



2020















ANNUAL REPORT



Office of Minority and Women Inclusion

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Introduction

The Office of the Comptroller of the Currency (OCC) charters, regulates, and supervises national banks and federal savings associations and licenses, regulates, and supervises the federal branches and agencies of foreign banking organizations. The OCC's mission is to ensure that these institutions operate in a safe and sound manner, provide fair access to financial services, treat customers fairly, and comply with applicable laws and regulations. The OCC is an independent, non-appropriated bureau of the U.S. Department of the Treasury.

The OCC's Strategic Plan for Fiscal Years 2019–2023 establishes three primary goals towards the achievement of the OCC's vision as the preeminent prudential supervisory agency. These strategic goals will ensure that the OCC (1) fosters a safe, sound, and fair federal banking system that is a source of economic strength and opportunity that meets the evolving needs of consumers, businesses, and communities; (2) engages, prepares, and empowers its employees to meet the mission; and (3) operates efficiently and effectively.

The fulfillment of the agency's core mission of bank supervision depends on its employment of talented staff with high levels of expertise and experience. To maintain a competent, highly qualified workforce, the OCC is fully committed to using and retaining employees' skills, while recruiting the best talent available from a variety of sources. The agency is also committed to maintaining an inclusive culture and workplace environment with a diversity strategy that focuses on leadership commitment, recruitment, development, retention, work/life balance, and an engaging culture. The OCC is equally committed to the inclusion of minorities, women, and minority- and women-owned businesses at all levels of the agency's business activities.

In compliance with section 342 of the Dodd–Frank Wall Street Reform and Consumer Protection Act (Dodd–Frank),¹ the OCC established its Office of Minority and Women Inclusion (OMWI) in January 2011 to be responsible for all matters of the agency relating to diversity in management, employment, and business activities. Dodd–Frank requires each OMWI agency² to submit an annual report to Congress regarding actions taken pursuant to section 342. The OCC's *Fiscal Year 2020 Annual Report to Congress* covers such actions and information for the period of October 1, 2019, through September 30, 2020.

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¹ 12 USC 5452.

² The federal financial agencies required to establish an OMWI under section 342 are the Board of Governors of the Federal Reserve System (Board), each of the Federal Reserve Banks, Consumer Financial Protection Bureau (CFPB), Department of the Treasury, Federal Deposit Insurance Corporation (FDIC), Federal Housing Finance Agency (FHFA), National Credit Union Administration (NCUA), OCC, and Securities and Exchange Commission (SEC).

Executive Summary

Business Activities

For fiscal year 2020, the OCC's total payments to contractors were \$147,285,440.33. Payments to minority-owned or women-owned businesses (MWOB) represented 36.4 percent of this total, payments to minority-owned businesses (MOB) represented 22.6 percent, and payments to women-owned businesses (WOB) represented 16.6 percent. Comparing fiscal year 2020 with the average of the previous four fiscal years, the percentage of payments to MWOBs was lower (36.4 percent versus the previous four-year average of 41.1 percent); the percentage of payments to MOBs was lower (22.6 percent versus the previous four-year average of 30.7 percent); and the percentage of payments to WOBs was higher (16.6 percent versus the previous four-year average of 13.1 percent). During fiscal year 2021, the OCC will focus on opportunities to increase contracting with MOBs, particularly in the OCC's largest spending area, computer-related purchases.

The OCC participated in several technical assistance events for MWOBs. The OCC also co-hosted the Connections That Count technical assistance event in December 2019, which provided information, resources, and networking opportunities for MWOBs to build and expand federal contracting opportunities. Event highlights included sessions on creating winning teaming arrangements; sharing tools on how former small businesses grew; and conducting successful market research. Attendee feedback was positive and highlighted the value of learning about leading practices.

Workforce Diversity and Inclusion

Although the OCC's permanent workforce declined in fiscal year 2020 from the previous year, the participation rate of females remained steady and minority participation increased. All major equal employment opportunity (EEO) groups were at or near parity with the 2010 national civilian labor force (NCLF)³.

Over the last five years, the OCC's hiring rates for minority groups were above their NCLF or generally improved, except those of Hispanics. Separation rates for females and Hispanics were generally below their average workforce participation rates over the same period. Hispanics were promoted above their respective workforce participation rate over the last five years.

The OCC improved its overall workforce participation rate of Hispanics to 7.6 percent in fiscal year 2020 from 7.4 percent in fiscal year 2019, although it remains below the NCLF of 10.0 percent. Hispanic participation rates in the agency are below parity in the following occupational positions—economists, bank examiners (females), and "all other series." In fiscal year 2020, the OCC's OMWI, in partnership with its Hispanic employee network group,

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³ NCLF data are derived from the 2010 census reflecting persons 16 years of age or older who are employed or are actively seeking employment and adjusted for citizenship, excluding those in the Armed Services. The OCC's workforce demographics benchmark comparisons are made against the 2010 NCLF availability rates and the occupational CLF (OCLF) availability rates for the OCC's three major occupational groups—bank examiners, attorneys, and economists. See appendix G for more details.

completed a Hispanic Barrier Analysis (HBA) Project that resulted in an HBA Action Plan. The plan was approved by the agency's senior management in fiscal year 2020, and efforts to implement the action items will continue in fiscal year 2021.

The OCC's population of female bank examiners remained steady at 38.4 percent in fiscal year 2020 and remains below the occupational civilian labor force (OCLF) rate of 45.3 percent. Female bank examiners separated at a rate (34.1 percent) below their workforce participation rate (38.4 percent) and their rate of separation in fiscal year 2019 (43.8 percent), but above their hiring rate (30.5 percent) in the current fiscal year.

In fiscal year 2020, females across all occupational groups participated at 44.3 percent in the OCC workforce and held 39.1 percent of supervisor positions and 31.5 percent of senior-level positions (SLP), an improvement from fiscal year 2019 participation rates. Minorities across all occupational groups participated in the workforce at 36.0 percent and held 28.2 percent of supervisor positions and 25.9 percent of SLP. Minority participation in supervisor positions increased from the previous year, while participation in SLP decreased.

Regulated Entities

The OCC sent letters to 225 CEOs of its supervised financial institutions to request submissions of diversity self-assessments for calendar year 2019. The lower-than-expected response rate of 9.8 percent was due to banks' shifting focus to COVID-19 priorities. During the review of 2019 diversity self-assessments from responding banks, the agency noted the following:

- The majority of banks noted strong commitments to diversity and inclusion (D&I) evidenced by inclusion of D&I in banks' strategic plans; senior-level management oversight of D&I efforts; and proactive measures to foster slates of diverse candidates for senior leadership and board positions.
- Banks reported consistent implementation of D&I policies to comply with laws and prohibit employment discrimination, as well as practices to ensure equal employment opportunities for all employees and applicants.
- The procurement and supplier diversity functions remain challenging, as shown by a decline in the number of banks reporting the existence of supplier diversity policies, designated procurement officers, practices to promote a diverse supplier pool, or metrics to evaluate procurement spending. More concerted and specific efforts are warranted to ensure banks are providing minority- and women-owned businesses fair access to compete for contracting and procurement opportunities.
- Transparency of banks' diversity and inclusion policies and programs remains a concern.
 Less than 50 percent of banks reported having publicized their D&I strategic plans, shared
 information on mentorship/developmental programs, or published opportunities to foster
 diversity. The OCC encourages enhanced efforts to achieve transparency of banks' diversity
 self-assessments and D&I programs.

• OMWI's outreach to bankers in 2019 consisted of two interagency Diversity and Inclusion Summits and an American Bankers Association (ABA) webinar. Additionally, the OCC's OMWI Executive Director held diversity discussions with the chief diversity officers of two of the agency's large banks. OMWI will continue to seek opportunities to engage virtually with institutions in 2021.

Financial Literacy

The OCC's Community Affairs office commented on the draft Financial Literacy and Education Commission (FLEC) 2020 National Financial Literacy Strategy; coordinated the OCC's responses to the Organization for Economic Cooperation and Development's questionnaire on financial consumer protection measures implemented in response to the COVID-19 emergency; and updated the OCC's information on MyMoney.gov.

The OCC's District Community Affairs Officers (DCAO) organized and co-sponsored numerous webinars around the country on banks and regulatory response during the COVID-19 pandemic. The goal of these webinars was to share best bank practices and clarify the regulatory treatment of bank activities during, and in response to, the pandemic. The DCAOs also reported 33 activities involving financial literacy or financial inclusion across the country.

Business Activities

Fiscal Year 2020 Payments

- 1. Statement of the total amounts the OCC paid to contractors during the reporting period:
 - Total payments to contractors were \$147,285,440.33.4
- 2. Percentage of the OCC's total payments to MWOBs; MOBs; and WOBs:
 - Payments to MWOBs were \$53,615,063.57, representing 36.4 percent of the OCC's total contractor payments.⁵
 - Payments to MOBs⁶ were \$33,302,638.51 representing 22.6 percent of the OCC's total contractor payments.
 - Payments to WOBs⁷ were \$24,512,715.98, representing 16.6 percent of the OCC's total contractor payments.

For a detailed explanation of the OCC's method and data sources for reporting payments, refer to appendix A.

Five-Year Trend in Payments to MWOBs, MOBs, and WOBs

Comparing fiscal year 2020 with the previous fiscal year, the percentage of payments to MWOBs was lower (36.4 percent compared with 40.9 percent); the percentage of payments to MOBs was lower (22.6 percent compared with 31.6 percent); and the percentage of payments to WOBs was higher (16.6 percent compared with 13.4 percent) (see figure 1).

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⁴ "Payments" are the net amounts, after any discounts, the OCC paid to contractors during the current fiscal year, regardless of when the awards were entered into the Federal Procurement Database System—Next Generation (FPDS-NG). Because contractors may submit invoices to the OCC after the close of the fiscal year in which the awards were made, the OCC's total payments to contractors during a given fiscal year may differ slightly from the total awards. For details of the specific amounts the OCC paid and awarded to MWOBs, MOBs, WOBs, and MOB demographic groups, refer to appendixes B and C.

⁵ Payments to businesses that are both minority- and women-owned are counted only once in the total dollars paid and percentage paid to MWOBs. For fiscal year 2020, payments to businesses that were neither MOBs nor WOBs were \$93,670,376.76 representing 63.6 percent of the OCC's total contractor payments.

⁶ Payments to MOBs include all businesses that indicate they are minority-owned in the U.S. government's System for Award Management (SAM).

⁷ Payments to WOBs include all businesses that indicate they are women-owned in the SAM.

Comparing fiscal year 2020 with the average of the previous four fiscal years (2016–2019), the percentage of payments to MWOBs was 36.4 percent versus the previous four-year average of 41.1 percent; the percentage of payments to MOBs was 22.6 percent versus the previous four-year average of 30.7 percent; and the percentage of payments to WOBs was 16.6 percent versus the previous four-year average of 13.1 percent.

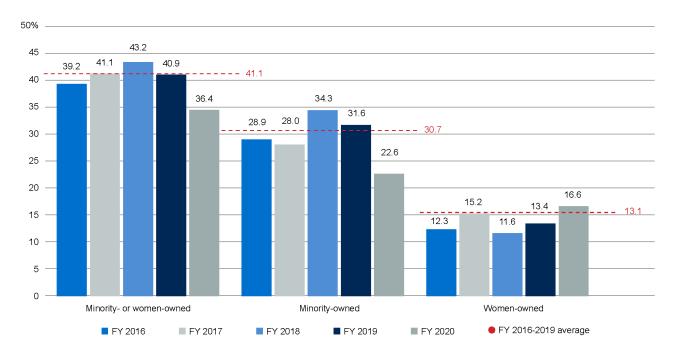


Figure 1: Payments to MWOBs, MOBs, and WOBs as a Percentage of Total OCC Payments, Five-Year Trend

Source: Core Financial System and FPDS-NG for FY 2016 to FY 2020.

Five-Year Trend in Payments to MOB Demographic Groups

In addition to the section 342 requirement to report the total amounts and percentage of payments to MWOBs, MOBs, and WOBs, the OCC also tracks payments to MOB demographic groups (see figure 2). Specifically, the OCC reports payments to Asian American-owned businesses, Black American-owned businesses, Hispanic American-owned businesses, Native American-owned businesses, and Other MOBs. 10

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⁸ "Asian American" means Asian-Pacific Americans (persons with origins from Burma, Thailand, Malaysia, Indonesia, Singapore, Brunei, Japan, China, Taiwan, Laos, Cambodia (Kampuchea), Vietnam, Korea, the Philippines, Republic of Palau, Republic of the Marshall Islands, Federated States of Micronesia, the Commonwealth of the Northern Mariana Islands, Guam, Samoa, Macao, Hong Kong, Fiji, Tonga, Kiribati, Tuvalu, or Nauru) and Subcontinent Asian (Asian-Indian) Americans (persons with origins from India, Pakistan, Bangladesh, Sri Lanka, Bhutan, the Maldives Islands, or Nepal). See 48 CFR 52.219-1.

⁹ "Native American" means American Indians, Eskimos, Aleuts, or Native Hawaiians. See 48 CFR 52.219-1.

¹⁰ "Other MOBs" means those businesses designating "minority-owned" in the SAM, but not designating Asian American, Black American, Hispanic American, or Native American.

Fiscal Year 2020 Compared With Previous Year

Comparing fiscal year 2020 with the previous fiscal year, the percentage of payments to Black American-owned and Native American-owned businesses both increased:

- Black American-owned businesses was 1.2 percent in fiscal year 2020 compared with 0.8 percent in fiscal year 2019 (increase of 45.0 percent).
- Native American-owned businesses was 1.6 percent in fiscal year 2020 compared with 1.4 percent in fiscal year 2019 (increase of 16.9 percent).

Comparing fiscal year 2020 with the previous fiscal year, the percentage of payments to Asian American-owned, Hispanic American-owned, and Other MOBs all decreased:

- Asian American-owned businesses was 15.3 percent in fiscal year 2020 compared with 22.9 percent in fiscal year 2019.
- Hispanic American-owned businesses was 4.4 percent in fiscal year 2020 compared with 4.8 percent in fiscal year 2019.
- Other MOBs was 0.2 percent in fiscal year 2020 compared with 1.8 percent in fiscal year 2019.

Fiscal Year 2020 Compared With Average of Previous Four Fiscal Years

Comparing fiscal year 2020 with the average of the previous four fiscal years (2016–2019), the percentage of payments to Hispanic American-owned businesses increased; and the percentage of payments to Asian American-owned businesses, Black American-owned businesses, Native American-owned businesses, and Other MOBs all decreased:

- Asian American-owned businesses was 15.3 percent compared with previous four-year average of 22.6 percent.
- Black American-owned businesses was 1.2 percent compared with previous four-year average of 1.6 percent.
- Hispanic American-owned businesses was 4.4 percent compared with previous four-year average of 3.6 percent.
- Native American-owned businesses was 1.6 percent compared with previous four-year average of 2.4 percent.
- Other Minority-owned businesses was 0.2 percent compared with previous four-year average of 0.6 percent.

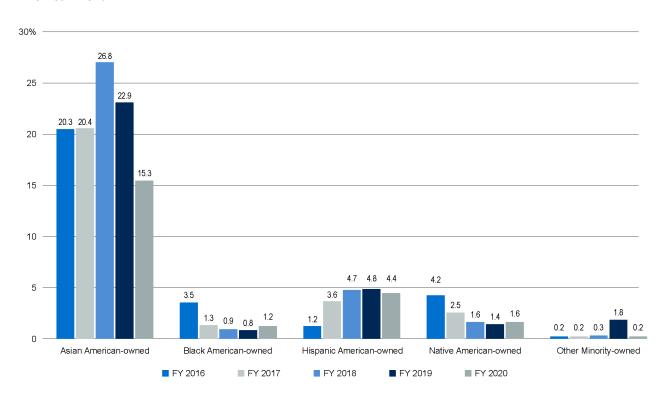


Figure 2: Payments to MOB Demographic Groups as a Percentage of Total OCC Payments, Five-Year Trend

Source: Core Financial System and FPDS-NG for FY 2016 to FY 2020.

The overall decrease in payments to MOBs was a result of several factors, including an overall decrease in contracting opportunities. Several large computer-related services contracts were recompeted and awarded to non-MOB businesses during fiscal years 2017 through 2020, which resulted in lower awards to Asian American-owned businesses and lower overall MOB payments. For details of the OCC's five-year payment trend to MOB demographic groups, refer to appendix B.

Trends in Awards by Classification of Suppliers

Each year the OMWI tracks the North American Industry Classification System (NAICS)¹¹ codes with the highest cumulative dollar amounts awarded by the OCC.¹² For fiscal year 2020, computer-related purchases (including other computer-related services; computer systems design services; and data processing, hosting, and related services) accounted for over two-thirds of the OCC's total dollars awarded (see figure 3).

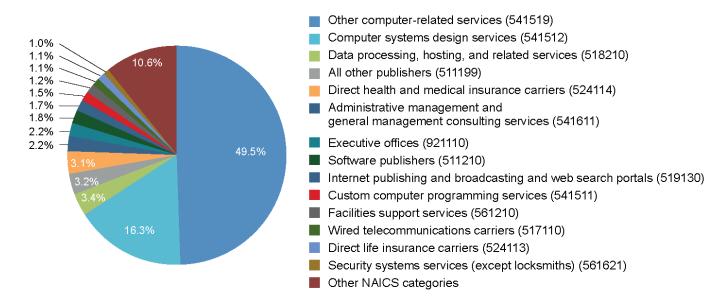


Figure 3: NAICS Codes With 1 Percent or Greater of Total OCC Award Dollars, FY 2020

Source: FPDS-NG for FY 2020.

The OMWI's analysis of the NAICS code award categories over the last five years has identified two trends. First, seven NAICS codes consistently account for more than three-quarters of the OCC's awards (see appendix D). Second, computer-related purchases are the largest expenditures by the OCC, consistently accounting for over two-thirds or more of the OCC's total dollars awarded (see appendix D).

The OCC reports on the classification of suppliers and includes this information in the OMWI's outreach materials to help businesses understand the types of industries in which the OCC spends the majority of its contracting dollars.

¹¹ The NAICS is the standard that federal statistical agencies use in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. The NAICS is a two- to six-digit hierarchical classification system, offering five levels of detail. Each digit in the code is part of a series of progressively narrower categories, and more digits in the code signify greater classification detail. The first two digits designate the economic sector, the third digit designates the subsector, the fourth digit designates the industry group, the fifth digit designates the NAICS industry, and the sixth digit designates the national industry.

¹² "Awards" are action obligations, which are the net amount of funds obligated or de-obligated. The FPDS-NG uses the NAICS code categories to track award data. For additional information on the method and data sources for reporting awards, refer to appendix A.

Analysis of Number of MOBs, WOBs, and Demographic Groups Participating and Dollars Awarded in Top NAICS Codes

To identify potential opportunities for increasing MWOB participation, the OMWI analyzed the OCC's top seven NAICS codes in relation to the demographics of contractors who provide these services. This analysis enables the OMWI to compare the percentage of businesses receiving OCC awards in each NAICS code with the percentage of MWOBs with capabilities in that particular code.

For example, MOBs represented 42.2 percent of businesses designated "other computer-related services" (the OCC's most-used NAICS code) and MOBs represented 23.1 percent of OCC awards in this category. Moreover, WOBs represented 25.8 percent of businesses designated "other computer-related services" and represented 24.4 percent of the OCC's awards in this category (see table 1). For "computer systems design services" (the OCC's second most-used NAICS code), MOBs represented 40.1 percent of the businesses in this category and the OCC awarded 20.9 percent to MOBs in this category; WOBs represented 24.2 percent of businesses designated "computer systems design services" and represented 13.5 percent of the OCC's awards in this category.

The OCC uses these data analyses to develop strategies around NAICS codes where the agency has low percentages of awards to MOBs or WOBs. For example, the OCC explores the OCC's awards for "other computer-related services" for additional opportunities where MWOBs could offer these services.

Table 1: Percentage of Businesses Participating in Top 7 NAICS Codes Compared With Percentage of OCC Awards in Top 7 NAICS Codes, FY 2020

		NAICS Codes and Description												
	541	519	541	512	518	518210 511199		524	114	54	1611	921	1110	
	Oth comp rela serv	uter ted	Com syst des serv	ems ign	Da proces hosting rela serv	ssing, g, and ted		other shers	Direct and m insur carr	edical ance	mana and g cons	istrative gement general sulting vices		cutive ices
Total number of businesses with OCC awards	6	2	1	0	1	5	,	1	1	I		10		1
Percentage of total OCC awards	49	.5	16	3.3	3.	4	3	.2	3.	.1	2	2.2	2	2
MOBs, WOBs, and demographic groups	% Part.	% Awarded	% Part.	% Awarded	% Part.	% Awarded	% Part.	% Awarded	% Part.	% Awarded	% Part.	% Awarded	% Part.	% Awarded
Minority-owned	42.2	23.1	40.1	20.9	41.0	50.0	26.8	100.0	29.1	0.0	41.8	-0.4	3.7	0.0
Women-owned	25.8	24.4	24.2	13.5	25.5	0.0	33.2	0.0	22.3	0.0	36.3	2.2	4.3	0.0
Asian American-owned	15.0	20.7	14.9	15.0	14.3	51.7	6.7	0.0	3.1	0.0	8.8	4.3	0.6	0.0
Black American-owned	19.3	0.1	17.8	3.0	18.7	-1.7	13.3	0.0	21.9	0.0	24.9	-4.4	2.2	0.0
Hispanic American-owned	6.0	1.5	5.9	2.9	6.0	0.0	4.5	100.0	4.5	0.0	6.3	-6.1	0.5	0.0
Native American-owned	4.5	0.7	4.0	0.0	4.5	0.0	4.0	0.0	2.3	0.0	4.1	5.7	1.2	0.0
Other non-specific minority demographic business	1.2	0.1	1.1	0.0	1.3	0.0	1.6	0.0	0.9	0.0	1.1	0.0	0.2	0.0

Source: FPDS-NG for FY 2020 and SAM Entity Management Extracts for October 2020. As the result of de-obligation in some NAICS codes, Black American-owned and Hispanic American-owned businesses received negative percentages.

The OMWI also analyzed data on the OCC's percentage of dollars awarded in the top seven NAICS codes to MOBs, WOBs, and MOB demographic groups (see appendix F). This analysis shows that there were awards to every demographic group in the OCC's most often-used NAICS code "other computer-related services." The OWMI develops and monitors procurement strategies that promote diversity and inclusion for both the number and the dollars awarded to MWOBs in each of its top NAICS codes.

Implementation of Standards and Procedures to Ensure Fair Inclusion

Beginning on March 1, 2012, the OCC inserted the "Standards and Procedures for OCC Contractor's Good Faith Efforts to Include Minorities and Women in the Contractor's Workforce"¹⁴ (Good Faith Efforts clause) into all new contracts of more than \$150,000. The

¹³ Specifically, Asian American-owned businesses received 20.7 percent; Black American-owned businesses received 0.1 percent; Hispanic American-owned businesses received 1.5 percent; Native American-owned businesses received 0.7 percent; and Other MOBs received 0.1 percent.

¹⁴ In the Good Faith Efforts clause, contractors affirm their commitment, as well as the commitment of their subcontractors, to make good faith efforts to include minorities and women in their workforces.

OMWI reviews contractors' good faith efforts, makes a determination whether any contractors have failed to make good faith efforts, and takes appropriate action as authorized by section 342.¹⁵

Since the OCC began requiring the Good Faith Efforts clause, the OMWI has reviewed 173 contractor submissions of good faith efforts, including 29 businesses during fiscal year 2020. ¹⁶ The businesses with more than 50 employees submitted copies of their affirmative action plans and other documentation to demonstrate good faith efforts to include minorities and women in their workforces. The OMWI reviewed these submissions and, to date, there have been no instances when a recommendation by the OMWI for further action has been necessary.

Many of the OCC's contractors were not required to submit Standard Form 100 (EEO-1) reports to the Equal Employment Opportunity Commission (EEOC)¹⁷ and were not subject to the Office of Federal Contract Compliance Programs requirements. ¹⁸ Contractors that had not previously been required to establish a written plan or program outlining their diversity efforts and results continue to create some challenges for the OMWI to substantiate their good faith efforts. The OMWI responded to these challenges by answering contractors' questions on the documentation required for the OMWI to assess good faith efforts. Given that over half of the businesses reviewed have fewer than 50 employees and have limited experience substantiating good faith efforts, the OMWI will continue providing technical assistance on contractors' compliance with the Good Faith Efforts clause and efforts toward the fair inclusion of minorities and women in their workforces.

Successes and Challenges in the OCC's Supplier Diversity Program

Technical Assistance and Outreach Program

Events and Collaborations

During fiscal year 2020, the OMWI engaged in numerous outreach activities to provide technical assistance, enhance awareness, and respond to potential contractors concerning OCC procurement opportunities. Specifically, OMWI representatives hosted, led, or were featured

¹⁵ The OCC requires a written affirmative action plan or other written program designed to ensure the fair inclusion of minorities and women in the contractor's workforce, including outreach, recruitment, and training efforts whereby the contractor sets forth specific, results-oriented policies and procedures.

¹⁶ The OMWI reviews contractor submission of good faith efforts if more than two fiscal years have elapsed since the prior review.

¹⁷ The EEOC requires EEO-1 reports for all federal contractors (private employers) who are not otherwise exempt and (1) have 50 or more employees and (2) are prime contractors or first-tier subcontractors and have a contract, subcontract, or purchase order amounting to \$50,000 or more.

¹⁸ The Office of Federal Contract Compliance Programs regulations implementing Executive Order 11246 require supply and service contractors—generally those with 50 or more employees and a contract of \$50,000 or more—to develop and maintain written affirmative action programs.

speakers at several events to provide technical assistance to MWOBs. OMWI representatives also exhibited and held matchmaking sessions at other external events (see appendix E).

As a result of COVID-19, in March 2020 all external outreach events were postponed and then canceled. The OCC worked cooperatively with MWOBs to assist in managing the impact of the pandemic on the MWOB community.

Supplier Diversity Initiatives

Since its inception in 2011, the OCC's OMWI technical assistance program and outreach efforts have helped the agency pay a total of over \$36 million to MWOBs. OMWI supplier diversity initiatives have directly contributed to 6.5 percent of the OCC's payments to MWOBs over the last 10 years.

On May 8, 2013, the OMWI developed an internal OCC Database for interested businesses to submit their capability statements and contact information. The OCC Database serves as a repository for early market research conducted by the OMWI, the OCC Acquisitions Division, and other OCC business units, as well as support for the OMWI's technical assistance efforts. At the end of fiscal year 2020, there were 726 businesses registered in the OCC Database (during fiscal year 2020, all businesses registered on the OCC Database were verified for security purposes and non-responsive businesses were deleted).

The OCC recognized the importance of its supplier diversity program by having an OMWI staff member maintain certification as a Certified Professional in Supplier Diversity (CPSD)¹⁹ with the Institute for Supply Management and also as a Certified Supplier Diversity Professional (CSDP) with the Alliance of Supplier Diversity Professionals.²⁰ In addition, with the introduction in fiscal year 2020 of Project REACh,²¹ the OCC is increasing its support for minority- and women-owned business enterprises (MWBE) by expanding the agency's supplier diversification efforts. Project REACh will focus on facilitating relationships between MWBEs and the banking industry by, for example, hosting virtual procurement fairs with minority business trade associations such as the U.S. Hispanic Chamber of Commerce and the National Black Chamber of Commerce.

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¹⁹ CPSD is a certification for supply management professionals whose responsibilities include supplier diversity and business professionals with responsibility for strategic diversity initiatives within their organizations.

²⁰ The Alliance of Supplier Diversity Professionals educates and develops supplier diversity advocates, enabling them to serve as competent liaisons between their employer, customers, and organizations that advocate for diverse suppliers and the diverse business community. The CSDP certification examination encompasses the following courses: Introduction to Supplier Diversity; Preparing Subcontracting Plans; Preparing for Customer Reviews; Mentor-Protégé Program; Customer Reporting; and Sourcing Strategies.

²¹ REACh stands for Roundtable for Economic Access and Change. The project brings together leaders from the banking industry, national civil rights organizations, business, and technology to reduce specific barriers that prevent full, equal, and fair participation in the nation's economy.

Workforce Diversity and Inclusion in Employment: Recruitment, Hiring, Career Development, and Retention

Current Status

Bank supervision is the OCC's core mission and the majority of its employees are bank examiners. Bank examination activities are supported by attorneys, economists, and various operational and administrative occupations referred to as "all other series" in this annual report.

As of September 30, 2020, the OCC's permanent workforce totaled 3,535 employees, a decline of 2.4 percent below the 3,622 permanent employees at the end of fiscal year 2019. The participation of females (44.3 percent) remained the same from fiscal year 2019, but declined from the fiscal year 2016 rate of 45.2 percent. Minority participation increased from fiscal year 2016 by 1.8 percentage points to 34.2 percent in fiscal year 2020. At the end of fiscal year 2020, all major EEO groups were at or near parity with the 2010 NCLF rates, with the exception of females and Hispanics. For changes in the OCC's workforce participation rates from fiscal year 2016 to 2020, and further breakdown of ethnicity and race indicator (ERI) groups and gender, see appendixes H and I.

Although the OCC continued to work to address the low participation of Hispanics in its workforce, their overall participation rate remained below their NCLF rate (see table 2). In fiscal year 2020, the OCC slightly increased its Hispanic participation rate to 7.6 percent, from 7.4 percent in fiscal year 2019, an improvement from 6.9 percent in fiscal year 2016. Hispanic participation rates are below parity in the following occupational positions—economists, bank examiners (females), and "all other series." Similarly, females across EEO groups in bank examiner positions participated below their OCLF rates. Hispanics and Whites (both males and females) and Black females in economist positions; and both Black and White male attorneys also participated below their respective OCLF rates. In addition, Hispanics and Whites (males and females) in "all other series" positions participated below their respective NCLF rates. For a further breakdown of ERI groups and gender by occupational positions in the OCC workforce profile, refer to appendix I. The fiscal year 2020 EEO-1 Report of OCC Occupational Categories is available in appendix J.

The Treasury Department provided a more representative benchmark comparison for the OCC's overall workforce—the relevant civilian labor force (RCLF) rate. This customized RCLF rate is based on the OCC's occupational composition and total workforce annually. The 2020 RCLF was calculated by comparing the OCLF availability rate from the 2010 census data with the percentage availability rate of each occupation represented in the OCC's workforce as of September 26, 2020. At the end of fiscal year 2020, all major EEO groups were above parity with RCLF rates, with the exception of females and Whites (see table 3).

Table 2: OCC Workforce Profile as of September 30, 2020

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
OCC workforce	3,535	55.7	44.3ª	9.7	17.5	7.6ª	1.3ª	64.0ª
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3
Bank examiner	2,349	61.6	38.4ª	7.6ª	11.9ª	7.5	1.2	71.8ª
2010 bank examiner OCLF		54.7	45.3	7.7	12.3	6.8	0.9	72.4
Attorney	164	51.2ª	48.8	9.8	4.9	9.8	0.6ª	75.0ª
2010 attorney OCLF		66.7	33.3	3.6	4.7	4.3	0.9	86.4
Economist	97	65.0	35.1	37.1	3.1ª	4.1ª	0.0ª	55.7ª
2010 economist OCLF		67.1	32.9	7.6	5.5	5.1	0.9	81.0
All other series	925	40.4ª	59.6	12.1	35.2	7.8ª	1.7ª	43.1ª
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3

Source: MD-715 workforce data table as of September 30, 2020.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Table 3: OCC Workforce Profile as of September 30, 2020, Compared With RCLF Rates

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
OCC workforce	3,535	55.7	44.3ª	9.7	17.5	7.6	1.3ª	64.0ª
2020 RCLF		43.2	56.8	4.7	9.0	7.2	1.4	77.8

Source: MD-715 workforce data table as of September 30, 2020.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Over the last five years, the OCC's hiring rates for Asians and males have consistently been above their NCLF rates, and Blacks were above their NCLF rate in four of those years. Comparatively, hiring rates for females, Hispanics, Small ERI groups, and Whites have generally been below their NCLF rates (see table 4).

^a EEO groups participating at rates below the 2010 NCLF and OCLF rates.

^a EEO groups participating at rates below the 2020 RCLF rates.

Table 4: OCC Hires, Five-Year Trend

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2016	382	57.6	42.4ª	9.7	17.5	9.2ª	1.3ª	62.3ª
FY 2017	239	56.5	43.5ª	9.2	17.2	9.6ª	1.1ª	61.9ª
FY 2018	163	59.5	40.5ª	14.7	12.9	12.3	1.2ª	58.9ª
FY 2019	92	62.0	38.0ª	14.1	14.1	9.8ª	2.2	59.8ª
FY 2020	168	61.9	38.1ª	8.3	11.3ª	8.3ª	1.8	70.2ª
2010 NCLF		51.9	48.1	3.9	12.0	10.0	1.8	72.3

Source: MD-715 workforce data table as of September 30, 2020.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Over the last five years, females, Hispanics, and Whites separated frequently below their average workforce participation rates. Comparatively, all other groups separated frequently above their average workforce participation rates. There were 248 separations in fiscal year 2020, a 20.2 percent net decrease from fiscal year 2019 (see table 5).

Table 5: OCC Separations, Five-Year Trend

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2016	288	59.0ª	41.0	4.9	11.8	7.6ª	0.7	75.0ª
FY 2017	283	55.8ª	44.2	7.4ª	17.0ª	6.7	1.8ª	67.1
FY 2018	286	58.0ª	42.0	6.3ª	16.8ª	6.6	2.1ª	68.2
FY 2019	298	47.7	52.4ª	6.3ª	15.8ª	8.4ª	2.0ª	67.5
FY 2020	248	59.3ª	40.7	4.8	15.7	5.2	1.2	73.0ª
Average OCC workforce participation rate		55.2	44.8	9.0	17.6	7.2	1.3	64.9

Source: MD-715 workforce data table as of September 30, 2020.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

In four of the last five years, the OCC's promotion rates for Hispanics and males were above their average workforce participation rates, while all other groups were generally below their rates (see table 6).

^a EEO groups hired at rates below the 2010 NCLF rates.

^a EEO groups separated at rates above their average workforce participation rates.

Table 6: OCC Promotions, Five-Year Trend

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2016	404	55.5	44.6	9.2	15.6	7.9	1.5ª	65.8ª
FY 2017	422	60.4	39.6ª	7.4	11.9ª	6.9ª	0.5ª	73.5
FY 2018	401	56.4	43.6ª	4.7ª	14.5ª	10.5	2.0	68.3ª
FY 2019	282	55.3	44.7	6.0ª	12.8ª	12.8	0.4ª	68.1ª
FY 2020	239	55.7	44.4ª	10.0	13.4ª	7.5	0.4ª	68.6
Average OCC workforce participation rate		55.2	44.8	9.0	17.6	7.2	1.3	64.9

Source: OCC HR Data Mart as of FY 2020.

Note: Small ERI groups are Native Americans, Native Hawaiians, and persons of two or more races combined.

Fiscal Year 2020 Focus Areas

Increasing the Participation of Hispanics

Strategic Recruitment, Hiring, and Retention

In fiscal year 2020, the OCC continued to address the low participation rate of Hispanics in its workforce. Hispanic participation rates increased to 7.6 percent in fiscal year 2020 from 7.4 percent in fiscal year 2019; this increase was a 0.7 percentage point improvement over the fiscal year 2016 rate of 6.9 percent. Even though the agency has made progress in the last five years, the OCC's Hispanic workforce participation rate (7.6 percent) remains below the NCLF rate of 10.0 percent, but above parity with the RCLF rate (7.2 percent). Hispanics were hired at 8.3 percent in fiscal year 2020, below the hiring rate of 9.8 percent in fiscal year 2019.

The overall workforce participation rate of Hispanics is influenced by their low participation rate in the OCC's non-major occupational groups, "all other series" (7.8 percent versus 10.0 percent NCLF rate). Hispanic participation in the "all other series" has increased since fiscal year 2019 (7.5 percent). Hispanics in "all other series" were hired at 9.4 percent, slightly below the NCLF rate of 10.0 percent. Separations of Hispanics in "all other series" improved in fiscal year 2020. They separated at 5.1 percent, below their workforce participation rate of 7.8 percent in fiscal year 2020 and the fiscal year 2019 separation rate of 8.0 percent (see table 7). For a gender breakdown of the OCC's Hispanic profile, see appendixes K and L.

^a EEO groups promoted at rates below their average workforce participation rates.

Table 7: Hispanic Profile by Occupational Positions, Five-Year Trend

			FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
	Hires	6.8	8.7	11.4	15.3	9.1	8.4
Bank examiner	Separations	2010	8.6 ^b	5.7	8.0 ^b	8.8 ^b	5.6
	OCC wrk. part.	OCLF	6.5ª	7.0	7.3	7.3	7.5
	Hires	4.3	25.0	0.0ª	0.0ª	0.0ª	0.0ª
Attorney	Separations	2010	0.0	25.0 ^b	0.0	7.7	0.0
	OCC wrk. part.	OCLF	7.9	6.7	7.4	9.5	9.8
	Hires	5.1	7.7	0.0ª	0.0ª	-	0.0ª
Economist	Separations	2010	0.0	0.0	0.0	0.0	0.0
	OCC wrk. part.	OCLF	4.3ª	4.1 ^a	3.9ª	4.1ª	4.1ª
	Hires	10.0	9.2ª	6.7ª	8.6ª	12.0	9.4ª
All other series	Separations	2010	5.9	7.8 ^b	5.0	8.0 ^b	5.1
	OCC wrk. part.	NCLF	7.7ª	7.5ª	7.6ª	7.5ª	7.8ª

Source: MD-715 workforce data table as of September 30, 2020.

Hispanics participated above the OCLF in the attorney occupation (9.8 percent versus 4.3 percent), and for males in the bank examiner occupation (4.3 percent versus 3.1 percent). Hispanic economists participated below their OCLF (4.1 percent versus 5.1 percent). In fiscal year 2020, Hispanic bank examiners were hired at rates exceeding their OCLF rates (8.4 percent versus 6.8 percent); there were no Hispanic economists or attorneys hired. Hispanic bank examiners separated at a lower rate than their participation in the workforce. The OCC had no separations of Hispanic attorneys and economists in fiscal year 2020 (see table 7).

In fiscal year 2020, the OCC completed the HBA Project. Some high-level findings showed that between 2003 and 2018,

- the average promotion rate for Hispanic non-examiners from NB VI to NB VII, compared with promotion rates of all non-examiners in these grades, was low at best and in many cases absent.
- the average promotion rate for Hispanic non-examiners in NB V to NB VI positions (when compared with promotion rates of all non-examiners in these grades) is almost twice their participation rate.
- two Hispanics were promoted to NB VIII compared with all NB VIII promotions, SLP. Two out of 77 promotions to NB VIII were for Hispanics.
- promotion from NB V to NB VI takes Hispanic examiners 1.4 years longer on average to achieve compared with promotion rates of all examiners in those grades.

^a Hispanic workforce participation (wrk. part.) and hiring rates below the relative 2010 NCLF or OCLF rates.

^b Hispanic separation rates above their workforce participation rate.

⁻ No hires in this occupation series for fiscal year 2019.

- results are mixed at the NB VII level. Over a longer period, the rate of promotion for Hispanic examiners at the NB VII level was more in line with their participation rate compared with promotion rates of all examiners at the NB VII level. More recent data, however, reflect promotions taking longer.
- Hispanic pre-commissioned bank examiners take 0.7 years longer on average to get to the NB V level compared with promotion rates of all pre-commissioned bank examiners.
- Hispanic employees relocated or changed duty stations at their workforce participation rate compared with all employees who relocated or changed duty station, and there is no evidence to support the hypothesis that Hispanics relocate less than other racial groups.

The HBA Project also reflected the Entry-Level Bank Examiner Recruitment Program continuing to be a significant source for Hispanic hiring at the aggregate level at the OCC, although this was not the case in each of the agency's four districts. More strategic recruitment efforts are under way to address the differences. In fiscal year 2020, 8.4 percent of entry-level bank examiners self-identified as Hispanics overall, above the 6.8 percent OCLF, but below the fiscal year 2019 participation rate of 13.1 percent.

The OCC conducted an applicant flow data analysis of the entry-level bank examiner recruitment campaign in 2020 (Fall 2019 and Spring 2020). The applicant pool rate for Hispanics who self-identified was 19.7 percent, with a selection rate of 10.9 percent; the applicant pool and selection rate both exceeded the Hispanic examiner OCLF rate of 6.8 percent.

In another analysis of all job vacancies that were closed in fiscal year 2020 (as of August 25, 2020), the applicant pool rate for Hispanics who self-identified was 13.0 percent with a selection rate of 8.9 percent; the applicant pool rate in these multi-job series exceeded the NCLF of 10.0 percent, while the selection rate fell below. Results indicated there was no evidence of a statistically significant shift in the ethnic composition of the applicant pool as they progressed to the decision process. This continues to be a marked improvement from significantly low applicant pool rates of the last few years. The OCC will continue to monitor the applicant pools and the impact of hiring processes.

The OCC maintains ongoing relationships with minority professional organizations and colleges and universities with large populations of minority and female students in accounting and finance. The OCC hired six students through the federal Pathways Internship Program, of whom five were minorities (16.7 percent Hispanic). In addition, the agency contracted for 27 interns²² through its National Diversity Internship Program in fiscal year 2020, the 10th year it has sponsored the program. The OCC worked with five groups that employed students: the Hispanic Association of Colleges and Universities; INROADS; Wire2Net; Minority Access; and The Washington Center.

In fiscal year 2020, the OCC established a Hispanic Recruitment Working Group with members from the Hispanic Organization for Leadership and Advancement (HOLA), the Human Capital Recruitment Team, and the OMWI to build a more impactful Hispanic recruitment strategy. The group identified 50 campus student organizations for efforts to increase the Hispanic applicant

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²² These contracted interns were not OCC employees and are not reflected in the workforce count; therefore, no demographic data are available.

pools for entry-level examiner positions. In addition, for fiscal year 2021, the OCC plans to host a career webinar to amplify opportunities to entry-level Hispanic students. The working group will also focus on more strategic recruitment efforts for experienced examiners and non-examiners.

During fiscal year 2020, the OCC recruited from the following Hispanic-serving institutions with accounting and finance as part of its entry-level bank examiner program: Arizona State University; California State University at Fullerton; California State University at Long Beach; California State University at Sacramento; Colorado State University; Florida International University; Lehman College; Mercy College; New Mexico State University; Northeastern Illinois University; San Jose State University; Texas A&M Corpus Christi; the University of Houston Downtown; the University of New Mexico; the University of St. Thomas; the University of Texas at El Paso; and the University of Texas San Antonio. The OCC also sought additional sources for entry-level bank examiner recruitment through the Association of Latin Professionals in Finance and Accounting, Handshake, and through the National Association of Colleges and Employers (NACE) Link OneStop, a national recruiting network with over 200 schools including minority-serving institutions. In addition, the OCC obtained data from NACE on the demographic makeup of its member institutions' accounting and finance graduating classes, to help determine which schools the OCC will recruit from to build more diverse applicant pools.

As part of its entry-level bank examiner program, the OCC actively recruited at minority-serving institutions including California State University, East Bay; Howard University; Jackson State University; Johnson C. Smith University; Morehouse College; Montana State University; Prairie View A&M; Texas Southern University; San Diego State University; Southeastern Oklahoma State University; Spelman College; St. John's University; Troy University; the University of Arkansas at Fort Smith; the University of Arkansas at Pine Bluff; the University of Central Oklahoma; the University of Houston; the University of Illinois, Chicago; the University of Maryland at College Park; the University of Memphis; the University of Southern California; the University of St. Thomas; the University of Texas at Arlington; the University of Washington; and Virginia State University. The OCC also received applications from individuals at other minority-serving institutions that were not part of the campus recruitment efforts. These unsolicited applicants helped to create even more diverse and talented applicant pools for the entry-level bank examiner program.

The OCC continued to benefit from the many contributions of its Hispanic employee network group (ENG), HOLA. HOLA supports the agency in its recruitment, career advancement, and retention strategies for developing a fully engaged Hispanic workforce. Members of HOLA served as recruiters/screeners and interview panelists during the entry-level bank examiner recruitment campaigns. HOLA members also represented the agency at various career forums, job fairs, and networking events that included partnering with the OMWI and several other departments to host members of the New York City chapter of ASPIRA at the OCC.

Participation of Hispanics in Leadership Positions

In fiscal year 2020, Hispanic males and females in leadership positions, in grades NB VI through NB IX were below their average workforce participation rate of 3.9 percent and 3.5 percent,

respectively. Between fiscal years 2019 and 2020, Hispanic male participation rates remained nearly the same at the NB VI level. During the same time, participation rates for Hispanic females increased or were maintained in grades NB VII and NB VIII-IX (see table 8).

In fiscal year 2020, one (5.9 percent) Hispanic female was promoted to the NB VII level, and two Hispanic employees (male and female) were temporarily promoted to supervisory positions from a NB VI to a NB VII at a rate (8.3 percent) above their workforce participation rate (7.6 percent).

Table 8: Hispanic Participation in NB VI through NB IX Grades, FY 2019 to FY 2020

Participation rates of EEO groups are in percentages and rounded up to the decimal.

			FY 2019		FY 2020			
	Average workforce participation	NB VI	NB VII	NB VIII IX (equiv. SLP)	NB VI	NB VII	NB VIII IX (equiv. SLP)	
Hispanic	7.5	7.0 ^a	4.5 ^a	5.7 ^a	6.5°	5.6ª	5.6 ^a	
Hispanic Male	3.9	3.8ª	2.6ª	3.8ª	3.7ª	3.0ª	3.7ª	
Hispanic Female	3.5	3.2ª	2.0 ^a	1.9 ^a	2.9 ^a	2.7 ^a	1.9 ^a	
Total Hispanic	267	80	14	3	81	17	3	
Total workforce		1,148	308	53	1,229	302	54	

Source: MD-715 workforce data table as of September 30, 2020.

The OCC conducted an applicant flow analysis by ethnicity and grade levels NB V through NB IX on vacancies closed in fiscal year 2020. The applicant pool rate for Hispanics was 12.8 percent, above the NCLF, and the selection rate was 7.8 percent, below the NCLF, demonstrating a statistical shift in the population of Hispanics as they progressed through the decision process. Efforts are under way to better track and monitor trend data on the diversity of applicant pools and selections.

Career Progression and Fostering More Inclusive Environment for Hispanics

In fiscal year 2020, the OCC promoted the full engagement of Hispanic participation in management, leadership, and career developmental programs. A number of the OCC's Hispanic staff (7.9 percent) participated in several formal and informal career development programs and training courses that provided continuous learning and growth opportunities in fiscal year 2020. Hispanic employees (7.2 percent) participated in agency-sponsored leadership training courses designed for managers, supervisors, and employees. Hispanic employees (5.5 percent) also participated in the agency's executive coaching program designed to address both immediate tactical issues and strategic long-term issues or opportunities, and to help leaders to align vision, actions, and performance. In fiscal year 2020, the OCC initiated Cohort II of the Leadership

^a EEO groups participated at rates below the average workforce participation rates.

Exploration and Development (LEAD) Program, of which Hispanics were 11.5 percent of the selectees. This robust training and development program is designed to develop leadership competencies at the team leader and/or manager level and foster a broader, enterprise perspective.

In fiscal year 2020, the Honors Attorney Program continued developmental opportunities for fiscal year 2018 hires – eight employees in total, including six law clerks, of whom four (66.7 percent) were Hispanics (there were no hires for the Honors Attorney Program in fiscal year 2019 or 2020). The program is designed to provide cross-training and developmental assignments to equip incoming attorneys (law clerks²³ and attorneys) with legal skills and experience across multiple legal practice areas.

Hispanic examiners also participated in developmental opportunities as Training Team Leaders and Training Team Assistants (4.3 percent) to new entry-level assistant national bank examiner (ANBE) hires in fiscal year 2020. Hispanic examiners also had the opportunity to serve as ANBE recruiters and writing coaches, and participated in the Uniform Commission Examination (UCE) Evaluator Cadre. Of the 49 bank examiners who passed the UCE in fiscal year 2020, 8.2 percent were Hispanic.

To support retention, HOLA continued to encourage networking, mentoring, and collaboration among its members. In fiscal year 2020, HOLA established an ANBE Mentorship Cadre for first-year entry-level Hispanic new examiner hires. The goal of the ANBE Mentorship Cadre is to welcome and help new hires navigate the OCC, enhance their early career experiences and the agency's ability to retain them, and expand its future pipeline. Through this cadre, HOLA sought to help address the retention issues identified in the HBA.

HOLA also partnered with the OCC's other ENGs and the agency's Leadership, Executive, and Organizational Development department to provide mentors to all new hires, starting with the fiscal year 2020 entry-level examiner hires. The cadre mentors are an additional resource along with their host assistant deputy comptrollers and training team leaders. Of the total of 33 mentors in the cadre, 10 mentors were assigned to new ANBE hires, of whom six mentors were from HOLA.

HOLA continued to offer its original career coaching program, in which members were paired with internal coaches and provided advice on available career paths, career progression, résumé writing, interviews, and training opportunities. In addition, HOLA continued to offer its "Speak to Lead" initiative, which provides HOLA members with real-time feedback on mock exit or board meeting presentations.

HOLA also partnered with the OMWI on the HBA Project and made presentations to several business units to continue to raise awareness of the interest to increase Hispanic participation at the OCC. HOLA hosted four teleconferences under its Speaker Series, one of which was on the HBA Project and another on diversity and inclusion lessons from the private sector. In fiscal year 2021, HOLA's teleconferences will include panel discussions on career development

²³ Law clerks in the Honors Program are those who are graduates of recognized law schools (in possession of an LL.B. or J.D. degree) but have not yet passed the bar examination.

opportunities. Additionally, in fiscal year 2021 HOLA will host networking sessions for experienced bank examiners to share their thoughts on career progression.

One of HOLA's former presidents and a current member of key HOLA committees was selected as the recipient of the OCC's 2019 Honorary Award for Excellence in Diversity and Inclusion (awarded in 2020).

In fiscal year 2021, the OCC will continue to focus efforts toward increasing the participation rate of Hispanics by maximizing targeted recruitment activities to attract Hispanic applicants to the "all other series" category while maintaining focus on entry-level examiner recruitment, and continuing to address Hispanic retention and career development issues.

Increasing the Participation of Female Bank Examiners

In fiscal year 2020, the workforce participation rate of female bank examiners remained steady at 38.4 percent from fiscal year 2019, below the OCLF rate of 45.3 percent. The hiring rate (30.5 percent) of female bank examiners was below their OCLF rate (45.3 percent) and the fiscal year 2019 hiring rate of 31.8 percent (see table 9).

The OCC's applicant flow data analysis of the 2020 entry-level recruitment campaign (which took place in the fall of 2019 and spring of 2020) showed females represented 39.5 percent of the applicant pool and 30.9 percent of selections, both below the OCLF rate (45.3 percent). In addition, the OCC conducted a separate applicant flow analysis on examiner vacancies closed in fiscal year 2020 (as of August 25, 2020), to include entry-level examiner selections. The analysis showed females were 38.8 percent of the applicant pool and 43.3 percent of the selections, both below the OCLF rate (45.3 percent). There was no evidence of a statistically significant shift in the gender composition of the applicant pool as they reached the selection process.

In fiscal year 2020, separation rates for female bank examiners notably improved. Their rate of separation (34.1 percent) was below their workforce participation rate (38.4 percent), and their rate of separation in fiscal year 2019 (43.8 percent). Of separating female bank examiners in fiscal year 2020, resignations and transfers represented 58.7 percent; retirements accounted for 39.7 percent (a decrease of 12.1 percentage points from fiscal year 2019); and removals/terminations made up 1.6 percent. Of the resignations and transfers, 48.7 percent were new hires (six or fewer years of employment) and 51.4 percent were mid-career employees (not new hires and not eligible for retirement).

In fiscal year 2020, the retirement eligibility pool (employees currently eligible and those expected to obtain eligibility within five years) for female bank examiners was 28.1 percent, compared with an average of 30.1 percent over the past five years. Because of the years of historical growth in the retirement eligibility pool before fiscal year 2017, as well as the resignations and transfers out of agency of new hires, retention of female bank examiners remains a challenge and therefore will continue to be monitored.

In fiscal year 2020, the OCC continued to use the Treasury Department Employee Exit Survey tool to gain information from separating employees about their work experiences. Office morale,

job stress, and travel requirements were most often cited by separating female bank examiners in exit survey responses. By identifying the areas of greatest concern for female bank examiners, the OCC can better understand contributing factors, target retention efforts, and develop strategies that align with the agency's overall mission and diversity and inclusion goals.

The OCC offers flexible work arrangements, including flex days, gliding work schedules to enable varying arrival and departure times, credit hours, and telework arrangements. A majority of employees take advantage of these schedules: 85.0 percent flex, 69.8 percent vary their work schedules, and 96.6 percent telework, with 79.3 percent of employees teleworking either on a recurring or situational basis at least once a month during the year. However, since the COVID-19 pandemic began in March 2020, the entire agency operated in a maximum telework status through June 2020 and then converted to an extended telework status, which is the agency's current status.

The OMWI works collaboratively with Bank Supervision management to identify barriers that may impede the realization of diversity goals affecting female bank examiners across all EEO groups. OCC management briefings highlighted departmental workforce trends and areas requiring special attention, including targeted recruitment, retention strategies, and succession planning.

Table 9: Female Bank Examiner Profile by EEO Groups, Five-Year Trend

		l	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
	Hires	45.3	34.4ª	37.1ª	34.7ª	31.8ª	30.5ª
Female	Separations	2010	37.3	35.1	34.6	43.8 ^b	34.1
	OCC wrk. part.	OCLF	38.7ª	38.9ª	39.1ª	38.4ª	38.4ª
	Hires	4.0	4.7	1.8ª	3.1ª	1.5ª	4.6
Asian female	Separations	2010	2.4	2.6	1.6	1.5	1.1
	OCC wrk. part.	OCLF	2.8ª	2.6ª	2.8ª	2.8ª	3.1ª
	Hires	8.7	6.7ª	7.2ª	3.1ª	3.0ª	3.8ª
Black female	Senarations	2010	5.7	8.3 ^b	8.5 ^b	4.7	5.0
	OCC wrk. part.	OCLF	6.8ª	6.7ª	6.4ª	6.4ª	6.4ª
	Hires	3.7	3.2ª	3.6ª	5.1	1.5ª	4.6
Hispanic female	Separations	2010	2.9 ^b	1.0	2.1	3.1	3.9 ^b
	OCC wrk. part.	OCLF	2.7ª	2.9ª	3.2ª	3.2ª	3.2ª
Small ERI	Hires	0.6	0.0ª	1.2	1.0	0.0ª	0.8
groups	Separations	2010	0.5	0.5	0.0	1.6 ^b	0.6
female	OCC wrk. part.	OCLF	0.6	0.6	0.6	0.5ª	0.6
	Hires	28.3	19.8ª	23.4ª	22.5ª	25.8ª	16.8ª
White female	Separations	2010	25.8	22.7	22.3	32.8 ^b	23.5
	OCC wrk. part.	OCLF	25.8ª	26.0ª	26.1ª	25.5ª	25.2ª

Source: MD-715 workforce data table as of September 30, 2020.

In fiscal year 2020, the OCC hired 107 entry-level bank examiners, of whom 30.8 percent were females, below the fiscal year 2019 hiring rate of 32.8 percent, despite concentrated recruitment efforts. The OCC researched, posted its entry-level announcements, developed relationships, held presentations and information sessions, participated in campus career fairs, and contacted the alumni associations at women's colleges such as College of Saint Benedict, Mills College, and Saint Mary's College. The OCC also engaged in similar activities at colleges and universities with large female student bodies in accounting and finance (50.0 percent or greater), including the following: Arizona State University; Eastern Illinois University; Indiana University of Pennsylvania; Pittsburg State University; North Dakota State University; Robert Morris University; Rutgers University – Newark; Southern Illinois University; the University of Maryland – College Park; the University of Missouri – St. Louis; the University of Southern California; the University of Wisconsin – LaCrosse; and the University of Washington. In fiscal year 2020, the OCC hired two financial interns, one of whom was female.

^a Female bank examiner workforce participation (wrk. part.) and hiring rates below the 2010 bank examiner OCLF rates.

^b Female bank examiner separation rates above their workforce participation rates.

Vacancy announcements for entry-level bank examiner positions were also posted on NACELink OneStop, which includes over 200 schools (including women's colleges), Handshake, and with the Women's Alliance. In addition, the OCC conducted outreach recruitment through LinkedIn at more than 25 women's associations and organizations, including Women in Housing and Finance, Women's Diversity Network, Women's World Banking, National Association for Female Executives, and National Council of Negro Women.

The OCC's national recruitment office, district recruitment specialists, and other human resources (HR) professionals from across the agency meet semiannually to discuss the entry-level bank examiner recruitment process and practices. This review includes recruitment strategies, campaign hiring results, and ways to evaluate and improve the recruitment process (e.g., outreach and sourcing, targeted schools and organizations, testing, interviewing process and participants, hiring results, tracking and analysis, and training for interviewers, interviewing panelists, and HR specialists). These meetings often result in process improvement changes. In addition, senior management and all key stakeholders are briefed periodically and after each hiring campaign on program changes and results, including an analysis of the applicant pool and hires. Process improvement efforts will continue at the national and district/field levels in fiscal year 2021.

In fiscal year 2020, 49 bank examiners successfully passed the UCE, of whom 36.7 percent were females, down from 37.5 percent in fiscal year 2019 and below their average availability pool rate of 38.5 percent. ²⁴ Typically, the OCC sponsors a career forum designed for bank examiners in pay band NB V who recently passed the UCE. However, due to the COVID-19 pandemic, no forums were held in fiscal year 2020. The main focus of the forum is to provide newly commissioned bank examiners with exposure to the career choices available in the bank supervision lines of business, hear about resources and factors to consider when making OCC career decisions, and network with senior leaders throughout the agency.

The EXCEL I Program, sponsored by the Large Bank Supervision (LBS) department, provides NB V bank examiners the opportunity to develop expertise in one of eight specialty areas. Interested bank examiners apply for permanent bank examiner positions within LBS and become part of a developmental team in one of the specialty areas for a 12- to 24-month period. Upon successful completion of the program, candidates remain in LBS to work within their specialty areas as members of a large bank resident team. In fiscal year 2020, 15 bank examiners were selected in EXCEL I classes: 26.7 percent (4) were female, 13.3 percent (2) were Asian, 13.3 percent (2) were Black, and 6.7 percent (1) were Hispanic.

Female bank examiners gain value from the agency's formal and informal mentoring programs, career and leadership development programs (examiner and non-examiner), career development opportunities, and related resources, including training curriculum and courses. Midsize and Community Bank Supervision (MCBS) and Systemic Risk Identification Support and Specialty Supervision sponsor rotational assignments to examiners interested in gaining experience in these lines of business. MCBS provides functional examiner-in-charge (FEIC) assignments in the

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²⁴ Of employees from minority groups who successfully passed the UCE, 8.2 percent were Hispanic, 12.2 percent were Asian, and 18.4 percent were Black. All minority groups passed the UCE in fiscal year 2020 at rates near or greater than in fiscal year 2019.

areas of Asset Management, Bank Information Technology, Capital Markets, Commercial Credit, Compliance, Corporate Governance, Mortgage Banking, and Retail Credit. In addition to FEIC assignments, several examiner-in-charge assistant assignments are also available. The ENGs serve as additional communicators of these opportunities to their members.

In an effort to improve retention of examiners in the agency, the OCC sponsors a Voluntary Transfer List Program, which gives examiners the opportunity to be considered for a local reassignment or reassignment to a different geographic location within the OCC. The OCC also established a formalized Examiner Rotational Program that provides examiners with a richer and more diverse set of experiences, promotes rotational cross-training opportunities, enhances professional and leadership development, supports agency succession planning, and strengthens supervisory processes and examiner expertise.

The OCC has long benefited from the value provided by The Women's Network (TWN). In fiscal year 2020, TWN promoted its highly successful mentoring circles as a continued vehicle to support mentoring for women, enabling opportunities for collaboration, networking, goal achievement, and the retention of women. Mentoring circle topics have included "Career Exploration," "Work/Life Balance," "Uniform Commission Examination Preparation," and "Leadership." TWN also hosted a national teleconference on "Achieving Balance by Setting Limits and Making Tough Choices," published two newsletters, continued its Resource Group Mentoring Program with two resource groups—"Managing Your Career" and "Work Life Navigation"— organized a presentation on male allyship during which the presenters spoke from their book *Athena Rising*, and promoted TWN events in OCC-wide internal communications.

In fiscal year 2021, the OCC will continue to focus efforts toward increasing the participation rate of female bank examiners, with special emphasis on recruitment and retention activities.

Increasing the Participation of Females and Minorities in Supervisor Roles and Senior-Level Positions

In fiscal year 2020, females participated at 44.3 percent in the OCC workforce. Females held 39.1 percent of supervisor positions ²⁵ and 31.5 percent of SLP, ²⁶ up from fiscal year 2019 participation rates by 1.1 percentage points and 1.3 percentage points, respectively. Minorities participated in the workforce at 36.0 percent and held 28.2 percent of supervisor positions and 25.9 percent of SLP, up from fiscal year 2019 participation rates by 1.2 percentage points in supervisor positions and down in SLP by 2.4 percentage points (see tables 10 and 11).

Participation rates of females increased in SLP, although they remain below their workforce participation rates. In supervisor roles, participation rates of all minority groups increased or remained nearly the same in fiscal year 2020. For additional details on participation rates from

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²⁵ Employees in supervisor roles and positions require the exercise of supervisory or managerial responsibilities as set forth in Office of Personnel Management directives, OCC classification guidance, and other related directives.

²⁶ Employees in pay band NB VIII and NB IX positions are equivalent to Senior Executive Service positions in the General Schedule.

fiscal year 2016 to 2020 of females and minorities in supervisor positions, SLP, and feeder grades, 27 refer to appendixes M and N.

OCC leadership recognizes and values the benefits of diversity in its management structure, and regularly engages in senior-level discussions about how to improve the diversity of candidate slates for hiring and promotion decisions.

Table 10: Participation in Supervisor Positions by EEO Groups, FY 2019 to FY 2020

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	FY 2	019	FY 2	2020	Supervisor
	OCC workforce participation	OCC supervisor participation	OCC workforce participation	OCC supervisor participation	participation percentage point change from FY 2019 to FY 2020
Male	55.7	62.1	55.7	60.9	-1.2
Female	44.3	38.0ª	44.3	39.1ª	+1.1
Minority male	16.8	14.6ª	17.0	15.3ª	+0.7
Minority female	18.8	12.4ª	19.0	12.9ª	+0.5
Minority	35.6	27.0ª	36.0	28.2ª	+1.2
Asian	9.4	8.1ª	9.7	7.8ª	-0.3
Black	17.6	12.9ª	17.5	12.4ª	-0.5
Hispanic	7.4	5.0ª	7.6	6.9ª	+1.9
Small ERI groups	1.2	1.0ª	1.3	1.1ª	+0.1
White	64.4	73.0	64.0	71.8	-1.2
White male	38.9	47.5	38.7	45.6	-1.9
White female	25.5	25.5	25.3	26.2	+0.7
Total	3,622	419	3,535	450	

Source: OCC HR Data Mart as of September 30, 2020.

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^a EEO groups participated at rates below their workforce participation rates.

 $^{^{\}rm 27}$ Feeder grades into SLP are pay bands NB VI through NB VII.

Table 11: OCC Participation in SLP by EEO Groups, FY 2019 to FY 2020

	FY 2	019	FY 2	SLP	
	OCC workforce participation	NB VIII IX (equiv. SLP)	OCC workforce participation	NB VIII IX (equiv. SLP)	participation percentage point change from FY 2019 to FY 2020
Male	55.7	69.8	55.7	68.5	-1.3
Female	44.3	30.2ª	44.3	31.5ª	+1.3
Minority male	16.8	17.0	17.0	14.8ª	-2.2
Minority female	18.8	11.3ª	19.0	11.1ª	-0.2
Minority	35.6	28.3ª	36.0	25.9ª	-2.4
Asian	9.4	9.4	9.7	7.4ª	-2.0
Black	17.6	13.2ª	17.5	13.0ª	-0.2
Hispanic	7.4	5.7ª	7.6	5.6ª	-0.1
Small ERI Groups	1.2	0.0ª	1.3	0.0ª	-
White	64.4	71.7	64.0	74.1	+2.4
White male	38.9	52.8	38.7	53.7	+0.9
White female	25.5	18.9ª	25.3	20.4ª	+1.5
Total	3,622	53	3,535	54	

Source: MD-715 workforce data table as of September 30, 2020.

The OCC continued to work on its goals and objectives for leadership development designed to create a systematic and sustainable process for succession management that ensures continuity, development, and diversity of leadership at all levels of the organization. The Leadership Developmental Advisory Board, of which the Executive Director of the OMWI is a member, remained focused on providing leadership, guidance, and governance for agency leadership development efforts. In fiscal 2020, the OCC completed the first phase of its redesign of the succession management process, the Leadership Competency Assessment. The phase identified individual development needs and focused on 14 key leadership competencies. Phase II of the redesign will continue into fiscal year 2021 using feedback from Phase I. The OCC maintained its Leadership Institute, a virtual university that provides the framework, curriculum, and programs for systematically developing the OCC's leadership pipeline, fostering a leadership culture and supporting the career development goals of employees. In fiscal year 2020, the OCC offered a virtual training course titled "Unconscious Bias: From Insight to Action." The OCC also continued to offer the "Women in Leadership" course, designed to build influencing skills for existing and emerging women leaders. In addition, the OCC continued to maintain its Career Development Center to provide career coaching, learning events, networking opportunities, individual development planning, mentoring, workshops, and related resources to OCC employees to assist them in reaching their full potential while maximizing their contributions to the agency. The OCC also continued to sponsor the Leadership Institute Speaker's Series and

^a EEO groups participated at rates below their workforce participation rates.

hold informational Manager Forums to educate managers on various leadership development topics.

The OCC's Executive Coaching Program continued to help leaders align vision, actions, and performance and address tactical issues and strategic long-term opportunities. In fiscal year 2020, females and minorities in SLP participated in the OCC Executive Coaching Program at 33.3 percent and 33.3 percent, respectively.

In fiscal year 2021, the OCC will continue to redesign its succession planning program to include a new, competency-based enterprise-wide process, with greater transparency and employee input.

Workforce Environment

Agency Commitment

The Comptroller supervises all D&I matters through the Executive Director for the OMWI. The alignment of the OMWI as a direct report to the Comptroller demonstrates the highest level of commitment from agency leadership and provides direct access to the Comptroller, achieved by regularly scheduled meetings between the OMWI Executive Director and the Comptroller. D&I topical issues are reviewed with the Human Capital (HC) Subcommittee of the Executive Committee. In addition, individual business unit meetings and reviews foster executive support and commitment for the D&I Program.

The OMWI Executive Director continues to collaborate with the senior leadership team in the Office of Management when D&I concerns are discussed as part of the agency's operations management and HC plans and initiatives. Such collaboration allows for a more robust exchange of ideas on matters with overarching agency implications. The OMWI and HC offices have a strong partnership to support and address the agency's HC needs and challenges.

Diversity briefings are held with senior leadership teams to discuss their departmental workforce trends and areas of special attention, including targeted recruitment, retention strategies, and succession planning. One-on-one D&I discussions are held with senior managers when needed or requested. These reviews have facilitated the integration of the principles of the OCC's D&I plans and reports into business unit plans.

The OCC benefits greatly from the input of its eight ENGs that advance D&I in the agency: the Network of Asian Pacific Americans (NAPA); the Coalition of African American Regulatory Employees (CARE); PRIDE (the Lesbian, Gay, Bisexual, and Transgender Employees network group); HOLA; TWN; Generational Crossroads (Crossroads); the Veterans Employee Network (VEN); and the agency's newly launched disability-related ENG, DAWN (Differently Abled Workforce Network). The ENGs serve as a collective voice in communicating workplace concerns and providing input to management around D&I programs and activities within the OCC. The annual ENG leadership forum with the Comptroller, Executive Committee sponsors, and other key agency stakeholders serves to align individual group objectives with agency strategic priorities, particularly pertaining to recruitment, career development, and retention.

ENG officers engage in quarterly teleconference meetings to discuss progress of key initiatives and share best practices across groups. For additional information about the OCC's ENGs, refer to appendix O.

Career Development

Table 12: OCC Career Development Training, Five-Year Trend

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2016	1,506	59.6	40.4	7.2	14.9	8.6	1.0	68.3
FY 2017	2,068	57.5	42.5	7.4	14.4	7.0	1.3	70.0
FY 2018	2,508	56.2	43.8	7.7	16.4	8.0	1.3	66.6
FY 2019	2,169	55.8	44.2	9.0	18.1	8.2	1.2	63.6
FY 2020	1,255	50.4	49.6	6.5	18.6	7.9	1.3	65.8
Average OCC workforce participation rate		55.2	44.8	9.0	17.6	7.2	1.3	64.9

Source: OCC TLMS Data Mart as of September 30, 2020.

The OCC offered more than 59 career development training courses this fiscal year for employees to acquire the competencies, skills, and knowledge for their continual learning and career development. In fiscal year 2020, 1,255 employees participated in these courses with the following training participation rates: females, 49.6 percent; Blacks, 18.6 percent; Hispanics, 7.9 percent; Asians, 6.5 percent; and persons of Small ERI groups, 1.3 percent (see table 12). In addition to skills training, 3,726 employees received diversity and EEO training, not including the No FEAR Act training required every two years (see table 13).

Table 13: OCC Diversity and EEO Training, Five-Year Trend

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2016	1,364	52.6	47.4	6.5	16.7	7.8	0.9	68.2
FY 2017	2,020a	51.8	48.2	7.2	16.6	6.8	1.1	68.1
FY 2018	2,225	55.9	44.1	7.4	16.2	7.6	1.3	67.5
FY 2019	3,877	55.3	44.8	9.2	17.4	7.5	1.3	64.6
FY 2020	3,726	56.0	44.0	9.5	17.3	7.5	1.3	64.5
Average OCC workforce participation rate		55.2	44.8	9.0	17.6	7.2	1.3	64.9

Source: OCC TLMS Data Mart as of September 30, 2020.

Note: Participation in Diversity Dialogues not included in the diversity and EEO training.

^a More than 15 courses were added to the list of diversity and EEO training courses participants took during FY 2017.

Additionally, the OCC offered 18 leadership courses to prepare employees for formal leadership opportunities or to enhance current leadership capabilities. In fiscal year 2020, 511 employees participated in the leadership courses with participation rates as follows: females, 57.1 percent; Blacks, 20.4 percent; Hispanics, 7.2 percent; Asians, 6.7 percent; and persons of Small ERI groups, 2.0 percent (see table 14).

Table 14: OCC Leadership Training, Five-Year Trend

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	Total	Male	Female	Asian	Black	Hispanic	Small ERI groups	White
FY 2016	971	50.6	49.4	7.7	13.7	8.3	1.3	68.9
FY 2017	1,423	50.2	49.7	7.7	16.6	7.1	1.1	67.5
FY 2018	1,809	55.8	44.2	7.8	16.5	7.4	1.4	66.8
FY 2019	1,422	53.5	46.6	9.8	20.0	7.5	1.1	61.7
FY 2020	511	42.9	57.1	6.7	20.4	7.2	2.0	64.0
Average OCC workforce participation rate		55.2	44.8	9.0	17.6	7.2	1.3	64.9

Source: OCC TLMS Data Mart as of September 30, 2020.

In fiscal year 2020, the OCC continued to sponsor LEAD, an enterprise-wide leadership development program targeted to employees at the NB V to NB VI.2 levels. The LEAD Program is an 18- to 24-month program designed to build leadership competencies for aspiring team leaders and managers and to foster broader, enterprise perspectives for participants. The LEAD Program supports the OCC's retention goals by strengthening leadership capabilities and providing career development for aspiring leaders. In fiscal year 2020, selections were made for the LEAD Cohort II Program. Of the 26 selectees, 46.2 percent (12) were female, 19.2 percent (5) were Asian, 19.2 percent (5) were Black, and 11.5 percent (3) were Hispanic. All EEO groups mentioned were selected at rates above their relevant workforce participation rates.

In fiscal year 2020, OCC managers participated in eight agency-sponsored Manager Forums through audio/video/phone conferences on various topics of interest. The OCC continued to utilize online its Individual Development Plan (IDP) tool to support career discussions. The agency also offered the "Career Development Conversations" course to help facilitate those career discussions between employees and managers.

The OCC continued to use its Opportunities Board SharePoint site, which has been the intranet vehicle to announce and market career developmental opportunities. The agency also has a more comprehensive Employment and Opportunities intranet web page to advertise, solicit, and provide information on various employment and career development opportunities throughout the agency.

The OCC maintained its Mentoring web page, providing information on all of the agency's options for mentoring. The Mentoring Resource Toolkit web page and the OCC's ENGs provide

additional resources for mentoring in the agency. The OCC has continued its workplan to launch a formalized Mentoring Program through the Integrated Talented Management System in fiscal year 2021. In addition to an open request for mentors, the OCC will partner with all ENGs to solicit mentors for the agency's mentoring program.

In fiscal year 2020, the Comptroller's initiative for the High School Scholars Internship Program (HSSIP) was expanded to provide a six-week paid internship for 115 students to explore a variety of career paths at the OCC, gain an understanding of the financial services industry, and engage in enrichment activities on financial literacy and leadership fundamentals. Despite the challenges of the COVID-19 pandemic, and as many other agencies cancelled their summer programs, the OCC converted its program to a virtual experience to enable the agency to continue to provide interns with a positive, enriching experience.

The HSSIP served as a way for the agency to connect with and give back to the community, as well as partner with an organization that focused on developing opportunities to place talented young minorities and women in industry internships and summer employment. Additionally, this program introduces and prepares high school students from under-represented populations to potential career opportunities in the financial services industry. The OCC joined with the District of Columbia Department of Employment Services under the Mayor Marion S. Barry Summer Youth Employment Program to identify potential HSSIP participants.

In fiscal year 2021, the OCC will hire over 80 interns, including nine returning interns from the 2020 program and five students from the inaugural program who are currently college students. The OCC's HSSIP Program will partner with the NCUA and the SEC in their high school intern programs.

In fiscal year 2020, the OCC sponsored a joint webcast with the other federal financial regulatory agencies' OMWI offices entitled "Beyond Words: Race, Work and Allyship—Amid the George Floyd Tragedy" to help support conversations around social justice and foster a better understanding across cultural groups and create a more inclusive work environment.

Employee Engagement

The OCC maintained its commitment to promote employee engagement and ensure the OCC continues to be a great place to work. To measure engagement and employees' perceptions of workplace conditions, the OCC continued to use the Office of Personnel Management (OPM)-administered Federal Employee Viewpoint Survey (FEVS) and created an agency-level Engagement Action Plan. The FEVS topics include direct supervision, work unit, leadership, agency, diversity, performance management, recognition, pay, work-life balance, and training and development. The action plan had three key objectives: (1) employee recognition; (2) change capability; and (3) trust in executive leadership.

In 2020, the OPM postponed the FEVS administration due to the COVID-19 pandemic. On July 9, the OPM delayed the FEVS to start the week of September 14, 2020. The number of core items administered in 2020 was reduced from 72 to 38 and over 20 COVID-19 items were added to assess agencies' response to the pandemic. The results of the survey were shared with

agencies in late January 2021. The OCC's Employee Engagement Index increased from 72 percent in 2019 to 78 percent in 2020. The Global Satisfaction Index also increased from 69 percent in 2019 to 76 percent in 2020. The results for the New Inclusion Quotient are not available because the shortened survey did not include all the items that make up the index. The Partnership for Public Service uses a proprietary formula to analyze data from the FEVS to create "The Best Places to Work in the Federal Government" rankings. These rankings are also delayed.

Regulated Entities

The OCC is the prudential federal financial regulator for 1,220 institutions, composed of 858 national banks, 305 federal savings associations, and 57 federal branches of foreign banks. The combined assets held in OCC-regulated institutions are \$12.8 trillion and represent 67.0 percent of total U.S. commercial banking assets.

In accordance with the requirements of the Dodd–Frank Act, the OCC's OMWI Executive Director and directors of other federal financial agency OMWIs published an Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies (Joint Standards). The Joint Standards provide a framework and guidance to enable institutions to voluntarily conduct assessments of their D&I policies and practices in these key areas:

- Organizational commitment to diversity and inclusion
- Workforce profile and employment practices
- Procurement and business practices supplier diversity
- Practices to promote transparency of organizational diversity and inclusion
- Entities' self-assessment processes

In January 2020, the OCC's OMWI received approval from the Office of Management and Budget (OMB) for renewal of its Diversity Self-Assessment template as a tool to assist institutions in their self-assessments and provide a method for collection of that information. As was allowed previously, institutions may use the template or their own tool to submit information on their diversity and inclusion efforts.

Annually, the OCC's OMWI corresponds with the chief executive officers (CEO) of financial institutions with 100 or more employees to encourage submissions of their diversity self-assessments. For 2019, OMWI identified 367 OCC-regulated institutions from which to request diversity self-assessments. To prevent duplicative requests, the OCC removed 142 institutions that were affiliates of holding companies and that received request letters from the Federal Reserve Board (Board). The OCC sent letters to 225 CEOs of its financial institutions and obtained copies of relevant diversity self-assessments that were submitted to the Board. However, given institutions' attention to the overriding priorities and concerns of the COVID-19 pandemic, the request for voluntary year-end 2019 diversity self-assessments was suspended in March 2020 and the timeframe for submissions extended to October 2020. Final submissions of 2019 year-end diversity data from institutions was notably low as a result of the focus on the pandemic.

The response rates to the OCC for the four-year 2016–2019 period are provided below:

Table 15: Comparative Annual Response from OCC-Regulated Institutions

	2016	2017	2018	2019
Institutions contacted	382	378	211	225
Total submissions	56	35	41	22
Response rates	14.7%	9.3%	19.4%	9.8%

Note: The decline in responding institutions for 2019 is attributed to a focus on COVID-19 priorities.

As noted within the Joint Standards, the OMWI may utilize diversity information submitted by institutions to identify leading diversity and inclusion practices. A review of the four-year collection of diversity self-assessments in the key areas identified in the Joint Standards discloses the following information and leading practices:

• Over the four-year period, over 80 percent of responding institutions continued to reflect strong commitments to D&I by including considerations for D&I in their banks' strategic plans; designating senior level officials with relevant knowledge to oversee D&I efforts; and taking proactive steps to foster a pool of diverse candidates for senior leadership and board positions. Improvements were noted across institutions as it relates to developing board-approved D&I policies; providing periodic D&I reports to senior leadership and boards; and conducting training and providing D&I educational opportunities.

Leading practice: In a demonstration of its commitment to D&I, an institution shared that the creation of an executive level D&I Council, composed of senior leadership from each line of business, provides an increased focus on and accountability for the achievement of specific D&I goals.

• In the assessment of workforce profiles and employment practices, all institutions reported that they consistently implement D&I workforce policies and practices to ensure compliance with applicable laws; take steps to ensure equal employment opportunities for all employees and job applicants; and prohibit unlawful employment discrimination. The most notable improvement was apparent in efforts undertaken by institutions to create diverse applicant pools for internal and external employment and promotional opportunities.

Leading practice: A bank noted its development and implementation of several programs specifically targeted to engage in early outreach to minority students as well as an extensive network of partnerships with professional diversity organizations to increase sourcing for diverse applicant pools for management positions within the institution.

• The area of procurement and supplier diversity remains a challenge for reporting institutions. A trend of inconsistent diversity data over the four-year period persists for this function. The number of banks that indicate the existence of supplier diversity policies and/or designated officers remains low. The number of responses from institutions declines even more significantly as it relates to reporting on practices to promote a diverse supplier diversity pool

or metrics to evaluate procurement spending with minority and women-owned contractors and subcontractors. The lack of data provided about financial institutions' procurement and supplier diversity functions necessitates greater diligence and concerted efforts to ensure banks are enabling minority- and women-owned businesses fair access to compete for contracting and procurement opportunities.

Leading practice: An institution reported on its successful supplier development initiative, designed to facilitate networking and business opportunities for minority- and women-owned suppliers with majority-owned firms.

• While over 80 percent of 2019 respondents indicate they have undertaken efforts to provide transparency of their diversity and inclusion policies and programs, this area continues to be of concern based on earlier years of low responses from banks. Collectively, less than 50 percent of reporting institutions have previously publicized their diversity and inclusion strategic plans, shared information on mentorship/developmental programs for employees and contractors, or published opportunities to promote diversity, such as forecasts of employment and procurement opportunities. We strongly encourage institutions to enhance their efforts to achieve transparency of their diversity self-assessments and diversity and inclusion programs.

Leading practice: In addition to publicizing its diversity and inclusion programs and progress on its intranet, external website, and in corporate reports, an institution noted its annual participation in benchmarking surveys to further publicize and assess its progress against best-in-class organizations.

In 2019, the OMWI's outreach to bankers consisted of two interagency Diversity and Inclusion Summits and an American Bankers Association (ABA) webinar. The events enabled the OMWI directors opportunities to provide useful information to bankers and directly encourage their submission of diversity self-assessments. Although the COVID-19 pandemic disrupted 2020 plans to engage in broad outreach efforts, the OCC's OMWI Executive Director participated in two one-on-one diversity discussions with the chief diversity officers of two of the OCC's large banks. The OCC is continuing to explore avenues to engage virtually with institutions in 2021.

Financial Literacy

The OCC is one of the 21 federal agencies represented on the U.S. FLEC. In fiscal year 2020, the FLEC focused its activities on providing COVID-19 financial capability resources, including a concerted effort on the distribution of the Economic Impact Payments, which was administered by the Internal Revenue Service. In September 2020, the FLEC released its update of the U.S. National Strategy for Financial Literacy.

The OCC's Community Affairs office commented on the draft FLEC 2020 National Financial Literacy Strategy; coordinated the OCC's responses to the Organization for Economic Cooperation and Development's questionnaire on financial consumer protection measures implemented in response to the COVID-19 emergency; and updated the OCC's information on MyMoney.gov. The OCC's Community Affairs staff continued to participate on FLEC working groups that developed action plans involving financial capability, housing counseling, and the military.

OCC leadership and staff also participated in several financial literacy events:

- Former Acting Comptroller Brian Brooks participated in the Operation Hope Global Forum in Atlanta.
- The Community Development Director participated in a FLEC panel at the U.S. Department of Housing and Urban Development's 2020 Housing Counseling Intermediary Conference.
- The OCC added a COVID-19 pandemic-specific section to its bi-monthly Financial Literacy Update. This section included resources from government agencies and community-based organizations.
- The OCC sponsored financial literacy training for approximately 130 high school students as part of its HSSIP (see the "Workforce Diversity and Inclusion in Employment, Career Development" section for more details).
- The Office of External Outreach and Minority Affairs and Community Affairs staff taught several personal money management classes for interns from the Congressional Black Caucus and Congressional Hispanic Caucus.

The OCC issued a news release supporting Earned Income Tax Awareness Day on January 31, 2020. The OCC also provided a message from former Comptroller Joseph Otting supporting America Saves Week on the America Saves website.

Throughout fiscal year 2020, OCC staff participated in the following events:

- American Savings Education Council policy board and partner meetings
- Military Saves quarterly meetings
- Prosperity Now's Prosperity Summit
- BankOn meetings
- Military Financial Readiness Coalition Roundtable
- World Elder Abuse Awareness Day event

The OCC's DCAOs organized and co-sponsored numerous webinars around the country on banks and regulatory response during the COVID-19 pandemic, the goal of which was to share best bank practices and clarify the regulatory treatment of bank activities during, and in response to, the pandemic. The DCAOs also reported 33 activities involving financial literacy or financial inclusion across the country. These included meetings and webinars related to BankOn in Massachusetts, Maryland, Colorado, and Florida; Alliance for Economic Inclusion in Oklahoma; Jump\$tart Coalition in Louisiana; United Way Suncoast on financial stability in Florida; Florida Prosperity Partnership 2020 Virtual Conference; Interagency Financial Wellness in Texas; Interagency Youth Banking and Workforce Development Symposium in Atlanta; Advisory Board service on the Hillsborough County Schools Academy of Finance in Florida; and review of students' capstone presentations at the National Academy Foundation's Academy of Finance in Florida.

The OCC educated its employees on several financial literacy fronts. For example, the OCC provided information about the importance of savings and encouraged employee participation in financial literacy volunteer activities. During America Saves Week in February 2020, the OCC published messages on the benefits of saving. The OCC maintains a list of financial literacy volunteer opportunities that OCC employees may consider.

The OCC produced six issues of the bimonthly <u>Financial Literacy Update</u> e-newsletter, which reports on events, initiatives, and related resources provided by the OCC and other government agencies and organizations.

In addition to the financial literacy activities undertaken in fiscal year 2020, the OCC maintained a variety of financial literacy publications for bankers that are available on www.occ.gov or in hard copy. These publications include the following:

- <u>Interagency "Guidance to Encourage Financial Institutions' Youth Savings Programs and</u> Address Related Frequently Asked Questions"
- Financial Literacy Web Resource Directory, which provides information about financial literacy programs that banks can consider for their Community Reinvestment Act programs. The directory covers a variety of financial literacy and education topics such as asset building programs, BankOn programs, disaster recovery, elder financial exploitation, financial literacy for multilingual populations, military resources, retirement and financial security, the unbanked and underbanked, and youth programs.
- Fact sheets on financial literacy innovative products and services, investment vehicles, and federal government programs and initiatives, such as "<u>Bank Savings Incentive Programs</u>";
 "<u>Individual Development Accounts</u>"; and "<u>Leveraging Earned Income Tax Credits to Reach New Bank Customers."
 </u>
- Community Developments Insights reports on financial capability products, services, and initiatives, including "School-Based Bank Savings Programs: Bringing Financial Education to Students"; "Reaching Minority Markets: Community Bank Strategies"; and "Individual Development Accounts: An Asset Building Product for Lower-Income Consumers."
- Community Developments Investments newsletters on financial literacy topics and innovative bank community development lending and investing practices, such as "Cultivating Community-Based Financial Literacy Initiatives."

Appendixes

Appendix A: OCC Method and Data Sources for Payments and Awards

Payments

The OCC uses the Core Financial System to track all agency expenditures, including contractor payments. The OCC pays contractors within 15 days of receipt of an invoice. Because contractors may submit invoices to the OCC after the close of the fiscal year in which the contract actions were reported to the FPDS-NG, the OCC's total payments to contractors during a given fiscal year may differ from the total award amounts.

Awards

The OCC follows the Federal Acquisition Regulation (FAR) for the procurement of goods and services (48 CFR 1). The FAR defines a contract action as "any oral or written action that results in the purchase, rent, or lease of supplies or equipment, services, or construction using appropriated dollars over the micro-purchase threshold, or modifications to these actions regardless of dollar value. Contract action does not include grants, cooperative agreements, other transactions, real property leases, requisitions from federal stock, training authorizations, or other non-FAR-based transactions" (48 CFR 4.601).

The FPDS-NG website is the central repository of information about federal contracting and contains detailed information on contract awards of more than \$3,500.²⁸ The FAR requires federal contracting offices to submit complete and accurate data on contract actions to the FPDS-NG (48 CFR 4.604(b)(3)).

At the end of each fiscal year, the OMWI queries the FPDS-NG and SAM for (1) OCC awards or "action obligations," which are the net amount of funds obligated or de-obligated for all contract actions entered into the FPDS-NG from October 1 through September 30; and (2) the business owner's socioeconomic category²⁹ for each award.

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²⁸ 48 CFR 2.101.

²⁹ The term "socioeconomic category" identifies certain business ownership characteristics (e.g., WOB, small disadvantaged business, educational institution, and MOB). For more information, see the *FPDS-NG Government User's Manual*, version 1.4, p.135 (June 2013).

Appendix B: OCC Payments, Five-Year Trend

	FY 2016	6	FY 2017		FY 2018		FY 2019		FY 2020	
	#	%	\$	%	\$	%	\$	%	\$	%
Total Payments	154,406,367.63	100.0	166,513,008.73	100.0	158,358,199.34	100.0	140,096,187.98	100.0	147,285,440.33	100.0
Minority-owned or women-owned business totals ^a	60,595,166.63	39.2	68,393,929.32	41.1	68,420,549.88	43.2	57,242,495.30	40.9	53,615,063.57	36.4
Minority-owned	44,556,544.67	28.9	46,689,765.24	28.0	54,371,608.60	34.3	44,293,280.88	31.6	33,302,638.51	22.6
Women-owned	18,969,244.92	12.3	25,311,167.36	15.2	18,368,156.08	11.6	18,837,705.43	13.4	24,512,715.98	16.6 ^b
Both minority-owned and women-owned	2,930,622.96	1.9	3,607,003.28	2.2	4,319,214.80	2.7	5,888,491.01	4.2	4,200,290.92	2.9
Asian American ^c	31,340,346.04	20.3	34,018,365.96	20.4	42,489,253.60	26.8	32,064,366.12	22.9	22,494,545.15	15.3
Black American	5,465,888.45	3.5	2,132,783.78	1.3	1,430,671.88	0.9	1,126,671.20	0.8	1,717,588.80	1.2 ^b
Hispanic American	1,861,755.23	1.2	2,158,839.78	1.3	7,376,655.77	4.7	6,660,328.89	4.8	6,469,899.33	4.4
Native Americand	6,408,654.39	4.2	4,126,555.18	2.5	2,576,249.00	1.6	1,947,483.53	1.4	2,392,577.06	1.6 ^b
Other minority ^e	234,766.53	0.2	4,266,506.44	2.6	498,778.35	0.3	2,494,431.14	1.8	228,028.17	0.2

Source: Core Financial System, FPDS-NG for FY 2016 to FY 2020, and SAM.

^a Payments to businesses that were both minority- and women-owned were counted once in the MWOB total dollars and percentages.

Indicates this demographic group had an increase in payment total percentage for FY 2020 versus the previous fiscal year.

^c "Asian American" means Asian-Pacific Americans (persons with origins from Burma, Thailand, Malaysia, Indonesia, Singapore, Brunei, Japan, China, Taiwan, Laos, Cambodia (Kampuchea), Vietnam, Korea, the Philippines, Republic of Palau, Republic of the Marshall Islands, Federated States of Micronesia, the Commonwealth of the Northern Mariana Islands, Guam, Samoa, Macao, Hong Kong, Fiji, Tonga, Kiribati, Tuvalu, or Nauru) and Subcontinent Asian Americans (persons with origins from India, Pakistan, Bangladesh, Sri Lanka, Bhutan, the Maldives Islands, or Nepal). (See 48 CFR 52.219-1.)

^d "Native American" means American Indians. Eskimos. Aleuts. or Native Hawaiians. (See 48 CFR 52.219-1.)

e "Other minority" means those businesses designating "minority-owned" but not designating Asian American, Black American, Hispanic American, or Native American, (See 48 CFR 52,219-1.)

Appendix C: OCC Awards, Five-Year Trend

	FY 2016		FY 2017	,	FY 2018		FY 2019		FY 2020	
	\$	%	\$	%	\$	%	\$	%	\$	%
Total Awards	140,389,148.70	100.0	180,555,187.04	100.0	147,792,960.80	100.0	135,662,052.42	100.0	147,330,873.53	100.0
Minority-owned or women- owned business totals ^a	39,666,008.71	28.3	59,019,898.37	32.7	65,130,643.88	44.1	55,881,752.46	41.2	50,262,954.75	34.1
Minority-owned	32,441,544.93	23.1	36,330,519.21	20.1	48,613,172.19	32.9	41,042,110.36	30.3	32,582,921.97	22.1
Women-owned	14,433,517.08	10.3	26,358,237.35	14.6	22,299,986.54	15.1	19,075,505.37	14.1	24,273,540.76	16.5
Both minority-owned and women-owned	7,209,053.30	5.1	3,668,858.19	2.0	5,782,514.85	3.9	4,235,863.27	3.1	6,593,507.98	4.5
Asian American ^b	14,734,954.72	10.5	22,988,150.94	12.7	35,369,333.59	23.9	30,244,449.62	22.3	22,057,640.36	15.0
Black American	5,852,331.25	4.2	2,125,961.51	1.2	1,368,869.33	0.9	1,441,380.12	1.1	1,390,976.13	0.9
Hispanic American	2,476,290.78	1.8	7,173,436.90	4.0	8,130,759.13	5.5	6,394,130.89	4.7	6,955,391.26	4.7
Native American ^c	5,862,367.36	4.2	3,837,250.20	2.1	2,162,916.73	1.5	1,882,063.32	1.4	1,983,369.92	1.3
Other minority ^d	4,215,580.31	3.0	190,994.26	0.1	1,581,293.41	1.1	1,080,086.41	0.8	195,544.30	0.1

Source: FPDS-NG for FY 2016 to FY 2020 and SAM.

Note: "Awards" are action obligations—the net amount of funds obligated or de-obligated for all awards and modifications entered into the FPDS-NG system during the fiscal year (October 1 through September 30).

^a Awards to businesses that were both minority- and women-owned were counted once in the MWOB total dollars and percentages.

b "Asian American" means Asian-Pacific Americans (persons with origins from Burma, Thailand, Malaysia, Indonesia, Singapore, Brunei, Japan, China, Taiwan, Laos, Cambodia (Kampuchea), Vietnam, Korea, the Philippines, Republic of Palau, Republic of the Marshall Islands, Federated States of Micronesia, the Commonwealth of the Northern Mariana Islands, Guam, Samoa, Macao, Hong Kong, Fiji, Tonga, Kiribati, Tuvalu, or Nauru) and Subcontinent Asian Americans (persons with origins from India, Pakistan, Bangladesh, Sri Lanka, Bhutan, the Maldives Islands, or Nepal). (See 48 CFR 52.219-1.)

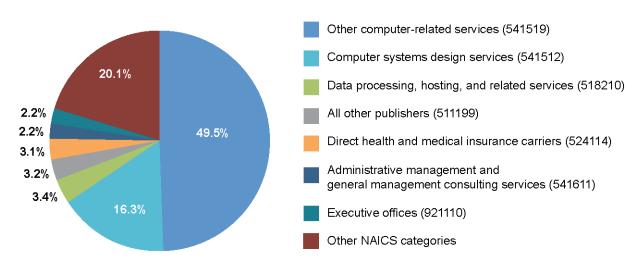
^{° &}quot;Native American" means American Indians, Eskimos, Aleuts, or Native Hawaiians. (See 48 CFR 52.219-1.)

d "Other minority" means those businesses designating "minority-owned" but not designating Asian American, Black American, Hispanic American, or Native American. (See 48 CFR 52.219-1.)

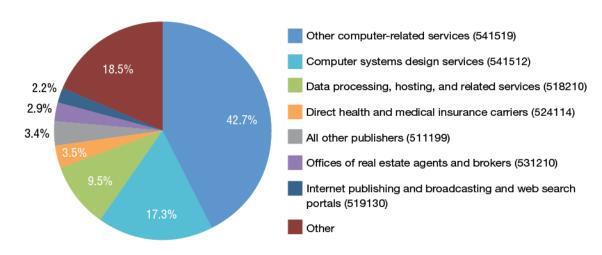
Appendix D: OCC Awards by Top Seven NAICS Codes, Five-Year Trend

Source: FPDS-NG for FY 2016 to FY 2020.

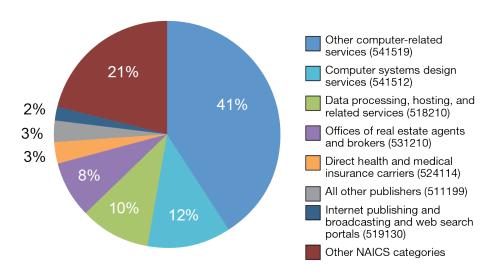
FY 2020: \$147 Million in Total Awards, 79% in Top Seven NAICS



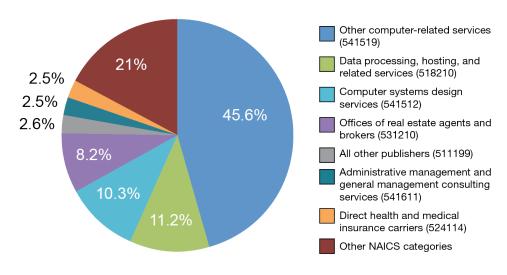
FY 2019: \$136 Million in Total Awards, 82% in Top Seven NAICS



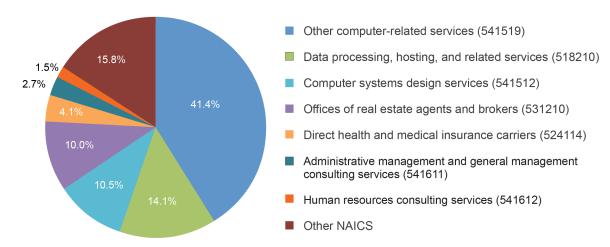
FY 2018: \$148 Million in Total Awards, 79% in Top Seven NAICS



FY 2017: \$181 Million in Total Awards, 83% in Top Seven NAICS



FY 2016: \$154 Million in Total Awards, 84% in Top Seven NAICS



Appendix E: Technical Assistance to MWOBs, FY 2020

OMWI representatives provided technical assistance to MWOBs at the following events:

• National Minority Supplier Development Council Conference and Business Opportunity Exchange, Atlanta

October 14–16, 2019: OMWI exhibited at event with over 6,358 attendees and 756 exhibit booths.

• Connections That Count, OMWI Agencies (Board, CFPB, FDIC, FHFA, NCUA, SEC, and Treasury), Arlington, Va.

December 5, 2019: OMWI agencies developed and hosted technical assistance event with 138 attendees and 8 exhibit booths.

• National 8a Association Small Business Conference, New Orleans

February 11–13, 2020: OMWI exhibited at event with over 1,000 attendees and 100 exhibit booths, participated on panel discussion with 30 attendees, and conducted matchmaking with 12 businesses.

• Partnering to Scale, Minority Business Development Agency, Federal Procurement Center, Houston

February 26, 2020: OMWI exhibited at event with over 100 attendees and 10 exhibit booths, participated on panel discussion with over 100 attendees, and conducted matchmaking sessions.

• Reservation Economic Summit (RES), Las Vegas
March 25–28, 2019: OMWI exhibited at event with 2,184 attendees and 152 exhibit booths.

OMWI representatives also provided technical assistance at the following vendor outreach sessions (VOS) hosted by the Treasury Office of Small and Disadvantaged Business Utilization in Washington, D.C.:

• Treasury VOS

October 22, 2019. Matchmaking sessions.

Appendix F: Awards by Demographic Group in the OCC's Top Seven NAICS Codes, FY 2020

						NAIC	S Codes and I	Descript	ions					
	541519		541512		518210		511199)	524114		541611		921110	
	Other compurelated servi		Computer sys design servi		Data process hosting, and re services		All other publ	ishers	Direct health medical insur carriers		Administrat management general manageme consulting	t and ent	Executive o	ffices
Number of businesses with OCC awards in NAICS	62		10		15		1		1		10		1	
Percentage of total OCC awards	49.5		16.3		3.4		3.2		3.1		2.2		2.2	
Category	\$ Awards	% Awarded	\$ Awards	% Awarded	\$ Awards	% Awarded	\$ Awards % Awarded		\$ Awards	% Awarded	\$ Awards	% Awarded	\$ Awards	% Awarded
Total OCC awards in NAICS	72,931,026.61	49.5	24,020,865.10	16.3	4,988,998.37	3.4	4,646,828.10	3.2	4,600,000.00	3.1	3,273,650.08	2.2	3,241,117.00	2.2
Minority- or women-owned	32,318,695.63	44.3	5,026,794.35	20.9	2,496,012.70	50.0	4,646,828.10	100.0	0.00	0.0	-13,582.48	-0.4	0.00	0.0
Minority-owned	16,852,670.42	23.1	5,026,794.35	20.9	2,496,012.70	50.0	4,646,828.10	100.0	0.00	0.0	-13,582.48	-0.4	0.00	0.0
Women-owned	17,781,944.36	24.4	3,248,087.09	13.5	0.00	0.0	0.00	0.0	0.00	0.0	70,818.52	2.2	0.00	0.0
Asian American	15,102,529.63	20.7	3,592,983.19	15.0	2,580,262.91	51.7	0.00	0.0	0.00	0.0	142,049.52	4.3	0.00	0.0
Black American	38,475.00	0.1	725,615.04	3.0	-84250.21	-1.7	0.00	0.0	0.00	0.0	-143,377.90	-4.4	0.00	0.0
Hispanic American	1,104,579.30	1.5	708,196.12	2.9	0.00	0.0	4,646,828.10	100.0	0.00	0.0	-198,078.60	-6.1	0.00	0.0
Native American	536,190.28	0.7	0.00	0.0	0.00	0.0	0.00	0.0	0.00	0.0	185,824.50	5.7	0.00	0.0
Other minority	70,896.21	0.1	0.00	0.0	0.00	0.0	0.00	0.0	0.00	0.0	0.00	0.0	0.00	0.0

Source: FPDS-NG for FY 2020 and SAM Entity Management Extracts for October 2020.

Appendix G: 2010 Civilian Labor Force

	Male	Female	Asian male	Asian female	Black male	Black female	Hispanic male	Hispanic female	Native Amer. male	Native Amer. female	Native Haw. male	Native Haw. female	2+ races male	2+ races female	White male	White female
2010 NCLF	51.9%	48.1%	2.0%	1.9%	5.5%	6.5%	5.2%	4.8%	0.5%	0.5%	0.1%	0.1%	0.3%	0.3%	38.3%	34.0%
2010 examiner OCLF	54.7%	45.3%	3.7%	4.0%	3.6%	8.7%	3.1%	3.7%	0.1%	0.3%	0.0%	0.0%	0.2%	0.3%	44.1%	28.3%
2010 attorney OCLF	66.7%	33.3%	1.8%	1.8%	2.1%	2.6%	2.5%	1.8%	0.3%	0.2%	0.0%	0.0%	0.2%	0.2%	59.7%	26.7%
2010 economist OCLF	67.1%	32.9%	4.5%	3.1%	2.8%	2.7%	3.3%	1.8%	0.5%	0.1%	0.0%	0.1%	0.2%	0.0%	55.8%	25.2%

Source: MD-715.

Appendix H: OCC Workforce Profile, Five-Year Trend

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	Male	Female	Minority	Asian	Black	Hispanic	Native American	Native Hawaiian	2+ races	White
FY 2016	54.8	45.2 ^a	34.2	8.4	17.6	6.9 ^a	0.9 ^a	0.2	0.3 ^a	65.8 ^a
FY 2017	55.0	45.0ª	34.7	8.6	17.7	7.0ª	0.8ª	0.2	0.4ª	65.4ª
FY 2018	54.9	45.1ª	35.1	9.0	17.6	7.3ª	0.7ª	0.2	0.4ª	64.9ª
FY 2019	55.7	44.3ª	35.6	9.4	17.6	7.4ª	0.7ª	0.2	0.4ª	64.4ª
FY 2020	55.7	44.3ª	36.0	9.7	17.5	7.6ª	0.7ª	0.2	0.4ª	64.0ª
2010 NCLF	51.9	48.1	27.7	3.9	12.0	10.0	1.0	0.2	0.6	72.3
Percentage point change from FY 2016 to FY 2020	+0.9	-0.9	+1.8	+1.3	-0.1	+0.7	-0.2	0.0	+0.1	-1.8

^a EEO groups participating at rates below the 2010 NCLF rates.

Appendix I: OCC Workforce Profile as of September 30, 2020

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	Total	Male	Female	Asian male	Asian female	Black male	Black female	Hispanic male	Hispanic female	Nat. Amer. male	Nat. Amer. female	Nat. Haw. male	Nat. Haw. female	2+ races male	2+ races female	White male	White female
OCC workforce	3,535	55.7	44.3ª	5.7	3.9	6.6	10.8	4.0ª	3.5ª	0.3ª	0.4ª	0.1	0.1	0.1ª	0.3	38.7	25.3ª
2010 NCLF		51.9	48.1	2.0	1.9	5.5	6.5	5.2	4.8	0.5	0.5	0.1	0.1	0.3	0.3	38.3	34.0
Bank examiner	2,349	61.6	38.4ª	4.5	3.1ª	5.5	6.4ª	4.3	3.2ª	0.4	0.4	0.1	0.04	0.2	0.1ª	46.6	25.2ª
2010 bank examiner OCLF		54.7	45.3	3.7	4.0	3.6	8.7	3.1	3.7	0.1	0.3	0.0	0.0	0.2	0.3	44.1	28.3
Attorney	164	51.2ª	48.8	3.7	6.1	1.8ª	3.1	5.5	4.3	0.6	0.0ª	0.0	0.0	0.0ª	0.0ª	39.6ª	35.4
2010 attorney OCLF		66.7	33.3	1.8	1.8	2.1	2.6	2.5	1.8	0.3	0.2	0.0	0.0	0.2	0.2	59.7	26.7
Economist	97	65.0ª	35.1ª	20.6	16.5	3.1	0.0ª	3.1ª	1.0ª	0.0ª	0.0ª	0.0	0.0ª	0.0ª	0.0	38.1ª	17.5ª
2010 economist OCLF		67.1	32.9	4.5	3.1	2.8	2.7	3.3	1.8	0.5	0.1	0.0	0.1	0.2	0.0	55.8	25.2
All other series	925	40.4ª	59.6	7.7	4.4	10.6	24.7	3.1ª	4.7ª	0.1ª	0.4ª	0.2	0.2	0.1ª	0.7	18.6ª	24.5ª
2010 NCLF		51.9	48.1	2.0	1.9	5.5	6.5	5.2	4.8	0.5	0.5	0.1	0.1	0.3	0.3	38.3	34.0

^a EEO groups participating at rates below the 2010 NCLF and OCLF rates.

Appendix J: OCC FY 2020 EEO-1 Report (Occupational Categories Profile) Distribution by ERI and Gender: Permanent Employees

Participation rates of EEO groups are in percentages and rounded up to the decimal.

							Non Hispanic											
Occupational			employe	1		panic		hite		lack		sian	Native F	1		merican		races
categories		All	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
1a. Officials and managers	#	324	194	130	11	8	153	91	15	22	14	9	0	0	1	0	0	0
executive/senior level (grade 15 and above)	%	100.0	59.9	40.1	3.4	2.5	47.2	28.1	4.6	6.8	4.3	2.8	0.0	0.0	0.3	0.0	0.0	0.0
1b. Mid-level	#	305	174	131	12	8	129	91	19	14	13	14	0	0	1	2	0	2
(grades 13-14)	%	100.0	57.1	43.0	3.9	2.6	42.3	29.8	6.2	4.6	4.3	4.6	0.0	0.0	0.3	0.7	0.0	0.7
1. Officials and	#	629	368	261	23	16	282	182	34	36	27	23	0	0	2	2	0	2
managers total	%	100.0	58.5	41.5	3.7	2.5	44.8	28.9	5.4	5.7	4.3	3.7	0.0	0.0	0.3	0.3	0.0	0.3
Category CLF		100.0	56.1	43.9	3.7	3.4	45.7	32.7	3.7	5.1	2.2	1.9	0.1	0.1	0.4	0.4	0.2	0.2
2. Professionals	#	2680	1570	1110	114	91	1078	639	185	255	174	109	4	2	10	10	5	4
2. FIUIESSIUIIAIS	%	100.0	58.6	41.4	4.3	3.4	40.2	23.8	6.9	9.5	6.5	4.1	0.2	0.1	0.4	0.4	0.2	0.2
Category CLF		100.0	45.3	54.7	2.7	3.4	36.0	41.4	3.1	5.5	3.1	3.4	0.0	0.0	0.3	0.5	0.2	0.2
3. Technicians	#	4	4	0	0	0	1	0	3	0	0	0	0	0	0	0	0	0
	%	100.0	100.0	0.0	0.0	0.0	25.0	0.0	75.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Category CLF		100.0	36.8	63.2	3.4	4.7	26.9	45.3	3.6	9.2	2.3	2.9	0.1	0.1	0.4	0.6	0.2	0.4
5. Administrative	#	221	26	195	5	18	7	73	12	92	2	7	0	1	0	1	0	3
support workers	%	100.0	11.8	88.2	2.3	8.1	3.2	33.0	5.4	41.6	0.9	3.2	0.0	0.5	0.0	0.5	0.0	1.4
Category CLF		100.0	24.7	75.3	3.1	7.7	16.5	55.7	3.7	8.6	1.0	2.1	0.0	0.1	0.2	0.8	0.1	0.4
8. Laborers and	#	1	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
helpers	%	100.0	100.0	0.0	0.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Category CLF		100.0	82.0	18.0	12.0	2.1	53.9	12.9	13.0	2.2	1.4	0.3	0.2	0.0	1.2	0.3	0.5	0.1
T	#	3535	1969	1566	142	125	1369	894	234	383	203	139	4	3	12	13	5	9
Total workforce	%	100.0	55.7	44.3	4.0	3.5	38.7	25.3	6.6	10.8	5.7	3.9	0.1	0.1	0.3	0.4	0.1	0.3

Appendix K: Hispanic Female Profile by Occupation Positions, Five-Year Trend

Participation rates of Hispanic females are in percentages and rounded up to the decimal.

			FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Bank	Hires	3.7	3.2ª	3.6ª	5.1	1.5ª	4.6
examiner	Separations	2010	2.9 ^b	1.0	2.1	3.1	3.9 ^b
female	OCC wrk. part.	OCLF	2.7ª	2.9ª	3.2ª	3.2ª	3.2ª
	Hires	1.8	0.0ª	0.0ª	0.0ª	0.0ª	0.0ª
Attorney female	Separations	2010	0.0	0.0	0.0	7.7 ^b	0.0
	OCC wrk. part.	OCLF	2.8	2.8	3.4	4.2	4.3
	Hires	1.8	0.0ª	0.0ª	0.0ª	-	0.0ª
Economist female	Separations	2010	0.0	0.0	0.0	0.0	0.0
	OCC wrk. part.	OCLF	1.1ª	1.0ª	1.0ª	1.0ª	1.0ª
All other	Hires	4.8	3.7ª	5.0	1.7ª	12.0	0.0ª
series	Separations	2010	2.9	6.5 ^b	2.5	5.7 ^b	1.7
female	OCC wrk. part.	NCLF	4.8	4.6ª	4.6ª	4.6ª	4.7ª

^a Hispanic female workforce participation (wrk. part.) and hiring rates below the relative 2010 OCLF or NCLF rates.

Hispanic female workforce participation (wik. part.) and filling fales below
 Hispanic female separation rate above their workforce participation rate.
 No hires in this occupation series for fiscal year 2019.

Appendix L: Hispanic Male Profile by Occupation Positions, Five-Year Trend

Participation rates of Hispanic males are in percentages and rounded up to the decimal.

•			FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Bank	Hires	3.1	5.5	7.8	10.2	7.6	3.8
examiner	Separations	2010	5.7 ^b	4.6b	5.9 ^b	5.7 ^b	1.7
male	OCC wrk. part.	OCLF	3.8	4.0	4.1	4.1	4.3
_	Hires	2.5	25.0	0.0ª	0.0ª	0.0ª	0.0ª
Attorney male	Separations	2010	0.0	25.0 ^b	0.0	0.0	0.0
maie	OCC wrk. part.	OCLF	5.1	3.9	4.0	5.3	5.5
	Hires	3.3	7.7	0.0a	0.0a	-	0.0ª
Economist male	Separations	2010	0.0	0.0	0.0	0.0	0.0
	OCC wrk. part.	OCLF	3.3	3.1ª	2.9ª	3.1ª	3.1ª
All other	Hires	5.2	5.6	1.7ª	6.9	0.0ª	9.4
All other series	Separations	2010	2.9	1.3	2.5	2.3	3.4 ^b
male	OCC wrk. part.	NCLF	3.0ª	2.8ª	3.0ª	2.9ª	3.1ª

^a Hispanic male workforce participation (wrk. part.) and hiring rates below the relative 2010 OCLF or NCLF rates.

b Hispanic male separation rate above their workforce participation rate.

⁻ No hires in this occupation series for fiscal year 2019.

Appendix M: OCC Participation in Supervisor Positions by EEO Groups, Five-Year Trend

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	FY 2	.016	FY 2	017	FY 2	2018	FY 2	019	FY 2	2020	
	OCC workforce participation	OCC supervisor participation	Supervisor participation percentage point change FY 2019 to FY 2020								
Male	54.8	62.3	55.0	61.7	54.9	60.5	55.7	62.1	55.7	60.9	-1.2
Female	45.2	37.7ª	45.0	38.3ª	45.1	39.5ª	44.3	38.0ª	44.3	39.1ª	+1.1
Minority male	15.6	12.8ª	16.0	13.3ª	16.2	13.6ª	16.8	14.6ª	17.0	15.3ª	+0.7
Minority female	18.6	11.1ª	18.7	11.9ª	18.9	12.6ª	18.8	12.4ª	19.0	12.9ª	+0.5
Minority	34.2	23.9ª	34.7	25.2ª	35.1	26.2ª	35.6	27.0ª	36.0	28.2ª	+1.2
Asian male	4.7	5.2	4.9	4.9	5.2	5.1ª	5.6	5.0 ^a	5.7	4.4ª	-0.6
Asian female	3.7	2.2ª	3.6	2.7ª	3.8	2.8ª	3.8	3.1ª	3.9	3.3ª	+0.2
Black male	6.7	4.9ª	6.8	4.4ª	6.7	4.7ª	6.8	5.7ª	6.6	5.8ª	+0.1
Black female	10.9	5.9ª	10.9	6.2ª	10.8	6.3ª	10.8	7.2ª	10.8	6.7ª	-0.5
Hispanic male	3.6	2.7ª	3.7	3.2ª	3.8	3.3ª	3.8	3.3ª	4.0	4.7ª	+1.4
Hispanic female	3.2	2.5ª	3.3	2.5ª	3.5	2.8ª	3.5	1.7ª	3.5	2.2ª	+0.5
Small ERI groups male	0.6	0.0ª	0.6	0.7	0.5	0.5	0.5	0.5	0.6	0.4	-0.1
Small ERI groups female	0.7	0.5ª	0.8	0.5ª	0.8	0.7ª	0.7	0.5ª	0.7	0.7ª	+0.2
White	65.8	76.1	65.4	74.8	64.9	73.9	64.4	73.0	64.0	71.8	-1.2
White male	39.2	49.5	39.0	48.4	38.7	47.0	38.9	47.5	38.7	45.6	-1.9
White female	26.6	26.6	26.4	26.4	26.2	26.9	25.5	25.5	25.3	26.2	+0.7
Total	3,958	406	3,930	405	3,823	428	3,622	419	3,535	450	

Source: OCC HR Data Mart as of September 30, 2020.

^a EEO groups participating at rates below their workforce participation rates.

Appendix N: OCC Workforce Profile of NB-VI to NB-VII Feeder Grades and SLP, Five-Year Trend

Participation rates of EEO groups are in percentages and rounded up to the decimal.

	Avg.		(eq	NB VI uiv. GS	14)			(eq	NB VII uiv. GS	15)				NB VIII I) quiv. SL			SLP percentage
	OCC wrk. part. %	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	point change FY 2019 to FY 2020
Male	55.2	59.4	58.7	59.1	59.6	57.3	60.5	59.7	59.8	60.1	58.6	70.7	69.0	67.9	69.8	68.5	-1.3
Female	44.8	40.6ª	41.3ª	40.9ª	40.4ª	42.7ª	39.6ª	40.3ª	40.2ª	39.9ª	41.4ª	29.3ª	31.0ª	32.1ª	30.2ª	31.5ª	+1.3
Minority male	16.3	13.8ª	14.3ª	14.7ª	15.2ª	14.7ª	10.3ª	10.5ª	10.3ª	11.7ª	12.6ª	12.1ª	12.1ª	16.1ª	17.0	14.8ª	-2.2
Minority female	18.8	12.9ª	14.1ª	14.3ª	14.3ª	16.2ª	10.6ª	10.2ª	10.9ª	11.7ª	12.3ª	5.1ª	8.6ª	8.9ª	11.3ª	11.1ª	-0.2
Minority	35.1	26.7ª	28.4ª	29.0ª	29.4ª	30.9ª	20.9ª	20.7a	21.2ª	23.4ª	24.8ª	17.2ª	20.7a	25.0ª	28.3ª	25.9ª	-2.4
Asian male	5.2	4.5ª	4.7ª	4.7ª	5.4	5.5	5.5	5.4	4.7ª	4.2ª	4.6ª	3.5ª	3.5ª	7.1	7.6	5.6	-2.0
Asian female	3.8	4.7	5.1	5.2	4.9	5.1	2.6ª	2.6ª	2.5ª	2.6ª	2.7ª	0.0a	1.7ª	0.0a	1.9ª	1.9ª	-
Black male	6.7	5.2ª	5.5ª	5.5ª	5.5ª	5.2ª	2.6ª	2.2ª	2.8ª	4.2ª	4.3ª	6.9	5.2ª	5.4ª	5.7ª	5.6ª	-0.1
Black female	10.9	5.3ª	5.9ª	5.8ª	5.5ª	7.6ª	5.1a	4.8ª	5.0ª	6.8ª	6.6ª	5.2ª	6.9ª	7.1ª	7.6ª	7.4ª	-0.2
Hispanic male	3.8	3.5ª	3.3ª	4.0	3.8	3.7ª	1.9ª	2.2ª	2.2ª	2.6ª	3.0ª	1.7ª	3.5ª	3.6ª	3.8	3.7ª	-0.1
Hispanic female	3.4	2.2a	2.7ª	2.4ª	3.2ª	2.9ª	2.6ª	2.6ª	3.1ª	2.0ª	2.7ª	0.0a	0.0a	1.8ª	1.9ª	1.9ª	-
Small ERI groups male	0.6	0.7	0.7	0.5ª	0.4ª	0.4ª	0.3ª	0.6	0.6	0.7	0.7	0.0ª	0.0ª	0.0ª	0.0ª	0.0ª	-
Small ERI groups female	0.7	0.7	0.5ª	0.8	0.7	0.6ª	0.3ª	0.3ª	0.3ª	0.3ª	0.3ª	0.0ª	0.0ª	0.0ª	0.0ª	0.0ª	-
White	64.9	73.3	71.5	71.0	70.6	69.1	79.1	79.2	78.8	76.6	75.2	82.7	79.3	75.0	71.7	74.1	+2.4
White male	38.9	45.6	44.4	44.4	44.4	42.6	50.2	49.2	49.5	48.4	46.0	58.6	56.9	51.8	52.8	53.7	+0.9
White female	26.0	27.7	27.1	26.6	26.1	26.5	28.9	30.0	29.3	28.3	29.1	24.1ª	22.4ª	23.2ª	18.9ª	20.4ª	+1.5
Total		1,235	1,209	1,184	1,148	1,229	311	313	321	308	302	58	58	56	53	54	

^a EEO groups participating at rates below their workforce participation rates (wrk. part.).

Appendix O: Employee Network Groups (ENGs)

The OCC supports the formation and operation of ENGs to

- allow employees to come together to discuss workplace issues of concern and recommend potential solutions.
- provide input to senior leadership on matters related to diversity and inclusion in the workplace.
- promote discussion of views relating to the interests of the group that will contribute to enhanced employee engagement, effectiveness, and agency operations.
- provide leadership opportunities to the officers and members.

The OCC recognizes ENGs as a means of building a more productive and respectful work environment for employees. ENGs are groups of employees who form to address workplace issues that are common to members of that group. ENGs are governed by a policy that addresses formation and purpose; roles and responsibilities; funding; and permissible and impermissible activities. Each ENG is required to have a mission statement, bylaws, and purposeful activities and programs. Each ENG has an Executive Committee sponsor who provides guidance, advocacy, and support for the group's activities and programs. The OMWI assists in the formation of new ENGs and provides guidance and support for the groups' activities and programs to ensure alignment with agency initiatives and objectives for a diverse and inclusive workforce.

The OCC greatly benefits from the input of its eight ENGs, which include HOLA, TWN, NAPA, CARE, PRIDE, Crossroads, and the VEN. In fiscal year 2020, the OCC launched a new disability-related ENG, the Differently Abled Workforce Network (DAWN), dedicated to fostering a workplace that values and respects individuals with different abilities. DAWN also serves as a source of support and information for OCC employees and their family members with disabilities.

The ENGs provide their perspectives on diversity and inclusion at the OCC and develop programs and activities to assist in the agency's recruitment, career development, and retention efforts. All of the ENGs are active and integral components of the OCC's diversity and inclusion initiatives. In fiscal year 2020, the membership in ENGs was approximately 2,370, or 66.8 percent of OCC employees.

Appendix P: Abbreviations

ABA American Bankers Association

CARE Coalition of African American Regulatory Employees

CEO Chief executive officer

CFPB Consumer Financial Protection Bureau **CPSD** Certified Professional in Supplier Diversity

Crossroads Generational Crossroads

CSDP Certified Supplier Diversity Professional

D&I Diversity and inclusion

Dodd–Frank Dodd–Frank Wall Street Reform and Consumer Protection Act

EEO Equal employment opportunity
EEO-1 EEOC's Standard Form 100

EEOC Equal Employment Opportunity Commission

ENG Employee network group
ERI Ethnicity and race indicator
FAR Federal Acquisition Regulation

FDIC Federal Deposit Insurance Corporation
FEVS Federal Employee Viewpoint Survey
FHFA Federal Housing Finance Agency

FLEC Financial Literacy and Education Commission FPDS-NG Federal Procurement Data System-Next Generation

HBA Hispanic Barrier Analysis

HC Human Capital Human Resources

HOLA Hispanic Organization for Leadership and Advancement

HSSIP High School Scholars Internship Program

IDP Individual Development Plan

LEAD Leadership Exploration and Development

LBS Large Bank Supervision

MCBS Midsize and Community Bank Supervision

MOB Minority-owned business

MWBEMinority and women owned business enterprisesMWOBMinority-owned or women-owned businessNACENational Association of Colleges and EmployersNAICSNorth American Industry Classification System

NAPA Network of Asian Pacific Americans

NCLF National civilian labor force

NCUA National Credit Union Administration
OCC Office of the Comptroller of the Currency

OCLF Occupational civilian labor force
OMB Office of Management and Budget
OMWI Office of Minority and Women Inclusion

PRIDE Lesbian, gay, bisexual, and transgender employees' network group

RCLF Relevant civilian labor force SAM System for Award Management **SEC** Securities and Exchange Commission

SLP Senior-level position
TWN The Women's Network

UCE
 VEN
 Veterans Employee Network
 WOB
 Women-owned business
 Vos
 Vendor outreach session

