

National Credit Union Administration

For period covering October 1, 2021 to September 30, 2022

PART A Department or Agency Identifying Information	1. Agency	1. National Credit Union Administration
	1.a 2nd level reporting component	
	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. 1134
	2. Enter total number of temporary employees	2. 29
	3. TOTAL EMPLOYMENT [add lines B 1 through 2]	4. 1163

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
	Anti-Harassment Program Manager	Don Names	Associate Counsel, Anti-Harassment Coordinator
	Anti-Harassment Program Manager	Elizabeth Fischmann	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	Todd Soloweigh	Financial Management Specialist
	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	
Organization Chart	Y	Y	
Agency Strategic Plan	Y	Y	
Anti-Harassment Policy and Procedures	Y	Y	
Personal Assistance Services Procedures	Y	Y	
EEO Policy Statement	Y	Y	
Reasonable Accommodation Procedure	Y	Y	
Alternative Dispute Resolution Procedures	Y	Y	
Diversity Policy Statement	N	Y	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	N	
EEO Strategic Plan	N	N	
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N	
Human Capital Strategic Plan	N	N	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	N	

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.

The agency's [mission](#) is protecting the system of cooperative credit and its member-owners through effective chartering, supervision, regulation, and insurance.

The agency's vision is to 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 a [policy statement](#) to all NCUA employees in September 2022.

Culture, Diversity, and Inclusion Council

The NCUA's Culture, Diversity, and Inclusion (CDI) Council reports to the agency's Talent Management Council. The CDI Council's mission is to build an organizational culture in which our shared values, beliefs, and behavioral norms around equity, diversity, inclusion, engagement, and leadership align with our strategic priorities to optimize organizational performance. The CDI Council works to:

- Identify and advance a positive, high-performing organizational culture that will allow the agency to achieve its mission;
- Support the agency's strategic goal of attracting, engaging, and retaining a highly skilled, diverse workforce and cultivating an inclusive environment; and
- Assist and advise leadership on the implementation of strategic diversity and inclusion priorities.

The CDI Council includes employee representatives at all levels (executives, supervisors, and non-supervisors from multiple grade levels) and a diverse spectrum of functional areas (such as the examination program, legal, human resources, and information technology). The Council's membership includes a diverse cross-section of the agency's staff. A National Treasury Employees Union representative is also a member. CDI Council membership includes up to eight officers of the agency's employee resource groups (ERGs).

In 2022, the CDI Council met several times to develop targeted recommendations for activities to improve employee work experiences. These recommendations were based on employee feedback through the Office of Personnel Management (OPM) Federal Employee Viewpoint Survey (FEVS), Council members, and direct outreach to agency staff. The CDI Council prioritized its work and developed multiple recommendations for senior leadership on the following topics:

- Employee input mechanisms;
- Ethics and conduct;
- Employee safety;
- Training solutions;
- Employee development opportunities;
- Performance management;
- Diversity representation;
- Interagency collaboration; and
- Workload.

Employee Resource Group Network

ERGs are one of the NCUA's strategies to foster an inclusive environment where employees feel valued, respected, and engaged. Studies show ERGs help employees deepen their connection to each other and to the agency's mission. Employees and prospective employees can explore the NCUA's recognized ERGs by visiting [NCUA.gov](#). To foster both allyship and belonging, each ERG is open to all employees.

NCUA Employee Resource Groups

APIC: Asian Pacific Islander Connection (31 members). This group's mission is to promote cultural awareness to foster a sense of community among Asian American and Pacific Islander employees and understanding and appreciation of the Asian American and Pacific Islander culture by all NCUA colleagues. The group seeks to help open more career development and professional opportunities for Asian Americans and Pacific Islanders within the NCUA's ranks and leadership positions.

CULTURA: Creating Unity, Learning to Understand, Recognizing All (72 members). CULTURA is the Hispanic and Latino employee resource group. CULTURA's goals include fostering a diverse and inclusive workforce by developing Latino leadership; bridging the connection between field and support staff; providing professional and career development

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opportunities; building cultural awareness; and supporting retention of Latino employees.

MPower: Employees with Disabilities (27 members). MPower's mission is to recognize and increase awareness and acceptance of employees who have a disability and those who have a family member or other loved ones who have disabilities (temporary or permanent). The group seeks to promote a supportive and accepting environment, provide assistance in achieving and celebrating the full inclusion of all employees, and enhance understanding and awareness of the benefits that diversity brings to build and sustain a strong and thriving workforce.

NCUA PRIDE: People Recognizing Individual Differences Equally (47 members). NCUA PRIDE is the agency's group supporting the LGBTQ+ community. The resource group is committed to providing a safe and supportive environment for members, providing LGBTQ+-relevant informational resources, supporting members' career development, serving as an advocate to help the NCUA become more LGBTQ+-inclusive, and supporting outreach efforts both within and outside the agency.

NEON: New Employees of NCUA (58 members). NEON is the agency's group supporting new employees and allies. The group's mission is to collaborate, provide resources, and support new employees by sharing experiences, and assisting in career development.

SWAN: Supporting Women At NCUA (101 members). SWAN's purpose is to support and expand networking, educational, and outreach programs that emphasize the personal and professional development of women through expanded cultural awareness, educational events, and mentoring.

Umoja: Unity (87 members). Recognizing a common African ancestry embraces the principle of Umoja or unity through connectivity and community by intentionally including all employees desiring to increase awareness and respect for differences, pursue opportunities for innovation and change, and align with others to build and sustain a thriving workforce.

VANS: Veterans At NCUA Serving (58 members). This ERG is for employees who have served in the military or those who support the nation's veterans. The group's mission is to leverage military experiences, share creative solutions, develop camaraderie, and enhance the mission of the NCUA among all employees, with special emphasis on the military and veteran culture.

New Employee Resource Group

On July 11, 2022, the NCUA announced the approval of the NEON (New Employees Of NCUA) ERG, a new ERG. NEON's mission is "to provide resources and support to new employees, share experiences, assist in career development, and enhance the mission of the NCUA among all employees, with a special emphasis on new NCUA employees."

Program Support

Continued NCUA support for the program helped ERGs thrive and grow. This support included:

- Consulting during new ERG formation and planning;
- Connecting individual groups and subject matter experts for special projects;
- Ongoing maintenance of ERG intranet sites to make program promotion and documentation consistent and accessible across groups;
- Assisting in logistics and funding for kickoff events and ongoing efforts;
- Assisting in developing Diversity and Inclusion Partnership plans;
- Expanding ERG program visibility through postings detailing ERG members' experiences on the NCUA's social media platforms;
- Promoting the program on other available platforms such as SharePoint, newsletters, meetings, and NCUA-wide events;
- Engaging in quarterly check-ins with ERGs to identify challenges and areas of opportunity; and
- Providing quarterly updates and regular meetings with executive sponsors and officers to discuss activities, requests, and additional support.

Disability Solutions Desk

The NCUA initiated a Disability Solutions Desk pilot in 2022, which established a central point of access through a centralized

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email account to address inquiries related to disabilities. Employees may send questions, express concerns and challenges, and offer recommendations related to disabilities. Dedicated OMWI staff review all incoming messages and coordinate a response and support with appropriate program offices. Following a 120-day pilot, the Disability Solutions Desk was instituted permanently to ensure support for agency staff.

OMWI Talks

During this reporting period, the NCUA has continued to host informal, facilitated, and open discussions about diversity-related topics. These conversations offer employees a safe space to discuss differences, broaden their awareness and understanding of others, and learn how to manage the challenges diversity can create in the workplace.

In 2022, the NCUA continued supporting the OMWI Talks series with recurring conversations on the following topics:

- Danger of a Single Story;
- Microaggressions;
- Belonging; and
- Creating Culture.

Each webcasted event attracted more than 200 participants and was facilitated by OMWI. The NCUA will continue to host OMWI Talks in 2023.

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 and supported the following goals in the NCUA's [2018–2022 Diversity and Inclusion Strategic Plan](#):

- Workforce diversity: Sustain a skilled, highly engaged, and diverse workforce at all levels, including leadership (Goal 1); and
- Inclusion: Cultivate an inclusive workplace where employees' unique talents, skills, and perspectives are valued and leveraged (Goal 2).

Eight SEP observances in 2022 raised awareness and provided employees the opportunity to appreciate diversity. During the annual observances, OMWI highlighted achievements and addressed barriers to the full employment and inclusion of all NCUA employees. Commemorative activities conducted for these observances were educational and employment related. For each observance, OMWI hosted guest speakers who shared their experiences and offered insights on how to be more intentionally inclusive in the workplace. Topics in 2022 included:

- Historical events and lessons learned;
- DEI efforts;
- Career development, retention, and recruitment efforts; and
- Cultural educational resources.

These events were also supported by the agency's ERGs. ERG members developed observance-related newsletters, highlighted employees on social media and the agency's intranet, and provided educational presentations and resources in alignment with each commemoration.

As part of its SEP, OMWI awarded a contract in 2022 to begin a barrier analysis to identify barriers to employment impacting Latinos or Hispanics and women.

Diversity and Inclusion Award

On November 30, 2022, the agency granted its fifth Diversity and Inclusion "Of the Year" award to recognize an NCUA employee who exhibited achievement in diversity and inclusion during the agency's Chairman's Outstanding Achievement Awards. The honoree led diversity and inclusion efforts as the Acting Director of OMWI. In this role, the honoree demonstrated true commitment and dedication to the principles and practices that support diversity, equity, and inclusion within the NCUA. The honoree's leadership style embodies the commitment to inclusion and belonging and demonstrates it through actively participating on the CDI Council and with the agency's ERGs.

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FEVS Results on Key Indicies**Employee Engagement**

In 2022, 83.1 percent of NCUA employees participated in the OPM FEVS, an increase of 2.4 percentage points from 80.7 percent in 2021. This response rate was the highest of any medium-sized government agency. In comparison, the response rate government-wide was 35.3 percent, and the response rate for medium-sized agencies (the NCUA agency categorization) was 60.0 percent in 2022.

The OPM FEVS Employee Engagement Index (EEI) measures conditions that are conducive to employee engagement. The EEI is comprised of three subindices: Leaders Lead, Supervisors, and Intrinsic Work Experience. Leaders Lead reflects employees' perceptions of the integrity of leadership, as well as leadership behaviors, such as communication and workforce motivation. Supervisors reflects the interpersonal relationship between worker and supervisor, including trust, respect, and support. Intrinsic Work Experience reflects employees' feelings of motivation and competency relating to their work roles. The NCUA's 2022 EEI was 76.0 percent, a 1 percentage point decrease from 2021. In comparison, the EEI score government-wide is 70.5 percent, and it is 76.0 percent for medium-sized agencies.

Diversity, Equity, Inclusion, and Accessibility (DEIA) Index

OPM developed a new DEIA index for the 2022 FEVS. The index reveals that 76.5 percent of NCUA respondents report positive perceptions of agency practices related to DEIA. In comparison, the government-wide DEIA index average was 69.3 percent and 75.0 percent for medium-sized agencies in 2022. This measure was specifically designed to align with [Executive Order 14035](#), which features four distinct factors of DEIA included as FEVS subindices.

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 2022 was 89.5 percent, a decrease from 90.1 percent in 2021. In comparison, the government-wide index's average was 83.5 percent, and 89.0 percent for medium-sized agencies for 2022.

Global Satisfaction Index

The FEVS Global Satisfaction Index is a combination of employees' satisfaction with their job, pay, and organization, plus their willingness to recommend their organization as a good place to work. The NCUA's Global Satisfaction Index for 2022 was 65.3 percent, down from 73.0 percent in 2021. This compares to 61.7 percent government-wide and 69.0 percent for medium-sized agencies in 2022.

Engagement Action Plans

The NCUA began developing employee engagement action plans in 2018 to strengthen its workforce; grow and develop employees' leadership competencies; and ensure the agency can attract, develop, manage, and retain the best workforce possible to meet its needs. The plan established several overall agency goals, and each NCUA office annually develops a specific Workforce Engagement Action Plan using the FEVS results. The NCUA continues its agency-wide employee engagement planning efforts.

Mentorship Program

OMWI established the agency's first formal mentorship program in 2016, which continues to evolve. The agency is committed to employee career development and understands that mentorship is a diversity and inclusion industry best practice. OMWI uses participant feedback to grow and advance the mentor program continually. The program allows NCUA employees to find their niche in the organization, build strategic relationships, and gain a broader perspective of NCUA's mission and future. On a larger scale, program mentors can establish their legacy by helping build the next generation of leaders at the agency. The NCUA's 2021 mentorship program concluded in June 2022. Twenty-six partnerships participated in the program engaging in training and developmental activities.

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Program improvements introduced in 2022 include adding an interactive mentee café and situational mentors. The mentee café was a facilitated gathering of mentees approximately 3 months into the program, allowing for a safe space to discuss best practices, network, and offer recommendations to improve the program. Also in 2022, OMWI recruited situational mentors to serve as a reserve bank for program participants who requested support with a program or skill their assigned mentor did not possess.

The program concluded with a recognition event hosted by the NCUA Chairman. The event acknowledged the program's accomplishments, reflected on lessons learned, and shared touching testimonials. Highlights from the program evaluation included:

- 95 percent of participants advised the program was effective at facilitating individual growth and professional development, and that they have gained a better understanding of the organizational values, mission, and unwritten rules; and
- 97 percent of participants would recommend the program to a friend or colleague.

Recruitment and Outreach

Most of the agency's outreach and recruitment efforts target groups with less-than-expected participation in the workforce as required by Section 342 of the [Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010](#).

In 2022, the NCUA continued building on the previous year's recruitment outreach success. OMWI worked closely with OHR to identify and participate in recruitment outreach events. In partnership, OMWI and OHR targeted diverse candidates with skillsets in finance, accounting, management, and human resources to ensure a continual increase in talented and diverse applicants.

Recruitment Outreach Working Group

OMWI established a Recruitment Outreach Working Group (ROWG) in late 2020 to streamline the NCUA's recruitment outreach to increase the number of talented and diverse candidates in the agency's applicant pool. The ROWG includes representatives from:

- OMWI;
- OHR;
- Office of External Affairs and Communications;
- NCUA regional offices; and
- ERG presidents.

In 2022, the ROWG focused on maximizing the agency's resources to attract talented and diverse applicants. The group was instrumental in establishing new partnerships — the group created and published a 12-month, full-page ad in Florida A&M's campus Rattler monthly newsletter and attended the following events:

- The University of Miami STEM Virtual Career Fair;
- Florida International University Spring 2022 Virtual Career Fair – Business Majors;
- American University Spring 2022 Virtual Job & Internship Fair;
- Accounting & Financial Women's Alliance annual event; and
- Hispanic Serving Institutions Virtual Summit + Fair (a collaborative of 14 top Hispanic Serving Institutions).

Recruitment Outreach

In 2022, the NCUA continued to work with a leading diversity outreach vendor to expand the diverse, qualified candidate pool that targets candidates with disabilities, underrepresented groups, women, and veterans. The following outreach and recruitment activities took place:

- Outreach using social media platforms and digital recruitment tools;
- Job fairs and virtual career fairs focused on diverse candidates;
- Contact and engagement with universities, with a focus on Historically Black Colleges and Universities, Hispanic Serving Institutions, Asian American Native American Pacific Islander Serving Institutions, Tribal Colleges and Universities;
- Contact with professional organizations; and
- Contact with subject matter experts external to the NCUA for access to their networks.

The agency conducted outreach to Hispanic Serving Institutions, colleges, and universities with a high percentage of Hispanic

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

members or students, and Hispanic-focused organizations. The agency also participated in recruitment events with organizations that support individuals with disabilities. Virtual events included CareerEco's CAREERS and the disABLED Virtual Career Fair.

Opt-In Messaging

Potential career candidates in 2022 could opt-in to receive email notifications of job opportunities. These periodic emails promote NCUA vacancies that are open to the public. This activity helped increase the number of talented and diverse candidates in the agency's applicant pool.

Training

Agency-Wide Training

OMWI launched two DEI training modules: Workplace Diversity, Equity, and Inclusion in Action and Recognizing and Addressing Micro-behaviors in the Workplace, both of which were available to staff in the agency's learning management system.

2022 DEI Training

Required agency-wide DEI-related training for agency managers included:

- Veteran's Employment Training (information and tools to become more familiar with employment of veterans and its benefits);
- Uniformed Services Employment and Reemployment Rights Act (USERRA): An Overview; and
- Interactive DEI Training (to help leaders build cultural awareness and recognize and mitigate barriers to inclusion).

Intern Programs

The NCUA benefits from the diverse perspectives, talent, skills, and experience 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 2022.

Contract Interns

The NCUA has multi-year contracts with six intern-sponsoring organizations that serve underrepresented students. Through these contracts, the agency provides summer intern opportunities to college and university students in undergraduate, graduate, doctoral, and Juris Doctorate programs. These interns work at the NCUA for 8 to 15 weeks. In 2022, OMWI hosted five summer interns from Hispanic Association of Colleges and Universities, Minority Access, and INROADS.

OPM Pathways Program

Through this program, the NCUA OHR provides work assignments and developmental experiences to promote careers for individuals who have recently graduated from a qualifying educational institution or program. In 2022, the NCUA hosted 15 students — its largest cohort to date — through OPM's [Pathways Program](#), attracting summer interns from various backgrounds. Interns located throughout the United States participated in an entirely virtual program. Pathways interns develop skills through challenging work assignments and by developing Individual Development Plans. They are supported by mentors and receive formal interactive training.

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 2022, OMWI partnered with the Office of the Comptroller of the Currency (OCC)

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to host five summer high-school interns. OCC coordinates intern participation for multiple federal agencies, including the NCUA. (Under OCC, the program is branded as the High School Scholars Intern Program, or HSSIP.) The program was championed by the NCUA's Office of the Executive Director, and interns were welcomed with a comprehensive program plan that included enrichment activities and recurring meetings with senior leaders and agency staff.

Barrier Analysis

OMWI awarded a contract to complete work on a targeted barrier analysis in 2023 to identify challenges in hiring and retaining women and Hispanic or Latino employees. A kick-off meeting with vendors was held on December 13, 2022. The findings from the comprehensive barrier analysis will inform OMWI and agency DEI programs in the coming years, making this a primary opportunity for the NCUA.

Culture, Diversity, and Inclusion Council

The NCUA continues to work with the CDI Council to build an organizational culture in which our shared values, beliefs, and behavioral norms around DEI, engagement, and leadership align with our strategic priorities to optimize organizational performance. OMWI is developing an orientation for new council members and will provide engaging, relevant training to council members to support their activities.

Employee Resource Groups

In addition to ongoing ERG programs and education, initiatives planned for 2023 include:

Request Process

OMWI continues to develop processes to guide more efficient and effective interactions with ERGs. These include requests, approvals, and alignment of mutual expectations. Planned improvements include extending ERG Diversity, Inclusion, and Partnership plans, increasing the effectiveness of administrative documents and resources for ERG officers, and expanding the pool of resources available to ERGs.

Annual Training

OMWI will host voluntary leadership training to ensure newly elected ERG officers have the resources and knowledge necessary to carry out their duties.

New Officers Onboarding Package

OMWI will provide a package of resources and educational materials to assist officers in transitioning into their new roles. The package will include worksheets, frequently asked questions, templates, and other resources.

External Outreach

OMWI will continue exploring new methods to reach prospective applicants identified during recruitment outreach events, building a list of potential employment candidates, and providing valuable resources.

Information Sessions

In 2023, the addition of agency-hosted information sessions will be included in outreach and recruitment. The information session will consist of a diverse panel of subject matter experts focused on a specific specialty skill or job category, agency leadership, and OHR representatives who will provide information on the application process and answer questions.

Hispanic Outreach

Outreach planned for 2023 includes contact with professional organizations such as the Hispanic/Latino Professional Association and other Hispanic professional organizations and Hispanic Serving Institutions, colleges, and universities with higher percentages of Hispanics and Hispanic student organizations. The agency will host a virtual information session, and

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

panelists will be Hispanic and include members of the CULTURA ERG.

Disability Outreach

In 2023, the agency will conduct outreach and recruitment events focused on helping individuals with disabilities. The agency will contact professional and educational organizations focusing on advancing individuals with disabilities. For example, the Student Veterans of America's disability services liaison and the American Accounting Association launched a certificate course for individuals with disabilities.

Coordinated Effort

In June 2022, OHR hired a national recruiter to develop a national recruitment strategy with engagement and relationship-building themes. Activities such as partnering with hiring managers to establish candidate search parameters, conducting broad and targeted recruitment and outreach, engaging and developing relationships with colleges and universities, and reviewing and reworking the agency's branding will be focus areas supporting the national strategy. OMWI will also coordinate with the SEP program manager and ERG officers to enlist support for external outreach opportunities and deliver consistent messaging.

Internal Outreach

Training

In 2023, the NCUA will incorporate standard DEIA training into the agency's National Training Conference, which is mandatory for all employees. This training will be delivered in collaboration with OHR. OMWI will also partner with the NCUA's leadership development programs to identify new curriculum, as appropriate. In addition, OMWI plans to coordinate disability hiring, retention, and career development training for all hiring managers.

During 2023, NCUA managers will receive interactive and team-building training on DEI to enhance both awareness and competence in these principles.

Special Emphasis Program

The OMWI SEP is currently engaged in White House initiatives to expand the agency's visibility in advancing, retaining, and attracting experienced and new talent. The [White House Initiative on Advancing Educational Equity, Excellence and Economic Opportunity for Hispanics](#) as well as the [White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity for Black Americans](#) serve as a space for sharing efforts, best practices, accomplishments, opportunities, and efforts to remove barriers to employment.

OMWI Talks

OMWI will continue to leverage the OMWI Talks platform to engage employees in conversations on topics related to DEI in the workplace. Events in 2023 will feature informal discussions and interviews with NCUA leaders on a topic of their choice related to DEI.

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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			9/28/2022
	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			

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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			
	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 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 Training
	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 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.

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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	A.3. The agency assesses and ensures EEO principles are part of its culture.				
	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
	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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Essential Element: B Integration of EEO into the agency's Strategic Mission

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.1. The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.				
	B.1.a. Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	X			The OMWI Director reports to the NCUA Chairman.
	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 Chairman's Chief of Staff were briefed on September 29, 2022. The Executive Director and Deputy Executive Director were briefed on September 27, 2022.
	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

 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

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

3.1 Attract, develop, and retain an engaged, high-performing, diverse workforce within an inclusive, professional environment.

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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
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			Anti-Harassment Coordinator resides in NCUA Office of Ethics Counsel, which reports directly to the NCUA Board and is supervised by the Chairman.
	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			Instruction 1235.08 (REV 2) "NCUA Anti-Harassment Process."
	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			NCUA Instruction No. 1235.08 (REV 2), Section 5G, provides that the EEO Office (OMWI) will provide advice on EEO matters and inform OEC of all EEO counseling activity where harassment is alleged.

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<p>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.</p>	<p>X</p>			<p>NCUA Instruction No. 1235.08 (REV 2), Section 6A, specifically requires: Within ten (10) calendar days of receipt of notification of a report of harassment, OEC will conduct an initial inquiry and, when appropriate, attempt to informally resolve the matter.</p>
<p>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)]</p>	<p>X</p>			
<p>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)]</p>	<p>X</p>			
<p>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)]</p>	<p>X</p>			
<p>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)]</p>	<p>X</p>			
<p>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)]</p>	<p>X</p>			
<p>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)]</p>	<p>X</p>			
<p>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.</p>	<p>X</p>			
<p>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)]</p>	<p>X</p>			
<p>C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.</p>	<p>X</p>			<p>https://ncua.gov/about/diversity-inclusion/workplace-resolutions/pas-fact-sheet</p>

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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.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.				
	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			
	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			

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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.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.				
	C.4.a. Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	X			
	C.4.b. Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	X			
	C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	X			
	C.4.d. Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	X			
	C.4.e. Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:				
	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	X			
	C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	X			
	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			
 Compliance Indicator	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	C.5.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			
	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			

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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.6. The EEO office advises managers/supervisors on EEO matters.				
	C.6.a. Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.	X			EEO director 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			

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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.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)				
	D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	X			
	D.2.b. Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	X			
	D.2.c. Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	X			
	D.2.d. Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.	X			The agency reviews, employee climate surveys, employee resource group feedback, and special emphasis program feedback. The agency also reviews exit survey data quarterly and presents the information to the Talent Management Council.
 Compliance Indicator	D.3. The agency establishes appropriate action plans to remove identified barriers.	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	D.3.a. Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	X			
	D.3.b. If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	X			
	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	X			

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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.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.				
	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.	X			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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Agency Self-Assessment Checklist

Essential Element: E Efficiency

National Credit Union Administration

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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.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 within the Office of General Counsel who does not represent the agency in personnel cases conducts this review.
E.2.c. If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]		X			Another attorney within the Office of General Counsel who does not represent the agency in personnel cases conducts this review.
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
 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			Quarterly 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 has established employee resource groups, noted to be a best practice in workplace inclusion, to increase employee engagement and workplace inclusion. The agency also holds monthly diversity discussions, also known to be a best practice. Agency EEO director meets regularly with counterparts from other agencies and discusses best practices.
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			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	F.3. The agency reports to EEOC its program efforts and accomplishments.				
	F.3.a. Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	X			
	F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	X			

Essential Element: O Other

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Plan to Attain Essential Elements

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Plan to Eliminate Identified Barriers

PART I.1

Source of the Trigger:	Workforce Data (if so identify the table)					
Specific Workforce Data Table:	Workforce Data Table - A3					
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	For FY2022, the NCUA observed underrepresentation in its executive ranks for all race, national origin (RNO) and gender groups with the exception of White Males and Females, All Males and Black or African American Males. Condition was recognized as a potential trigger by reviewing the data tables referenced above.					
STATEMENT OF BARRIER GROUPS:	<p><i>Barrier Group</i></p> <p>All Women Hispanic or Latino Males Hispanic or Latino Females Black or African American Males Black or African American Females Asian Males Asian Females Native Hawaiian or Other Pacific Islander Males Native Hawaiian or Other Pacific Islander Females American Indian or Alaska Native Males American Indian or Alaska Native Females Two or More Races Males Two or more Races Females</p>					
Barrier Analysis Process Completed?:	N					
Barrier(s) Identified?:	N					
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table border="1"> <thead> <tr> <th>Barrier Name</th> <th>Description of Policy, Procedure, or Practice</th> </tr> </thead> <tbody> <tr> <td>N/A</td> <td>Outreach efforts continue to be focused on underrepresented populations. The agency is contracting a vendor to conduct a comprehensive barrier analysis as prescribed by the EEOC, with an initial focus on Hispanics and Women. There is an on-going review of the perceived barriers in the Principal Examiner Exam process since this is a critical step for the mission critical workforce (~2/3 of NCUA total) retention and advancement to management and executive ranks.</td> </tr> </tbody> </table>	Barrier Name	Description of Policy, Procedure, or Practice	N/A	Outreach efforts continue to be focused on underrepresented populations. The agency is contracting a vendor to conduct a comprehensive barrier analysis as prescribed by the EEOC, with an initial focus on Hispanics and Women. There is an on-going review of the perceived barriers in the Principal Examiner Exam process since this is a critical step for the mission critical workforce (~2/3 of NCUA total) retention and advancement to management and executive ranks.	
Barrier Name	Description of Policy, Procedure, or Practice					
N/A	Outreach efforts continue to be focused on underrepresented populations. The agency is contracting a vendor to conduct a comprehensive barrier analysis as prescribed by the EEOC, with an initial focus on Hispanics and Women. There is an on-going review of the perceived barriers in the Principal Examiner Exam process since this is a critical step for the mission critical workforce (~2/3 of NCUA total) retention and advancement to management and executive ranks.					

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Plan to Eliminate Identified Barriers

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
01/01/2018	12/30/2023	Yes			Review policies, practices, and procedures that may be creating 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 and the NCUA Office of Human Resources is implementing its plan of action to address these barriers and eliminate or mitigate their impact on credit union examiners' career progression.

Responsible Official(s)

Title	Name	Standards Address The Plan?
OHR Director	Towanda Brooks	Yes
OMWI Director	Miguel Polanco	Yes

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2023	Quarterly CDI Council meetings that will periodically include ERG members and regional and office representation.	Yes		
12/31/2023	Review of Principal Examiner process to identify obstacles within the process that interfere with minority groups passing the exam and advancing to management and executive ranks. This is an issue of pipeline and overall retention since many may leave after not passing the exam.	Yes		
12/31/2023	Monthly OHR and OMWI meetings to collaborate on accomplishing goals set forth in the diversity and inclusion strategic plan.	Yes		
12/31/2023	Applicant Flow Data (AFD) is being shared with regional directors to a greater extent, and with NCUA leadership. Regions are increasing their outreach and using new outreach methods to attract a larger number of diverse applicants.	Yes		
12/31/2023	Enhanced outreach initiatives spearheaded by the National Recruiter in OHR in partnership with OWMI to amplify diverse applicant pools for NCUA vacancies. These involve an array of strategies, such as forging stronger alliances with colleges and universities, diversity networks, and bolstering the visibility of recruitment tools available to managers and recruitment teams.	Yes		

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
2022	<p>The agency enhanced its data capabilities in 2020 and 2021 by creating and enhancing its human capital dashboard. The regions and offices have access to this Dashboard and data relevant to their organizations. This allows a transparent picture of the workforce and the opportunity for better, data-driven decision making.</p> <p>OHR established a working group to build out resources like a Principal Examiner (PE) Toolkit to assist examiners in preparing for the PE Examination. Further, feedback to testers has been enhanced to aid in the understanding of test results and opportunities to improve for future testing. OHR continues to enhance this program to include administering the exam in a virtual environment and ensuring reasonable accommodation requests are provided expeditiously and meet the needs of the employees.</p>

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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 - 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?	Within tables A1, A3, and A6P For FY2022, the NCUA observed underrepresentation in Hispanic or Latino Males and Females, White Females and All Females across all NCUA staff and within the credit union examiner and supervisor ranks. Condition was recognized as a potential trigger by reviewing the data tables referenced above.	
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> All Women Hispanic or Latino Males 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 N/A	Description of Policy, Procedure, or Practice Outreach efforts continue to be focused on underrepresented populations. The agency is contracting a vendor to conduct a comprehensive barrier analysis as prescribed by the EEOC with an initial focus on Hispanics and Women. There is an on-going review of the perceived barriers in the Principal Examiner Exam process since this is a critical step for the mission critical workforce (~2/3 of NCUA total) retention and advancement to management ranks.

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 be creating 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 and the NCUA Office of Human Resources is implementing its plan of action to address these barriers and eliminate or mitigate their impact on credit union examiners' career progression.

Responsible Official(s)

Title	Name	Standards Address The Plan?
OMWI Director	Miguel 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	Monthly OHR and OMWI meetings to collaborate on accomplishing goals set forth in the diversity and inclusion strategic plan.	Yes		
12/31/2023	Quarterly CDI Council meetings that include ERG members and regional and office representation.	Yes		
12/31/2023	Expanded outreach efforts between OMWI/OHR to use new outreach tools to reach a larger diverse applicant pool.	Yes		
12/31/2023	Applicant Flow Data (AFD) is being shared with regional directors to a greater extent, and with NCUA leadership. Regions are increasing their outreach and using new outreach methods to attract a larger number of diverse applicants.	Yes		
12/31/2023	Complete barrier analysis on Hispanics and share findings and recommendations with senior leadership. (Barrier analysis for Women across the agency to be completed by 12/31/2024)	Yes		
12/31/2023	Review of Principal Examiner process to identify obstacles within the process that interfere with minority groups passing the exam. This is an issue of pipeline and overall retention since many may leave after not passing the exam.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2022	<p>The agency enhanced its data capabilities in 2020 and 2021 by creating and enhancing its human capital dashboard. The regions and offices have access to this dashboard and data relevant to their organizations. This allows a transparent picture of the workforce and the opportunity for better, data-driven decision making.</p> <p>The NCUA completed its award of the barrier analysis contract in December 2022 to identify barriers to Hispanic representation and retention at the agency. The contract will cover women underrepresentation during the 2024 option year.</p> <p>OHR established a working group to build out resources like a PE Toolkit to assist examiners in preparing for the PE Examination. Further, feedback to testers has been enhanced to aid in the understanding of test results and opportunities to improve for future testing. OHR continues to enhance this program to include administering the exam in a virtual environment and ensuring reasonable accommodation requests are provided expeditiously and meet the needs of the employees.</p>

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Plan to Eliminate Identified Barriers

PART L3

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?	For FY2022, the NCUA observed underrepresentation in the Supervisor ranks across Asian Females, Native Hawaiian, or Other Pacific Islanders (Males and Females), American Indian or Alaska Native Females, and Two or More Races (Males and Females). Condition was recognized as a potential trigger by reviewing the data tables referenced above.	
STATEMENT OF BARRIER GROUPS:	<p><i>Barrier Group</i></p> <p>Asian Females Native Hawaiian or Other Pacific Islander Males Native Hawaiian or Other Pacific Islander Females American Indian or Alaska Native Males American Indian or Alaska Native Females Two or More Races Males Two or more Races Females</p>	
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
	No barriers have been identified to date	Outreach efforts continue to be focused on underrepresented populations. The agency is contracting a vendor to conduct a comprehensive barrier analysis as prescribed by the EEOC with an initial focus on Hispanics and Women. Subsequent barrier analysis may address identified trigger in these barrier groups. There is an on-going review of the perceived barriers in the Principal Examiner Exam process since this is a critical step for the mission critical workforce (~2/3 of NCUA total) retention and advancement to management ranks.

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
09/30/2022	12/31/2025	Yes			Review policies, practices, and procedures that may be creating 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 and the NCUA Office of Human Resources is implementing its plan of action to address these barriers and eliminate or mitigate their impact on credit union examiners' career progression.

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Plan to Eliminate Identified Barriers

Responsible Official(s)

Title	Name	Standards Address The Plan?
OMWI Director	Miguel Polanco	Yes
OHR Director	Towanda Brooks	Yes

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2023	Monthly OHR and OMWI meetings to collaborate on accomplishing goals set forth in the diversity and inclusion strategic plan.	Yes		
12/31/2023	Quarterly CDI Council meetings that will periodically include ERG members and regional and office representation.	Yes		
12/31/2023	Expanded outreach efforts between OMWI/OHR to use new outreach tools to reach a larger diverse applicant pool.	Yes		
12/31/2023	Applicant Flow Data (AFD) is being shared with regional directors to a greater extent, and with NCUA leadership. Regions are increasing their outreach and using new outreach methods to attract a larger number of diverse applicants.	Yes		
12/31/2023	Review of Principal Examiner process to identify obstacles within the process that interfere with minority groups passing the exam. This is an issue of pipeline and overall retention since many may leave after not passing the exam.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2022	<p>The agency enhanced its data capabilities in 2020 and 2021 by creating and enhancing its human capital dashboard. The regions and offices have access to this dashboard and data relevant to their organizations. This allows a transparent picture of the workforce and the opportunity for better, data-driven decision making.</p> <p>OHR established a working group to build out resources like a PE Toolkit to assist examiners in preparing for the PE Examination. Further, feedback to testers has been enhanced to aid in the understanding of test results and opportunities to improve for future testing. OHR continues to enhance this program to include administering the exam in a virtual environment and ensuring reasonable accommodation requests are provided expeditiously and meet the needs of the employees.</p>

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 in the agency's intranet. The dashboards clearly indicate the PWD/PWTD benchmarks against current NCUA workforce numbers.

Section II: Model Disability Program

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

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

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

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	
Answering questions from the public about hiring authorities that take disability into account	9	0	0	Jodi Johnson, Director Staffing and Classification, Office of Human Resources; Lisa Bazemore, Lead HR Specialist, Office of Human Resources; Homayra Jami, Lead HR Specialist, Office of Human Resources; Lauren Portwood, HR Specialist, Office of Human Resources; Chelsey Preer, HR Specialist, Office of Human Resources Michele Sullivan, HR Specialist, Office of Human Resources
Processing reasonable accommodation requests from applicants and employees	1	1	0	Vanessa Jackson, HR Specialist Office of Human Resources; JoAnn Cottman, Reasonable Accommodation Specialist, Office of Human Resources
Processing applications from PWD and PWTB	9	0	0	Jodi Johnson, Director Staffing and Classification, Office of Human Resources; Lisa Bazemore, Lead HR Specialist, Office of Human Resources; Homayra Jami, Lead HR Specialist, Office of Human Resources; Lauren Portwood, HR Specialist, Office of Human Resources; Chelsey Preer, HR Specialist, Office of Human Resources Michele Sullivan, HR Specialist, Office of Human Resources
Section 508 Compliance	0	0	1	Nickol Davenport, Website Admin/ Section 508 Coordinator edavenport@ncua.gov
Architectural Barriers Act Compliance	0	0	1	Alejandro Holguin aholguin@ncua.gov
Special Emphasis Program for PWD and PWTB	0	0	1	Gladymar Rivera-Virella 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 and OHR staff attend yearly disability workshops at the Federal Dispute Resolution Conference and/or EEOC’s Examining Conflicts in Employment Laws (EXCEL) training conference. Additionally, human resources staff are provided on the job training regarding the sourcing, use, and processing of various hiring appointing authorities, and their associated required documentation. New specialists are trained by senior specialists on the agency disability program and responsibilities.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

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 PWTB

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 USAJobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a disability rating of 30% or more. - Distributing NCUA vacancy announcements to an email distribution list of potential applicants that have expressed interest in NCUA opportunities during recruitment and outreach events. - Leveraging social media channels established by the NCUA's Office of External Affairs and Communications to announce the NCUA's participation at diverse recruitment outreach events.

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

The Disability Recruitment Program Manager 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 every recruitment during the strategic conversation step. 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. The Schedule A job aid tool covers the hiring authority details and answer 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

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 shares vacancy announcements with diverse organizations, and colleges and universities, to establish working partnerships to broaden the diversity of the Agency’s workforce. Outreach to schools includes those with a focus on attracting and supporting students with disabilities that have career offices to help students obtain gainful employment. Additionally, OHR participates in recurring meetings with our Employee Resource Groups regarding the reasonable accommodation process and requirements.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

- a. New Hires for Permanent Workforce (PWD) Answer Yes
- b. New Hires for Permanent Workforce (PWTD) Answer Yes

Table B8 indicates the agency hired 8 PWD and 0 PWTD during FY2022 out of a total of 114 total new hires. This represents 8.70 percent PWD new hires and 0 percent for PWTD. Both of these amounts are below the goals of 12% and 2%, respectively.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

None of the new hires (n=21) for our largest mission critical occupation (series 0580) were self-identified as PWD or PWTD. Total -Qualified: 1,737 -Referred: 254 -Selected: 21 PWD - Qualified: 76 - Referred: 13 - Selected: 0 PWTD - Qualified: 26 - Referred: 6 - Selected: 0 This suggests a trigger for both PWD and PWTD among new hires in the permanent mission critical workforce.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

No internal promotions self-identified as PWD. There were no MCO internal promotions that self-identified as PWTD (n=53). PWD - Relevant Pool: 11.8% - Applied: 206 (9.99%) - Qualified: 22 (6.40%) - Selected: 0 PWTD - Relevant Pool: 3% - Applied: 111 (5.38%) - Qualified: 16 (4.65%) - Selected: 0

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Promotions for MCO (PWD) Answer Yes

No internal promotions self-identified as PWD. There were no MCO internal promotions that self-identified as PWTD (n=53). PWD - Relevant Pool: 11.8% - Applied: 206 (9.99%) - Qualified: 22 (6.40%) - Selected: 0 PWTD - Relevant Pool: 3% - Applied: 111 (5.38%) - Qualified: 16 (4.65%) - Selected: 0

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

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

A. ADVANCEMENT PROGRAM PLAN

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

The NCUA's primary occupation is the Credit Union Examiner (CUE). Entry-level CUE positions are advertised and recruited as a career ladder position with promotion opportunity to a target level of CU-12. CUEs are provided extensive training to develop and reach the full performance level. Note: All CUE announcements are open to Schedule A candidates. The agency also advertises Leadership Development Programs, which are open to all employees at all levels. Briefings are provided to employees prior to the programs opening to ensure employees understand the development opportunities, 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.

The agency launched a Leadership Development Strategy that outlines the agency's leadership strategy and vision, which includes four pillars, the competencies needed throughout the employee's leadership journey. Leadership developmental training opportunities are offered through the OHR's Division of Training and Development. The programs are designed to provide competency-based leadership training. These programs include:

- Aspiring Leader Program: a program offered by the Graduate School's Center for Leadership and Management.
- Executive Leadership Program: a 9-month program offered to non-supervisors. Participants complete a variety of activities including a developmental detail, formal training sessions, etc.
- Management Development Program: an 18-month developmental program for non-supervisors. Candidates gain experience in defining project scopes, delegating work, developing others, etc.
- Excellence in Government Fellows: a 12-month program for supervisors/managers. Candidates are able to enhance their skills through a combination of coursework, action-learning projects, executive coaching, and government-wide networking. Fellows remain in their full-time jobs, meet every 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.
- 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. Also, some leadership development programs such as the Management Development Program are 2-year programs and applications were processed in FY21 so those are not reported here even though participants remain in those programs through FY22.

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 (#)
Internship Programs						
Coaching Programs	52	52	9	9	0	0
Fellowship Programs						
Training Programs						
Detail Programs						
Other Career Development Programs	15	7	4	1	2	1
Mentoring Programs						

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer No
- b. Selections (PWD) Answer No

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer No
- b. Selections (PWTD) Answer No

There were two PWTD applicant and selection to the Leadership Development Programs. Coaching is offered for senior staff and supervisors.

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

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

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

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

(Table B11, relevant applicant pool = CU grade below) SES (SSP): 12 vacancies; 479 applied; 112 qualified; 77 referred; 10 hired. PWD relevant applicant pool: 6.26; 30 applied (6.26%); 8 qualified (7.14%); 0 selected. CU15: 16 vacancies; 520 applied; 162 qualified; 141 referred; 15 hired. PWD relevant applicant pool: 10.7; 56 applied (10.77%); 15 qualified (9.26%); 14 referred (9.93%); 1 selected (6.67%). CU14: 23 vacancies; 1,037 applied; 232 qualified; 184 referred; 21 hired. PWD relevant applicant pool: 10.9; 114 applied (10.99%); 20 qualified (8.62%); 20 referred (10.87%); 2 selected (9.52%). CU13: 19 vacancies; 634 applied; 187 qualified; 149 referred; 31 hired. PWD relevant applicant pool: 7.4; 47 applied (7.41%); 8 qualified (4.28%); 8 referred (5.37%); 0 hired.

2. Does your agency have a trigger involving PWTB 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 (PWTB)	Answer	No
ii. Internal Selections (PWTB)	Answer	Yes
b. Grade GS-15		
i. Qualified Internal Applicants (PWTB)	Answer	No
ii. Internal Selections (PWTB)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWTB)	Answer	No
ii. Internal Selections (PWTB)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTB)	Answer	Yes
ii. Internal Selections (PWTB)	Answer	Yes

(Table B11, relevant applicant pool = CU grade below) • SES (SSP): 12 vacancies; 479 applied; 112 qualified; 77 referred; 10 hired. • PWTB relevant applicant pool: 0.73 • 16 applied (3.34%) • 2 qualified (1.79%) • 0 hired • CU15: 16 vacancies; 520 applied; 162 qualified; 141 referred; 15 hired • PWTB relevant applicant pool: 1.83 • 40 applied (7.69%) • 9 qualified (5.56%) • 1 selected (6.67%) • CU14: 23 vacancies; 1,037 applied; 232 qualified; 184 referred; 21 hired • PWD relevant applicant pool: 2.7 • 66 applied (6.37%) • 13 qualified (5.60%) • 13 referred (7.07%) • 1 hired (4.76%) • CU13: 19 vacancies; 634 applied; 187 qualified; 149 referred; 31 hired • PWTB relevant applicant pool: 3.83 • 21 applied (3.31%) • 6 qualified (3.21%) • 6 referred (4.03%) • 0 hired.

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

Qualified applicant pool (QAP) (Table B15) SES (SSP): 508 applied, 374 qualified, 49 referred, 3 new hires PWD • 24 applied (4.72%) • 15 qualified (4.01%) • 3 referred (6.12%) • 0 selected CU-15: 436 applied, 159 qualified, 45 referred, 2 new hires PWD • 34 applied (7.80%) • 7 qualified (4.40%) • 3 referred (6.67%) • 0 selected CU-14: 1,525 applied, 831 qualified, 210 referred, 5 new hires PWD • 94 applied (6.16%) • 41 qualified (4.93%) • 12 referred (5.71%) • 0 selected CU-13: 2,170 applied, 542 qualified, 152 referred, 8 new hires PWD • 148 applied (6.82%) • 30 qualified (5.54%) • 8 referred (5.26%) • 0 selected.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

Qualified applicant pool (QAP) (Table B15) SES (SSP): 508 applied, 374 qualified, 49 referred, 3 new hires PWD • 24 applied (4.72%) • 15 qualified (4.01%) • 3 referred (6.12%) • 0 selected CU-15: 436 applied, 159 qualified, 45 referred, 2 new hires PWD • 34 applied (7.80%) • 7 qualified (4.40%) • 3 referred (6.67%) • 0 selected CU-14: 1,525 applied, 831 qualified, 210 referred, 5 new hires PWD • 94 applied (6.16%) • 41 qualified (4.93%) • 12 referred (5.71%) • 0 selected CU-13: 2,170 applied, 542 qualified, 152 referred, 8 new hires PWD • 148 applied (6.82%) • 30 qualified (5.54%) • 8 referred (5.26%) • 0 selected

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

The NCUA does not identify a separate “manager” category. Executives (senior staff) are also managers, so we choose to use that category. Supervisors here are those that are not senior staff (SSP). Executive (SSP) total: 479 applied, 112 qualified, 77 referred, 10 selected RAP = 5.47% PWD applied: 30 PWD qualified: 8 (7.14%) PWD selected: 0 Supervisor total: 654 applied, 246 qualified, 214 referred, 20 selected RAP = 9.89% PWD applied: 65 (9.94%) PWD qualified: 20 (8.13%) PWD referred: 20 (9.35%) PWD selected: 0

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Executives
 - i. Qualified Internal Applicants (PWTD) Answer Yes
 - ii. Internal Selections (PWTD) Answer Yes
- b. Managers
 - i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer N/A

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer Yes

ii. Internal Selections (PWTD) Answer Yes

The NCUA does not identify a separate "manager" category. Executives (senior staff) are also managers, so we choose to use that category. Supervisors here are those that are not senior staff (SSP). Executive (SSP) total: 479 applied, 112 qualified, 77 referred, 10 selected RAP = 2.84% PWTD applied: 16 (3.34%) PWTD qualified: 2 (1.79%) PWTD selected: 0 Supervisor total: 654 applied, 246 qualified, 214 referred, 20 selected RAP = 6.13% PWTD applied: 45 (6.88%) PWTD qualified: 14 (5.69%) PWTD referred: 14 (6.54%) PWTD selected: 0

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 N/A

c. New Hires for Supervisors (PWD) Answer Yes

The NCUA does not identify a separate "manager" category. Executives (senior staff) are also managers, so we choose to use that category. Supervisors here are those that are not senior staff (SSP). Executive (SSP) total: 508 applied, 374 qualified, 49 referred, 3 selected RAP = 5.47% PWD applied: 24 (4.72%) PWD qualified: 15 (4.01%) PWD selected: 0 Supervisor total: 357 applied, 95 qualified, 40 referred, 0 selected RAP = 9.89% PWD applied: 35 (9.80%) PWD qualified: 4 (4.21%) PWD referred: 2 (5.0%) PWD selected: 0

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 N/A

c. New Hires for Supervisors (PWTD) Answer Yes

The NCUA does not identify a separate "manager" category. Executives (senior staff) are also managers, so we choose to use that category. Supervisors here are those that are not senior staff (SSP). Executive (SSP) total: 508 applied, 374 qualified, 49 referred, 3 selected RAP = 2.84% PWTD applied: 12 (2.36%) PWTD qualified: 6 (1.60%) PWTD selected: 0 Supervisor total: 357 applied, 95 qualified, 40 referred, 0 selected RAP = 6.13% PWTD applied: 17 (4.76%) PWTD qualified: 2 (2.11%) PWTD selected: 0

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 N/A

NCUA did not have any eligible Schedule A staff for conversion in 2022.

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

In FY2022, there were 117 total separations: 21 were PWD and 8 were PWTD. PWD Overall Separation Rate: 17.95%; PWD Resignation: 7.32%; PWD Retirement: 24.44%; PWD Other: 0.

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	No

In FY2022, there were 117 total separations: 21 were PWD and 8 were PWTD. PWTD Overall Separation Rate: 6.84%; PWTD Resignation: 2.44%; PWTD Retirement: 11.11%; PWTD Other: 0.

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

OHR reviewed exit survey data with OMWI and found no comments suggesting that disability was the reason for separation. NCUA does not have a higher separation rate for PWD than non-PWD.

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

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

The Office of the Chief Information Officer created a Section 508 Resource Center on our internal NCUA Central site. This offers training resources for staff and contractors, as well as other resources for meeting and learning about accessibility. There is also a dashboard available within NCUA’s intranet that allows staff to view the progress of improving accessibility for the most highly visited sites and applications. The Office of External Affairs and Communications has identified, and continues to actively identify, areas that need remediation and/or updating. New NCUA content has to be accessible before it is posted on the public-facing websites. The Office of External Affairs and Communications works with content owners and creators to remediate deficiencies. Accessibility language has been updated in the Communications Manual.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The time frame for processing initial requests for a reasonable accommodation averages 10-25 business days.

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

The RA program was realigned to the Office of Human Resources at the beginning of 2021 to establish a firewall between the EEO Director and the Reasonable Accommodation Program Manager, thereby keeping the RA process and determinations separate from the EEO program. The NCUA's RA program includes timely processing and approvals of accommodation requests. In CY 2022, a total of 30 reasonable accommodation cases were completed with an average processing time of 25 days. The Reasonable Accommodation Program Manager tracks by types of accommodations requested; testing accommodations, equipment needs, and as we return to a hybrid environment, full-time telework. The NCUA conducts RA training for all new supervisors and plans to conduct four reasonable accommodation refresher training sessions for all supervisors in CY 2023. NCUA's RA specialists provide 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 EEOC's Agency Oversight Division within the Office of Federal Operations provided the OMWI office feedback and guidance based on EEOC's review of the updated draft reasonable accommodation instruction. The 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 N/A

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 N/A

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. There was only one complaint involving harassment due to disability, and there has been no finding of discrimination.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

The agency had no findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year.

Section VII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer No

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:	There are triggers for individuals with disabilities and individuals with targeted disabilities in the areas of new hires, promotions, separations, and awards.				
Provide a brief narrative describing the condition at issue.					
How was the condition recognized as a potential barrier?					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i>				
	People with Disabilities				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER:	Barrier Name	Description of Policy, Procedure, or Practice			
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	PE Exam Process	An initial Principal Examiner (PE) Exam barrier analysis has identified potential barriers for RNO and gender and disability. Since credit union examiners are 2/3 of the NCUA workforce, any triggers or barriers that affect that occupational series make a large impact on retention, and on other factors that influence retention such as career development, promotions, awards, and ultimate separation.			
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
10/01/2019	10/31/2023	Yes			Review policies, practices, and procedures that may be creating 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 and the NCUA Office of Human Resources is implementing its plan of action to address these barriers and eliminate or mitigate their impact on credit union examiners' career progression.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
OMWI Director		Miguel Polanco		Yes	
OHR Director		Towanda Brooks		Yes	

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2023	Root cause analysis/Further adverse impact analysis of PE test. The NCUA utilized services from the Office of Personnel Management to evaluate the Principal Examiner promotional process for adverse impact. The PE test is the process through which examiners obtain promotions. The results of this test and adverse impact relative to individuals with disabilities were evaluated by agency leadership in its Talent Mgmt Council. The agency plans to continue monitoring and evaluating any contributing barriers in the coming year. The TMC worked with OHR and OPM to develop a survey for examiners and supervisory examiners. OPM and OHR convened focus groups to define the appropriate questions to determine the successful preparation techniques of the examiners who passed the PE test. The results from the survey and the subsequent analysis have been used to identify 12 perceived barriers. The NCUA has developed strategies to address these perceived barriers and began the implementation process.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
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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.