction Index	71.9%	65.3%	73.0%
Performance Confidence Index	90.0%	89.5%	90.1%
Diversity, Equity, Inclusion and Accessibility (DEIA) Index	77.0%	76.5%	N/A
Diversity	83.0%	81.8%	N/A
Equity	72.8%	71.2%	N/A
Inclusion	79.6%	80.0%	N/A
Accessibility	73.0%	72.8%	N/A

DEIA Index

OPM's DEIA index assesses employee experiences with DEIA policies, practices, and procedures of the agency and its leaders. The DEIA Index aligns with [Executive Order 14035](#): Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce, which features four factors, which OPM measures in the FEVS through subindices: accessibility, diversity, equity, and inclusion.

The DEIA index reveals that 77.0 percent of NCUA respondents report positive perceptions of agency practices related to DEIA. In comparison, the government-wide DEIA index average was 72 percent and 76 percent for medium-sized agencies in 2023.

Performance Confidence Index

The FEVS Performance Confidence Index measures employees' view that their work unit can achieve goals and produce work at a high level and, ultimately, provides insights into agency performance. The NCUA's Performance Confidence Index for 2023 was 90.0 percent, a 0.5 percentage point increase from 89.5 percent in 2022. In comparison, the government-wide index's average was 83.8 percent, and 89.2 percent for medium-sized agencies for 2023.

Global Satisfaction Index

The FEVS Global Satisfaction Index measures employees' satisfaction with their jobs, pay, and organization and their willingness to recommend their organization as a good place to work. The NCUA's Global Satisfaction Index for 2023 was 71.9 percent, up 6.6 percentage points from 65.3 percent in 2022. This compares to 63.8 percent government-wide and 69.7 percent for medium-sized agencies in 2023.

Engagement Action Plans

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The NCUA adopted the practice of developing employee engagement action plans in 2018 to plan and carry out activities that strengthen the workforce; grow and develop employees' leadership competencies; and ensure the agency can attract, develop, manage, and retain the best workforce possible. Each NCUA office develops a specific workforce engagement action plan using FEVS results each year. The NCUA continues its agency-wide employee engagement planning efforts.

Mentorship Program

The NCUA's formal mentorship program provides mentees with a greater understanding of the organization's mission and expands their knowledge about its structure, environment, and culture outside of their own areas of expertise. This proven best practice promotes communication and collaboration across the organization, thereby increasing staff engagement.

This year's program yielded the highest number of mentorship pairings in the program's history — 47. OMWI incorporated program improvements based on input provided by current and past participants, enabling the program to grow and better suit the needs of its participants.

Program improvements in 2023 included expanding the number of situational mentors available to all employees and adding an interactive mentor café. The café was a facilitated gathering of program mentors approximately 3 months into the year's program, allowing for a safe space to discuss best practices, network, and offer recommendations to improve the program. The mentor café complements last year's addition of the mentee café.

OMWI Talks

Since 2017, the NCUA has hosted informal, facilitated discussions about DEIA-related topics. These conversations offer NCUA employees a safe space to discuss differences and broaden their awareness and understanding of others.

The NCUA continues to leverage the OMWI Talks platform to engage employees in conversations on topics related to DEIA in the workplace. In 2023, the OMWI Talks series continued with conversations on the following topics, with each webcasted event attracting more than 200 participants:

- Financial Accessibility;
- Inclusive Leadership;
- Agency Disability Resources; and
- Generational Diversity.

Special Emphasis Program

As required by the EEOC, the NCUA's Special Emphasis Program (SEP) is a significant component of the agency's effort to support a model EEO program. SEP events and observances helped build inclusion and understanding while supporting the following goals:

- Workforce diversity: Sustain a skilled, highly engaged, and diverse workforce at all levels, including leadership; and
- Inclusion: Cultivate an inclusive workplace where employees' unique talents, skills, and perspectives are value leveraged.

SEP observances continued to raise awareness and provided employees the opportunity to appreciate diversity. During observances, the NCUA highlighted achievements and addressed barriers, while commemorative activities were both educational and employment related.

- The SEP series identifies speakers who can customize presentations on topics that support outcomes such as employee retention, career development, attracting talent, and deepening cultural intelligence. For each observance, OMWI hosts guest speakers who shared their experiences and offered insights.

The events were supported by the agency's ERGs. ERG members developed observance-related newsletters, highlighted employees through the agency's social media and intranet, and provided presentations and resources that aligned with commemorations.

FY 2023 NCUA SEP Observances

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Observance and Month	Event
National Disability Employment Awareness Month, October 2022 (established by Title 36, U.S. Code, Section 121)	Redefining Neurodiversity in the Workplace
Veterans Day Observance, November 2022 (established by Public Law 380-250)	Code Girls: The Untold Story of the American Women Code Breakers of World War II
National American Indian/Alaska Native Heritage Month, November 2022 (established by Public Law 103-462)	The Untold Story of the Civil War
National Black History Month, February 2023 (established by Public Law 99-244)	Madam C.J. Walker's Gospel of Giving: Black Women's Philanthropy during Jim Crow
National Women's History Month, March 2023 (established by Public Law 100-9)	Founding Mothers: How Women Shaped the American Revolution
Asian American and Pacific Islander Heritage Month, May 2023 (established by Title 36, U.S. Code, Section 102)	The Latehomecomer: A Hmong Family Memoir
Pride Month, June 2023 (established by Proclamation 8387)	Allies at Work: Creating an LGBTQ+ Inclusive Environment
National Hispanic Heritage Month, September 2023 (established by Title 36, U.S. Code, Section 126)	How Latino Americans Shaped the United States and Fought for Acceptance

Barrier Analysis

The NCUA continued its barrier analysis work to identify potential barriers to employment that affect Hispanics and Latinos. Beginning in FY 2023, the barrier analysis included a comprehensive review of the NCUA's workforce data and other relevant data sources, focus group interviews, and an agency wide "NCUA Barrier Analysis Survey." The findings from the barrier analysis will inform the NCUA's policies and practices in the future.

Intern Programs

The NCUA benefits from the diverse perspectives, talent, skills, and experiences interns bring to the agency. Likewise, 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 three distinct intern programs in FY 2023: contract interns, the OPM Pathways Program, and the Mayor Marion S. Barry Summer Youth Employment Program.

Contract Interns

The NCUA has multi-year contracts with intern-sponsoring organizations that serve underrepresented students. Through these contracts, the agency provided intern opportunities to college and university students in undergraduate, graduate, doctoral, and Juris Doctor programs. These interns work at the NCUA for 8–15 weeks.

In FY 2023, the NCUA hosted five interns from Minority Access, Inc. and the Thurgood Marshall College Fund.

OPM Pathways Program

Through OPM's [Pathways program](#), the NCUA provided work assignments and developmental experiences to promote careers

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for individuals who have recently graduated from a qualifying educational institution or program. In FY 2023, the NCUA hosted 12 students throughout the United States who participated in an entirely virtual program.

Mayor Marion S. Barry Summer Youth Employment Program

The [Mayor Marion S. Barry Summer Youth Employment Program](#) gives students from economically disadvantaged backgrounds enrolled in targeted Washington, D.C., public and charter-schools the opportunity to work, explore career paths, and understand federal agencies' missions. In FY 2023, the NCUA hosted four summer high-school interns. The interns were assigned NCUA offices and projects and were welcomed with a comprehensive program plan that included enrichment activities and recurring meetings with senior leaders and agency staff.

Recruitment and Outreach

The NCUA continued exploring new methods to reach prospective applicants identified during recruitment outreach events, build a list of potential employment candidates, and provide useful resources. The NCUA conducted outreach and recruitment efforts in FY 2023 as required by Section 342 of the [Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010](#).

This sustained focus on recruitment resulted in an increase in participation in recruitment events and new outreach partnerships —NCUA employees attended 28 recruitment outreach and partnership events in FY 2023.

Most of these events and partnerships were conducted with minority-serving institutions and organizations and candidates with skillsets in finance, accounting, management, and human resources to ensure a continual source of talented and diverse applicants. Events included:

- PROSPANICA: The Association of Hispanic MBAs & Business Professionals' National Career Expo;
- Hispanic Latino Professionals Association Recruitment Event;
- National Black MBA Association, Inc. National Conference and Career Expo;
- Student Veterans of America National Conference;
- CAREERS & the disABLED Virtual Career Fair;
- Women in Business & Technology Virtual Career Fair;
- Historically Black Colleges and Universities & Minority Serving Institutions Virtual Career Fair;
- Native American and Indigenous Workforce Virtual Career Fair; and
- Gallaudet University's Fall 2023 Internship & Job Fair.

In FY 2023, the NCUA produced two successful, targeted NCUA-only recruitment outreach events for Hispanics and women — a first for the agency. The events drew participants with backgrounds in finance, human resources, accounting, and management.

CULTURA and SWAN, two NCUA ERGs that support Hispanic and female employees, respectively, also engaged with students and potential applicants in a Hispanic-Serving Institution (HSI) Virtual Career Fair and the Accounting & Financial Women's Alliance annual conference recruiting event.

Disability Outreach

The NCUA continued its contract with a vendor that promotes NCUA postings to its third-party clients all over the country with specific filters for Schedule A candidates, among others.

Opt-In Job Opportunities Messaging

Potential career candidates may opt-in to receive email notifications of the NCUA's job opportunities. These periodic emails promote vacancies that are open to the public and to those that qualify to be placed under the Schedule A or Veterans' hiring authorities.

Training

The NCUA offered DEIA-related training opportunities in this past year as described in this section.

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Agency-Wide DEIA Training

The NCUA incorporated standard DEIA training during the agency's 2023 National Training Conference, an event held periodically for all staff. Ninety-eight percent of NCUA employees received this DEIA training, *The Currency of Trust – How to Value, Build, Invest, and Spend It*, on-site at the agency's national training conference.

Two additional DEIA training modules, Workplace Diversity, Equity, and Inclusion in Action and Recognizing and Addressing Micro-behaviors in the Workplace, are also available to employees in the agency's learning and managing performance system.

NCUA managers and employees in leadership programs received interactive and team-building training to enhance both awareness and competence in DEIA principles. Required DEIA-related training for agency managers and new supervisors included:

- EEO and Preventing Discrimination in the Federal Workplace;
- A Roadmap to Success: Hiring, Retaining and Including People with Disabilities;
- Veterans Employment Training;
- Uniformed Services Employment and Reemployment Rights Act (USERRA): A Leadershipw; and
- Interactive training to help leaders build cultural awareness and recognize and mitigate barriers to inclusion.

In addition, the NCUA incorporated updated EEO and DEIA training into the agency's suite of employee development training for new employees, credit union examiners, supervisors, and for reemployed annuitants.

Leadership Development Programs

The NCUA invested in employee development to prepare employees for leadership roles. Common elements of leadership development programs included exposure and access to current management, formal coaching, peer support, and shared learning.

In FY 2023, 5.3 percent (65) of NCUA staff participated in an NCUA leadership development program. 56.9 percent (37) of the participants were women, and 35.4 percent (23) were minorities. Six employees with disclosed disabilities (9.2 percent) also participated in such programs.

FY23 NCUA Leadership Training Programs

Program	Targeted Grade Level	Participant	Women	Men	White	Black/ African American	Asian American Pacific Islander	Hispanic	Native American	Multiracial	Employees with Disabilities
New Leaders	7/9	4	3	1	3	0	0	1	0	0	0
Executive Leadership	11/12	6	5	1	4	1	0	1	0	0	0
Management Development	13/14/15	10	6	4	5	3	1	1	0	0	0
Excellence in Government	14/15	4	0	4	2	0	2	0	0	0	1
NCUA Executive Training	15/Supv	11	3	8	8	2	1	0	0	0	1

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Leadershi Coaching Program	Supervisc (CU12 to SSP)	30	20	10	20	7	0	3	0	0	4
TOTAL		65	37	28	42	13	4	6	0	0	6

Opportunities

The NCUA will continue to enhance its existing programs and activities in 2024:

- Implement activities listed in the NCUA's [2024–2026 DEIA Strategic Plan](#);
- Close out the 2023 cycle for the formal mentorship program and plan for the launch of the 2024 program;
- Conduct a barrier analysis on women and employees with disabilities; and
- Continue recruitment outreach to Hispanic-serving institutions

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

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

Principal EEO Director/Official for

[Redacted]
(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 9/19/2023 and sent to employees on 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
		Yes	No	N/A	
 Measures	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		The business contact information was posted on the agency's website in FY 2023 and posted in agency common areas on May 14, 2024. The Anti-Harassment Program, EEO Program, and Reasonable Accommodation Program mailboxes and phone numbers are included in the EEO annual statement posted in agency common areas and website.
	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			https://ncua.gov/files/publications/careers/reasonable-accommodation-policy-procedures.pdf
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			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			Every 2 years via No FEAR Act Training.

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Agency Self-Assessment Checklist



A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	X			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.			
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			Every 2 years via No FEAR Training, Periodic Anti-Harassment Training.			
 Compliance Indicator	A.3. The agency assesses and ensures EEO principles are part of its culture.			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.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 ERG Above and beyond awards. ERG awards recognize ERG members and officers in four categories (NCUA business strategies, workplace culture, career advancement, and community involvement) in support of EEO and DEIA efforts.			
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	 Measures	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	
	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 28, 2023. The Executive Director and Deputy Executive Director were briefed on September 28, 2023.
	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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 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.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.

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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
		Yes	No	N/A	
 Measures	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			EEO program officials participate in important workforce meetings that might impact EEO issues, such as strategic planning, recruitment strategies, and training. They will continue to participate in these meetings and, as needed, participate in other types of meetings, such as vacancy projections and succession planning.
	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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 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.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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 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.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills				

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		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.6. The agency involves managers in the implementation of its EEO program.				



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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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
		Yes	No	N/A	
 Measures	C.1. The agency conducts regular internal audits of its component and field offices.			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
		Yes	No	N/A	
 Measures	C.2. The agency has established procedures to prevent all forms of EEO discrimination.				
	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)]	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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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			https://ncua.gov/about/diversity-inclusion/workplace-resolutions/pas-fact-sheet
 Compliance Indicator	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	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.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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		Yes	No	N/A	
 Measures	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			OHR and EEO directors met on occasion during FY 2023. Workload and scheduling challenges in 2023 made for some inconsistency in meeting frequency. HR and EEO Directors have scheduled recurring meetings and are carrying them out as planned.
	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			
	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
		Yes	No	N/A	
 Measures	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	N/A. No discipline or sanction actions due to discriminatory conduct have been processed.
 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	C.6. The EEO office advises managers/supervisors on EEO matters.	Yes	No	N/A	
	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 meets monthly with the agency's Chairman and at least twice a month with the Deputy Executive Director; new workforce dashboards were developed to share and review with agency leadership on a quarterly basis.
	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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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
		Yes	No	N/A	
 Measures	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			
 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	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Yes	No	N/A	
	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 is collected through HR office, OMWI, and ERGs.

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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
		Yes	No	N/A	
 Measures	D.3. The agency establishes appropriate action plans to remove identified barriers.			N/A	
	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		The plan activities for barriers identified related to the Principal Examiner exam process are in progress.
	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	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Yes	No	N/A	
	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			https://ncua.gov/files/publications/disability-affirmative-action-plan-2021.pdf
	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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Essential Element: E Efficiency

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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
		Yes	No	N/A	
 Measures	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			
 Compliance Indicator	E.2. The agency has a neutral EEO process.	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.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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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
		Yes	No	N/A	
 Measures	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

 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	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

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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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
		Yes	No	N/A	
 Measures	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.				
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, ERG programs, 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			
 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	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
	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			
 Measures	F.2. The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Yes	No	N/A	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
	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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Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			
 Measures		Yes	No	N/A	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
	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

PART H.1

Brief Description of Program Deficiency:	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)]
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The business contact information was posted on the agency's website in FY 2023 and posted in agency common areas on May 13, 2024. The Anti-Harassment Program, EEO Program, and Reasonable Accommodation Program mailboxes and phone numbers are included in the EEO annual statement posted in agency comment common areas and website.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
06/03/2024	06/28/2024			Post contact information in all common areas for the regional and central offices of the agency.

Responsible Officials

Title	Name	Standards Address the Plan?
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Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
06/28/2024	Develop a poster with the agency's EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director contact information to be posted in common areas, including the breakrooms and office areas. Complete posting across all agency is expected by the target date.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2022	Posted annual EEO statement with mailbox and phone numbers for the Anti-Harassment Program, EEO intake line and mailbox, and Reasonable Accommodations Program in agency common areas and agency website.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/14/2024	05/24/2024			Post contact information in all common areas for the regional and central offices of the agency.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Office of Minority and Women Inclusion	Miguel A. Polanco	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
06/28/2024	Develop a poster with the contact information for the agency's EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director to be posted in common areas, including the breakrooms and office areas.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2022	Posted annual EEO statement with mailbox and phone numbers for the Anti-Harassment Program, EEO intake line and mailbox, and Reasonable Accommodations Program in agency common areas and agency website.

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Plan to Attain Essential Elements

PART H.2

Brief Description of Program Deficiency: 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)]

The planned activities for barriers identified related to the Principal Examiner exam process are in progress.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2022	12/30/2024			Review policies, practices, and procedures that may create a barrier for the employment and career advancement of individuals with disabilities and targeted disabilities. The initial barrier analysis conducted by OPM identified 12 perceived barriers; OHR is implementing a plan to address these and eliminate or mitigate their impact on credit union examiners' career progression.

Responsible Officials

Title	Name	Standards Address the Plan?
OMWI/EEO Director	Miguel A. Polanco	Yes
OHR Director	Towanda Brooks	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2024	NCUA will collaborate with OPM on the format and level of detail provided in future NCUA Promotional Process Adverse Impact Results reports and will ensure OPM includes recommended action items in the reports. The new report format will include disaggregated information broken down by testing type (multiple-choice, job simulation, and structured interview) and include the total number of people by RNO for each category.	Yes		
12/31/2024	Draft and implement the Principal Examiner Development Program Instruction. The development program provides 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 examiner (SME) or specialist.	Yes		

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Plan to Attain Essential Elements

Accomplishments

Fiscal Year	Accomplishment
2020	In an effort 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 roadmap.
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.
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.
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 workshop. 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.
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 adverse impact (ALL ATTEMPTS) for 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 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 to include: 1) Supervisory Examiner Checklist: The purpose is to enhance SE collaboration for CU-11s preparing for the PE Certification Exams. Deployment is dependent upon approval of the PE Program Instruction. 2) PE Development Program Training Report: the purpose is for supervisors and examiners to collaboratively track the 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.

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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 under-representation 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.	
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> 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.	Barrier Name	Description of Policy, Procedure, or Practice
	Low Hispanic Representation	Although no specific barrier has been identified, the NCUA has an under-representation of Hispanics and Latinos.

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
12/01/2022	12/14/2023	Yes	11/14/2024		The agency has contracted with a vendor to conduct a comprehensive barrier analysis as prescribed by the EEOC with a focus on Hispanics. Initial findings are being reviewed by senior leadership.

Responsible Official(s)

Title	Name	Standards Address The Plan?
OHR Director	Towanda Brooks	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
12/31/2023	Complete barrier analysis on Hispanics or Latinos and share findings and recommendations with senior leadership.	Yes	11/14/2024	

Report of Accomplishments

Fiscal Year	Accomplishments
2018	Established CULTURA, a Hispanic/Latino-focused Employee Resource Group (ERG) that strengthens the support, community, and sense of belonging of Hispanic/Latino employees.
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 Office of Human Resources.
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.
2023	The National Recruiter in OHR, in partnership with OMMI, 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 fiscal year 2024.

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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:	<i>Barrier Group</i> 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.	Barrier Name Blocked Pipeline due to PE Exam	Description of Policy, Procedure, or Practice 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			Review policies, practices, and procedures that may create a barrier for the employment and career advancement of individuals with disabilities and targeted disabilities. The initial barrier analysis conducted by OPM identified 12 perceived barriers; OHR is implementing a plan to address these and 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	Towanda Brooks	Yes

National Credit Union Administration

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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
12/31/2023	Draft and implement the Principal Examiner Development Program Instruction. The development program provides 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		

Report of Accomplishments

Fiscal Year	Accomplishments
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.) Principle 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 workshop. 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	In an effort 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 roadmap.
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

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
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.

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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). The current status can be seen in Table A1.	
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> 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.	Barrier Name No barriers have been identified to date	Description of Policy, Procedure, or Practice The agency has plans to investigate women's underrepresentation during FY2024 - FY2025.

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			NCUA completes analysis of underrepresentation of women

Responsible Official(s)

Title	Name	Standards Address The Plan?
OHR Director	Towanda Brooks	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 completes analysis of underrepresentation of women	Yes		
10/01/2025	NCUA begins implementing changes	Yes		

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
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.

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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 with the exception of White Males and Females, All Males, and Black or African American Males. When the FY23 data was reviewed, many FY22 observations were no longer present. The NCUA still has underrepresentation in its executive ranks for both genders in the Asian and Hispanic groups. However, due to the combination of having only a small number of executives and having a small representation of these groups, this underrepresentation is limited to one or two employees in each group. These triggers were identified by reviewing the A-3 data table compared to the CLF and a custom table of race and gender representation of the CU-15 feeder group.	
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> Hispanic or Latino Males Hispanic or Latino Females Asian Males Asian Females	
Barrier Analysis Process Completed?:	Y	
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.	Barrier Name Glass Ceiling in Executive Positions	Description of Policy, Procedure, or Practice While the disparity in representation at senior levels compared to the CLF and Upward Mobility Benchmark indicates possible institutional/structural barriers to advancement, the agency has not identified a specific policy, procedure, or practice 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
01/01/2018	12/14/2023	Yes	11/14/2024		An independent review of data and policies was conducted in FY23 and the vendor recommendations are being reviewed by senior leadership in FY24.

Responsible Official(s)

Title	Name	Standards Address The Plan?
OHR Director	Towanda Brooks	Yes
OMWI/EEO Director	Miguel A. Polanco	Yes

National Credit Union Administration

For period covering October 1, 2022 to September 30, 2023

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	Complete barrier analysis on Hispanics or Latino and share findings and recommendations with senior leadership.	Yes	11/14/2024	
12/14/2024	Review Hispanic/Latino focused barrier analysis for identified barriers and recommended actions that will address Executive hires and promotions.	Yes	12/31/2024	

Report of Accomplishments

Fiscal Year	Accomplishments
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.
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.

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.

OMWI distributes a quarterly workforce dashboard to all NCUA staff, and the dashboards are sent directly to the NCUA leadership under memo and posted on the agency's intranet. The dashboards clearly indicate the PWD/PWTD benchmarks against current NCUA workforce numbers.

Section II: Model Disability Program

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

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

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, edavenport@ncua.gov
Processing reasonable accommodation requests from applicants and employees	1	1	0	Vanessa Jackson, HR Specialist Office of Human Resources vjackson@ncua.gov; JoAnn Cottman, Reasonable Accommodation Specialist, Office of Human Resources (resigned in Dec 2023)
Processing applications from PWD and PWTD	10	0	0	Jodi Johnson, Director Staffing and Classification, Office of Human Resources, jejohnson@ncua.gov; Lisa Bazemore, Lead HR Specialist, Office of Human Resources, mbazemore@ncua.gov; Lauren Portwood, HR Specialist, Office of Human Resources, LPortwood@ncua.gov; Michele Sullivan, HR Specialist, Office of Human Resources, masullivan@ncua.gov
Answering questions from the public about hiring authorities that take disability into account	11	0	0	Jodi Johnson, Director Staffing and Classification, Office of Human Resources, jejohnson@ncua.gov; Lisa Bazemore, Lead HR Specialist, Office of Human Resources, mbazemore@ncua.gov; Lauren Portwood, HR Specialist, Office of Human Resources, LPortwood@NCUA.GOV; Michele Sullivan, HR Specialist, Office of Human Resources, masullivan@ncua.gov
Architectural Barriers Act Compliance	0	0	1	Alejandro HolguinAlejandro Holguin, Facility Management Specialist, aholguin@ncua.gov
Special Emphasis Program for PWD and PWTD	0	0	1	Gladymar Rivera-Virella, EEO Specialist, Office of Minority and Women Inclusion, GVirella@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 attends yearly disability workshops at the Federal Dispute Resolution Conference and/or EEOC’s Examining Conflicts in Employment Laws (EXCEL) training conference. Additionally, human resources staff are provided on-the-job training regarding the sourcing, use, and processing of various hiring appointing authorities and their associated required documentation. New 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

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 a number of activities to enhance outreach to individuals with disabilities. These efforts include: - Maintaining a "talent bank" of Schedule A applicants who apply for agency positions. - Participating in targeted outreach events for people with disabilities. - Expanding the NCUA's outreach through LinkedIn Recruiter and the USAJOBS Resume Mining tool to reach diverse applicants, including those with disabilities. - Offering the Workforce Recruitment Program Services as an additional resource for managers to source potential applicants to fill vacant positions, in addition to the regular competitive recruitment process. - Distributing NCUA vacancy announcements to a newly established email distribution list of potential applicants that have expressed interest in NCUA opportunities during recruitment and outreach events. - Posting a full-page ad in DiversAbility magazine sponsored by DiversityComm. - Leveraging the services of a vendor that distributes NCUA job postings to diverse populations, including PWD and PWTD.

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 diverse pool of applicants, to include targeting and connecting with various disabled veterans' groups and communities in LinkedIn. - Distributing NCUA vacancy announcements to a variety of diverse organizations, colleges, and universities through the digital tool, Handshake. This outreach effort includes veterans' organizations and organizations focused on hiring individuals with disabilities. - Posting all NCUA vacancy announcements on targeted websites to ensure maximum distribution to a diverse audience, which includes individuals with disabilities. - Maintaining a talent bank of Schedule A applicants, which includes disabled veterans who apply for positions with the agency. - Using the USA Jobs 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 diverse 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 Schedule A applicants from assigned colleges and universities. Lastly, the OMWI awarded a contract to expand NCUA postings to state-sponsored organizations, educational entities to widen the candidate pool of employees with disabilities.

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, recently updated supervisory training, and a resource center for employees who are newly appointed into supervisory positions. The resource center provides an overview of training requirements as well as immediate access to external training, webinars, and job aids. A Schedule A job aid tool covers the hiring authority details and answers several commonly asked questions. In addition to the supervisory training and resource center, each HR Specialist is responsible for educating managers 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 boot camp 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 PWDs/PWTDs. Additionally, the agency maintains a contract with CIRCO, which pushes our vacancy opportunities to third-party contacts, including, but not limited to, underserved populations and underrepresented demographics in our workforce, with a specific focus on PWDs and PWTDs nationwide. We attend multiple disability-focused career fairs 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 participates in mock interviews with students at Gallaudet University to assist them in securing employment. The OMWI does advertise a one-page advertisement in DIVERSEability Magazine, one of the nation's most circulated disability magazines. The magazine has a readership of over 267,000 and a circulation of over 250,000. 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 No
- b. New Hires for Permanent Workforce (PWTD) Answer No

Table B8, which displays data for all accessions (100-level nature of action codes), indicates that the NCUA hired 15 PWD out of 133 permanent hires (11.28 percent, which is 1 employee below the 12.00 percent target). It should be noted that the 15 PWDs noted here claimed the disability voluntarily. The actual percentage might exceed the 12 percent EEOC goal.

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 No
- b. New Hires for MCO (PWTD) Answer No

This section discusses permanent new hires into Mission Critical Occupational Series 0580: Credit Union Examiners (Table B7P). PWD: Inspection of the USA Staffing applicant flow data suggests that applicants with disabilities are underrepresented in hires (Table B7P); 135 external PWD out of 2,486 applicants were Qualified (5.43 percent) and only 2 PWD out of 88 applicants were selected (2.27 percent). However, inspection of HR data (not found in tables) suggests that PWD are well represented; 6 PWD out of 73 employees actually onboarded (8.22 Percent). PWTD: Inspection of the USA Staffing applicant flow data suggests that applicants with targeted disabilities are underrepresented in hires (Table B7); 51 PWTD out of 2,486 applicants were Qualified (2.05 percent) and 0 PWTD out of 88 applicants were selected (0.00 percent). However, inspection of HR data (not found in tables) suggests that PWTD are well represented; 2 PWTD out of 73 employees actually onboarded (2.74 Percent).

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 No

b. Qualified Applicants for MCO (PWTD) Answer No

N/A

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 No

b. Promotions for MCO (PWTD) Answer No

N/A

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

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

A. ADVANCEMENT PROGRAM PLAN

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

The NCUA's primary occupation is the Credit Union Examiner (CUE). Entry-level CUE positions are advertised and recruited as 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.

B. CAREER DEVELOPMENT OPPORTUNITES

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 employee leader development (which happens 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: Aspiring Leader Program: offered federal government-wide by the Graduate School's Center for Leadership and Management. NCUA CU 4-6 staff may apply for this two-month program designed to provide competency-based leadership training. Executive Leadership Program: offered federal government-wide by the Graduate School's Center for Leadership and Management. 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. 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. Excellence in Government Fellows: a 12-month program for supervisors/managers. Candidates are able to enhance their skills through a combination of coursework, action-learning projects, executive coaching, and government-wide networking. Fellows remain in their full-time jobs, meet every 6 weeks, and spend a total of 24 days in session. NCUA Executive Training Program: an 18-month program for senior level supervisors. This program prepares employees to transition from supervisory or managerial positions into senior leadership positions within the agency. New Leader Program (NLP) is offered federal government-wide by the Graduate School's Center for Leadership and Management. NCUA CU 7-10 staff may apply for this program designed to develop future leaders. NCUA nominates individuals using our internal competitive selection process; the Graduate School's Center for Leadership and Management has final approval authority. 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. 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: Group coaching was recently piloted at NCUA and was widely successful. As a result, NCUA now 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	30	30	8	8	1	1
Internship Programs	479	12	8	3	0	0
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	18	11	2	1	0	0
Other Career Development Programs	25	11	4	2	2	1
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A

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 Yes
b. Selections (PWD) Answer Yes

For the Internship programs, there was an underrepresentation of PWD in the applications. For the training programs, the representation of PWD decreased from 11.11 percent of the applicants to 9.09 percent of the selections. This difference is approximately one-fifth of an employee.

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 Yes
b. Selections (PWTD) Answer No

For the Pathways interns and the Training programs there were no applicants from PWTD.

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

In the aggregate, there appears to be a trend of employees not reporting a disability. However, many employees have reached the maximum pay for their pay grade and are limited on the percentage of pay increase that they can receive based on their performance. If we exclude the 188 employees that have reached maximum pay limits, there are no statistically significant differences between the remaining 890 non-executive employees: 710 no disabilities (7.37%+/-0.15%), 77 employees who have not disclosed their disability status (6.82% +/- 0.46%), 78 PWD (7.55% +/- 0.53%), or the 25 PWTD (7.06% +/- 0.76%).

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

Data presented Summarizes Table B11 Representation of PWD Internal Merit Promotions at stages of the hiring process SES/SSP: 4/60 (6.67%) Applications; 0/27 (0.00%) Qualified; 0/2 (0.00%) Selected. CU-15: 20/213 (9.39%) Applications; 3/58 (5.17%) Qualified; 0/5 (0.00%) Selected. CU-14: 77/837 (9.20%) Applications; 18/299 (6.02%) Qualified; 0/10 (0.0%) Selected.

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

Representation of PWTD Internal Merit Promotions at stages of the hiring process (Table B11) SES/SSP: 4/60 (6.67%) Applications; 0/27 (0.00%) Qualified; 0/2 (0.00%) Selected. CU-15: 11/213 (5.16%) Applications; 2/58 (3.45%) Qualified; 0/5 (0.00%) Selected. CU-14: 37/837 (4.42%) Applications; 7/299 (2.34%) Qualified; 0/10 (0.00%) Selected. CU-13: 23/535 (4.30%) Applications; 7/129 (5.43%) Qualified; 1/21 (4.76%) Selected.

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 Yes
- b. New Hires to GS-15 (PWD) Answer Yes
- c. New Hires to GS-14 (PWD) Answer Yes
- d. New Hires to GS-13 (PWD) Answer Yes

Representation of PWD New Hires at stages of the hiring process (from Table B15) SES/SSP: 6/106 (5.66%) Qualified; 0/1 (0.00%) Selected. CU-15: 12/241 (4.98%) Qualified; 0/4 (0.00%) Selected. CU-14: 46/1133 (4.06%) Qualified; 0/12 (0.00%) Selected. CU-13: 57/1235 (4.62%) Qualified; 0/7 (0.00%) Selected. It should be noted that each of these triggers is a fraction of a person.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB) Answer Yes
- b. New Hires to GS-15 (PWTB) Answer Yes
- c. New Hires to GS-14 (PWTB) Answer Yes
- d. New Hires to GS-13 (PWTB) Answer Yes

Representation of PWTB New Hires at stages of the hiring process (from Table B15) SES/SSP: 3/106 (2.83%) Qualified; 0/1 (0.00%) Selected. CU-15: 4/241 (1.66%) Qualified; 0/4 (0.00%) Selected. CU-14: 17/1133 (1.50%) Qualified; 0/12 (0.00%) Selected. CU-13: 18/1235 (1.46%) Qualified; 0/7 (0.00%) Selected. It should be noted that each of these triggers is a fraction of a person.

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

Representation of PWD internal competitive promotions for management positions at stages of the hiring process (Table B19) Executives: 4/60 (6.67%) Applications; 0/27 (0.00%) Qualified; 0/2 (0.00%) Selected. Managers: 16/185 (8.65%) Applications; 3/59 (5.08%) Qualified; 0/6 (0.00%) Selected. Supervisors: N/A

6. Does your agency have a trigger involving PWTB 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 (PWTB) Answer Yes
 - ii. Internal Selections (PWTB) Answer No
- b. Managers
 - i. Qualified Internal Applicants (PWTB) Answer Yes
 - ii. Internal Selections (PWTB) Answer Yes
- c. Supervisors
 - i. Qualified Internal Applicants (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer N/A

Representation of PWTD internal competitive promotions for management positions at stages of the hiring process (Table B19) Executives: 4/60 (6.67%) Applications; 0/27 (0.00%) Qualified; 0/2 (0.00%) Selected. Managers: 16/185 (8.65%) Applications; 3/59 (5.08%) Qualified; 0/6 (0.00%) Selected. Supervisors: N/A

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 Yes
- b. New Hires for Managers (PWD) Answer Yes
- c. New Hires for Supervisors (PWD) Answer No

Representation of PWD New Hires Supervisors at stages of the hiring process (Table B18) Executives: 9/200 (4.50%) Applications; 6/106 (5.66%) Qualified; 0/1 (0.00%) Selected. Managers: 32/441 (7.26%) Applications; 22/306 (7.19%) Qualified; 0/4 (0.00%) Selected. Supervisors: N/A It should be noted that each of these triggers is a fraction of a person.

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 Yes
- b. New Hires for Managers (PWTD) Answer Yes
- c. New Hires for Supervisors (PWTD) Answer N/A

Representation of PWTD New Hires Supervisors at stages of the hiring process (Table B18) Executives: 3/106 (2.83%) Qualified; 0/1 (0.00%) Selected. Managers: 9/306 (2.94%) Qualified; 0/4 (0.00%) Selected. Supervisors: N/A It should be noted that each of these triggers is a fraction of a person.

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 No

N/A

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) (Table B16) / prior year's end strength (Table B1)]; calculations only made for the permanent population. No Disability Group = 0.58 percent (0 RIFs + 5 Removals out of 866 employees) PWTD = 2.00 percent (0 RIFs + 1 Removal out of 50 employees). It should be noted that the difference between these groups is a fraction of a person.

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 was a single PWTD that was removed.

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 NCUA Office of the Chief Financial Officer installed ADA door openers in its Central Office building garage and training center to improve physical accessibility. 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. 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 timeframe 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 No

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 N/A

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?

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

Source of the Trigger:	Workforce Data (if so identify the table)					
Specific Workforce Data Table:	Workforce Data Table - B1					
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?	There are triggers for individuals with disabilities and individuals with targeted disabilities in the areas of pathways interns, training, new hires and promotions to senior levels, new hires and promotions to management positions, and voluntary separations.					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities					
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.	Barrier Name Low PWD/PWTD representation	Description of Policy, Procedure, or Practice Although no specific policy, procedure or practice has been identified, barriers appear to be present in pathways interns, training, new hires and promotions to senior levels, new hires and promotions to management positions, and voluntary separations.				
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			NCUA will conduct a barrier analysis on PWD and PWTD.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
OMWI/EEO Director		Miguel A. Polanco		Yes		
OHR Director		Towanda Brooks		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
10/01/2025	NCUA completes analysis of underrepresentation of PWD/PWTD			Yes		
10/01/2025	NCUA begins implementing changes			Yes		
Report of Accomplishments						
Fiscal Year	Accomplishments					
2023	The NCUA begins reviewing data, policy, procedures, and practices. Issued a barrier analysis survey to the workforce, including questions germane to the agency's PWD/PWTD population.					

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.