



Pension Benefit
Guaranty Corporation

**Management Directive 715
Annual EEO Program Status Report
Fiscal Year 2020**

**Pension Benefit Guaranty Corporation
 FY 2020 Annual EEO Program Status Report
 Management Directive 715**

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APPENDIX:

Fiscal Year 2020 EEO Workforce Data Tables (Parts A&B)

EEO Policy Statement

EEO Anti-Harassment Policy Statement

PBGC Organization Chart



MD-715 Parts A Through E

Part A - Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code	Agency Code	FIPS Code
Pension Benefit Guaranty Corporation		1200 K Street NW	Washington, DC		20005	BG	11

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	909	43	952

Part C.1 - Head of Agency and Head of Agency Designee

Agency Leadership	Name	Title
Head of Agency	Gordon Hartogenesis	PBGC Director
Head of Agency Designee	N/A	

Part C.2 - Agency Official(s) Responsible for Oversight of EEO Program(s)

EEO Program Staff	Name	Title	Occupational Series	Pay Plan and Grade	Phone Number	Email Address
Principal EEO Director/Official	Brenecia Watson	EEO Director	260	GS-15	202-229-6868	watson.brenecia@pbgc.gov
Affirmative Employment Program Manager	Hope Fuller	Lead EEO Specialist	260	GS-14	202-229-3345	fuller.hope@pbgc.gov
Complaint Processing Program Manager	Dianne Wood	Attorney Advisor	905	GS-14	202-229-3307	wood.dianne@pbgc.gov
Diversity & Inclusion Officer	Karen Esser	Problem Resolution Specialist	301	GS-14	202-229-3275	esser.karen@pbgc.gov
Hispanic Affirmative Employment Committee Chair	Kimberly Rodgers	EEO Specialist	260	GS-11	202-229-3575	rodgers.kimberly@pbgc.gov

EEO Program Staff	Name	Title	Occupational Series	Pay Plan and Grade	Phone Number	Email Address
Women's Affirmative Employment Committee Chair	Beverley Hebron	Management Analyst	343	GS-13	202-229-6237	hebron.beverley@pbgc.gov
Disability Affirmative Employment Committee Chair	Cynthia Searles	EEO Specialist	260	GS-12	202-229-3405	searles.cynthia@pbgc.gov
Disability Program Manager	Denorse Prince	HR Specialist	201	GS-11	202-229-4026	Prince.denorse@pbgc.gov
Reasonable Accommodation Program Manager	Donald Beasley	HR Specialist	201	GS-13	202-229-3637	beasley.donald@pbgc.gov
Anti-Harassment Program Manager	Karen Esser	Problem Resolution Specialist	301	GS-14	202-229-3275	esser.karen@pbgc.gov
ADR Program Manager	Dianne Wood	Attorney Advisor	905	GS-14	202-229-3307	wood.dianne@pbgc.gov
Compliance Manager	Dianne Wood	Attorney Advisor	905	GS-14	202-229-3307	wood.dianne@pbgc.gov
Principal MD-715 Preparer	Hope Fuller	Lead EEO Specialist	260	GS-14	202-229-3345	fuller.hope@pbgc.gov

Part D.1 – List of Subordinate Components Covered in this Report

Please identify the subordinate components within the agency (e.g., bureaus, regions, etc.). If the agency does not have any subordinate components, please check the box.

Subordinate Component	City	State	Country (Optional)	Agency Code	FIPS Codes

Part D.2 – Mandatory and Optional Documents for this Report

In the table below, the agency must submit these documents with its MD-715 report.

Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments
Organizational Chart	YES	
EEO Policy Statement	YES	
Strategic Plan	YES	
Anti-Harassment Policy and Procedures	YES	
Reasonable Accommodation Procedures	YES	
Personal Assistance Services Procedures	YES	
Alternative Dispute Resolution Procedures	YES	

In the table below, the agency may decide whether to submit these documents with its MD-715 report.

Did the agency submit the following optional documents?	Please respond Yes or No	Comments
Federal Equal Opportunity Recruitment Program (FEORP) Report	YES	
Disabled Veterans Affirmative Action Program (DVAAP) Report	YES	
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	YES	
Diversity and Inclusion Plan under Executive Order 13583	YES	
Diversity Policy Statement	YES	
Human Capital Strategic Plan	YES	
EEO Strategic Plan	YES	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	YES	

Pension Benefit Guaranty Corporation

For period covering October 1, 2019 to September 30, 2020

EXECUTIVE SUMMARY

E.1: Mission

The Pension Benefit Guaranty Corporation (Agency) protects the retirement income of over 34 million American workers, retirees, and beneficiaries in both single-employer and multiemployer private sector pension plans. PBGC was created by the Employee Retirement Income Security Act of 1974 to encourage the continuation and maintenance of private sector defined benefit pension plans, provide timely and uninterrupted payment of pension benefits, and keep pension insurance premiums at a minimum. For over 45 years, the PBGC has protected the pension benefits of millions of America's workers and retirees, and it is critical to our nation's retirement security. During FY 2020, PBGC assumed responsibility for 69 single-employer plans that provided benefits to nearly 57,000 participants in newly trustee plans and paid over \$6.1 billion to more than 984,000 retirees.

PBGC promotes full and fair opportunities for employment, career advancement and access to programs so that employees of PBGC are valued, respected and are free to develop their full potential in a culture aligned with the Corporation's priorities. The Office of Equal Employment Opportunity (OEEEO) manages the Agency's Equal Employment Opportunity (EEO) program and follows the Equal Employment Opportunity Commission's (EEOC) regulations and policy.

Management Directive 715 (MD-715) is the policy guidance which the EEOC provides to federal agencies for their use in establishing and maintaining effective programs of equal employment opportunity under Section 717 of Title VII of the Civil Rights Act of 1964 (Title VII), as amended, and Section 501 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended.

MD-715 provides a roadmap for creating effective EEO programs for all federal employees as required by Title VII and the Rehabilitation Act. The stated objective of MD-715 is to ensure that all employees and applicants for employment enjoy equality of opportunity in the federal workplace, regardless of race, sex, national origin, color, religion, disability, or reprisal for engaging in prior protected activity. Additionally, the EEOC seeks to ensure the same opportunities to all groups regardless of age, genetic information, pregnancy, or other prohibited bases.

MD-715 requires agencies to take appropriate steps to ensure that all employment decisions are free from discrimination. It sets forth standards by which the Agency's EEO programs will be reviewed by the EEOC, including, but not limited to, the requirement that agencies conduct periodic self-assessments and barrier analysis to identify and remove barriers which may preclude access to equal employment opportunities in the workplace.

As required by the EEOC, this report was completed utilizing data compiled at the end of FY 2020 and covers the period from October 1, 2019 through September 30, 2020. The workforce data utilized includes permanent employees and was extracted from IBC Datamart Portal through the Interior Business Center of the Department of the Interior.

PBGC's noteworthy progress in FY 2020 in developing an equitable work environment and its plans for enhancing the EEO program are described in the remainder of the document.

The major occupations at PBGC during FY 2020 include Auditor (Series 0511), General Attorney (Series 0905), Actuary (Series 1510), Information Technology Specialist (Series 2210), Accountant (Series 0510), Employee Benefits Law Specialist (Series 0958), Financial Analyst (Series 1160), and Contract Specialist (Series 1102). These occupations represent a significant portion of the PBGC workforce. Planned affirmative employment and outreach efforts include collaborating with management and the Human Resources Department (HRD) on recruitment and retention in these major categories.

Results of the Agency’s Annual Self-Assessment

PBGC conducted its annual self-assessment of the Six Essential Elements as regulated by EEOC’s Management Directive 715 and continues to report steady progress towards model EEO program status. The following chart reflects the percentage met for each essential element of a model EEO program over the past three fiscal years:

Element	FY 2020		FY 2019		FY 2018	
	Number of Deficiencies	Percentage	Number of Deficiencies	Percentage	Number of Deficiencies	Percentage
A - Demonstrated Leadership Commitment	0	100%	0	100%	2	86%
B - Integration of EEO in Strategic Mission	0	100%	0	100%	0	100%
C - Management & Program Accountability	0	100%	0	100%	1	98%
D - Proactive Discrimination Prevention	0	100%	0	100%	0	100%
E - Efficiency	0	100%	1	97%	1	97%
F - Responsive & Legal Compliance	0	100%	0	100%	0	100%
Summary Score		100.0%		99.5%		97%

E.2: Essential Elements A - F

Essential Element A: Demonstrated Commitment from Agency Leadership

- PBGC’s Strategic Plan includes objectives to employ a high performing workforce and to encourage and support a diverse and inclusive work environment that encourages employee engagement.
- The EEO Director met with the Agency Head, Senior Leadership and/or Department Directors to discuss EEO programs and initiatives throughout the year.
- The State of the Agency’s EEO Program briefing was delivered to the Agency Head and Senior Leadership. The presentation was posted to the OEEO’s intranet which is employee accessible.
- Each PBGC organization has created a working relationship with the OEEO by appointing a point of contact from its office to assist with their equal employment opportunity action plans.

Agency leadership supported the following:

- Posting of MD-715 and No FEAR Act Quarterly and Annual Reports on internal and external websites.
- Dissemination of information about PBGC's EEO programs to employees in New Employee Orientations and on the Agency's internal website.
- Dissemination of information about PBGC's Diversity Council and Employee Resource Groups to employees during New Employee Orientation sessions conducted throughout the year.
- Equal opportunity, diversity, and inclusion by partnering with the PBGC Diversity Council to conduct a Senior Leader brown bag series on creating inclusion in a virtual work environment and supporting the various special emphasis observances held throughout the year.
- Agency staff participated in the various Affirmative Employment Committees.
- Establishing a new Employee Resource Group (ERG) for First Generation Professionals (FGPs), who are among the first in their families to attend college or work in a professional work environment and those who wish to support them.

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

- PBGC enhanced collaborative departmental partnerships involving OEEO to support improved integration of EEO, diversity and inclusion principles throughout the Agency's strategic operations in FY 2020.
- Collaboration with HRD in preparation of Federal Equal Opportunity Recruitment Program (FEORP) and Disabled Veterans Affirmative Action Program (DVAAP) for FY 2020.
- PBGC continued barrier and trends analysis (BATA) on key human capital areas, e.g., recruitment and hiring, separations, promotions.
- The Agency developed, conducted, delivered, and participated in virtual trainings on EEO, diversity and inclusion, anti-harassment, reasonable accommodation, and Section 508 Compliance, as well as educationally focused Special Emphasis Program and Disability Awareness observances.

Essential Element C: Management and Program Accountability

- PBGC managers and supervisors are evaluated on their commitment to PBGC's affirmative employment principles, and EEO and Diversity goals.
- Agency policies, procedures, and practices were examined to identify if there were barriers to equal employment opportunity for employees and applicants.
- PBGC has a policy discouraging offensive conduct before it rises to the level of discriminatory harassment. Employees are encouraged to report offensive, unwanted conduct. In FY 2020, the Office of the General Counsel and the Human Resources Department jointly evaluated 12 reports of potential harassment and conducted inquiries as appropriate through the Agency's Harassment Inquiry Committee (HIC).
- PBGC has an annual mandatory reasonable accommodation and diversity and inclusion training requirement for all supervisors and managers and HRD delivered virtual training sessions in these areas in FY 2020. The Agency's Reasonable Accommodations Coordinator briefed all new employees on reasonable accommodation procedures during New Employee Orientation and the Agency's Section 508 Compliance Team conducted training sessions throughout the year available to all employees

Essential Element D: Proactive Prevention of Unlawful Discrimination

- PBGC provided managers, supervisors, and employees with information regarding their rights and responsibilities under various anti-discrimination and anti-retaliation laws through posters, intranet content, all-employee emails, and policy statements.
- The Agency conducted virtual trainings for PBGC managers and staff in the areas of EEO, Diversity, Inclusion, anti-harassment, reasonable accommodation, and section 508 Compliance.
- Agency organizations supported the EEO program in identifying and/or correcting potential barriers to equal employment opportunity and supported EEO-related committees and projects.

-

Essential Element E: Efficiency

- The Agency offers early resolution of complaints with the use of alternative dispute resolution (ADR) as an option to its traditional administrative EEO process. The commitment to ADR is communicated to employees through the intranet, training, and during individual meetings with parties seeking assistance from OEEEO.
- For FY 2020, ADR was offered to 1 individual and it was denied. Participation in ADR was impacted by the restrictions outlined in Executive Order 13839 issued May 2018. The Executive Order prohibited granting frequent remedies sought in mediation.
- PBGC received and processed 11 formal complaints alleging employment discrimination in FY 2020.

Essential Element F: Responsiveness and Legal Compliance

- Annual Federal EEO Statistical Report on Discrimination Complaints (EEOC Form 462) and Annual Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (NO FEAR) report were submitted in advance of established timeframes.
- The Agency successfully processed 95 percent of informal complaints within regulatory time frames.
- The following reflects PBGC's formal complaints activity in FY 2020:
- By the end of the fiscal year, the Agency had 23 formal complaints in inventory:
 - 12 formal complaints were on hand from FY2019
 - 11 formal complaints were filed in FY 2020
 - 0 formal complaints were remanded from the EEOC
 - 9 formal complaints were closed
- Of the 23 formal complaints on hand at the end of the fiscal year:
 - 0 pending letter of acknowledgement
 - 2 pending accept/dismiss
 - 9 investigations completed within regulatory timeframes; average number of days to complete investigations was 112
 - 1 investigation with amendment was completed in 217 days which is within the 181-360 day regulatory timeframes for amendments.
 - 10 cases pending hearing before EEOC
 - 1 case pending investigation.
 - 0 pending final agency decisions

E.4 – E.5: PBGC’s Accomplishments and Ongoing Commitment to a Model EEO Program

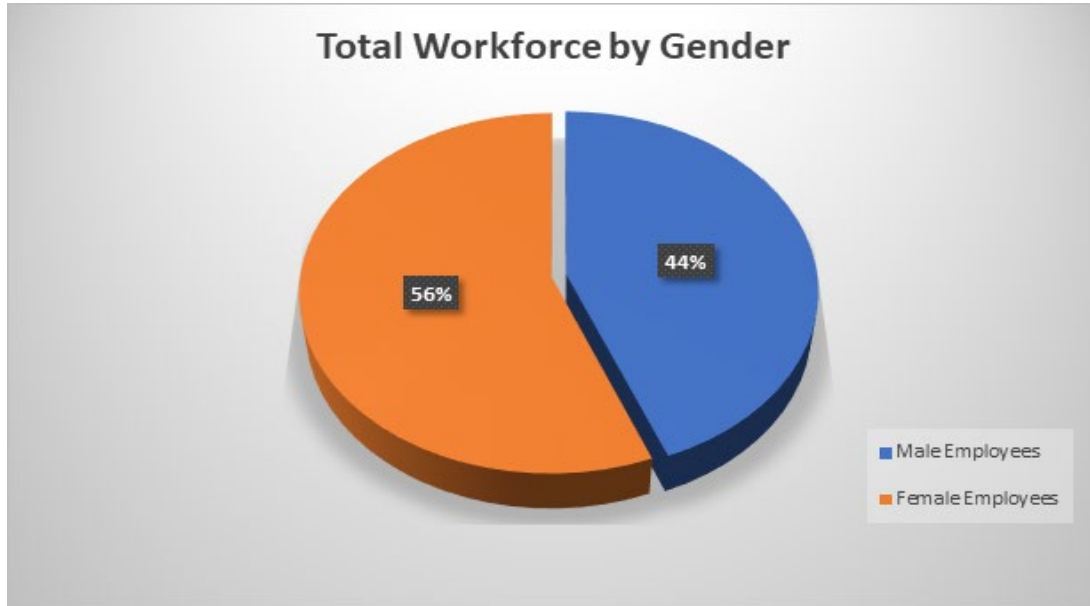
- PBGC’s senior leadership team, including its Director, demonstrates its commitment to moving the Agency to model EEO program status via support of barrier analysis and annual EEO training.
- OEEEO offered Supervisory EEO training and EEO Employee training and will review and establish a schedule for ongoing EEO training courses for both current and new managers and supervisors.
- The Human Resources Department continued to offer a comprehensive leadership development training program for managers and supervisors with courses focused on diversity, inclusion, and unconscious bias, as well as a Leadership/Executive Coaching Program with International Coaching Federation (ICF) certified coaches available to employees at the SL, GS-15, and GS-14 grade levels.
- Agency senior leaders have provided continued support for barrier analysis by providing organizational points of contact to work with OEEEO so that equal opportunity and diversity and inclusion are integrated into the Agency’s strategic operations. The goal is to be proactive in the prevention of discrimination.
- OEEEO will continue to engage senior leaders, human resources staff and hiring officials to examine ways to improve recruitment and retention and discuss process improvement to determine whether the recruitment and selection process should be refined internally.
- OEEEO continued its book club with discussions focused on topics that support equity, diversity, and inclusion to create a more engaged workforce.
- OEEEO continued its YOUiversity bias awareness program.
- PBGC’s Affirmative Employment Committees assisted in barrier analysis program development to support equal employment opportunity.
- PBGC’s Diversity and Inclusion Council (D & I Council) provided “Be an Inclusion Agent” training to managers, supervisors, and employees.
- In FY 2020, the D & I Council formed a new employee resource group at PBGC for First Generation Professionals (FGPs).
- The D & I Council developed and sponsored a Senior leader “Brown Bag” Series on Creating Inclusion in A Virtual Work Environment where Senior Leaders shared strategies for creating inclusion and enhancing teamwork and collaboration in a virtual work environment.
- PBGC’s Section 508 Compliance Team continued to conduct multiple virtual “Acclimate to Section 508” Learning Series courses throughout the year.
- Office of General Counsel (OGC) continued to focus its recruitment efforts on increasing the representation of minority attorneys in OGC. Targeted recruitment activities resulted in OGC hiring 15 new attorneys. Of that number, seven were Asian, Black, or Hispanic.
- Office of Policy and External Affairs (OPEA) began working to develop targeted recruitment strategies for underrepresented groups.
- Office of Management and Administration (OMA) enhanced developmental opportunities by establishing career ladder positions at lower grade levels that are promotable to higher GS-levels.
- Office of Benefits Administration (OBA) continued to work with the HRD on a workforce planning strategy that will allow the recruitment of new hires at lower grades with career ladders to GS12 or GS13. Additionally, OBA continued to seek opportunities to expand the use of the Hispanic Association of Colleges and Universities (HACU) program to multiple semesters and to recruit students for permanent positions.
- Office of Information Technology (OIT) worked with the Human Resources Department to develop recruitment strategies targeted at underrepresented groups.

- Office of The Chief Financial Officer (OCFO) continued to work with the Human Resources Department (HRD) to hire persons with targeted disabilities through Schedule A appointing authority.

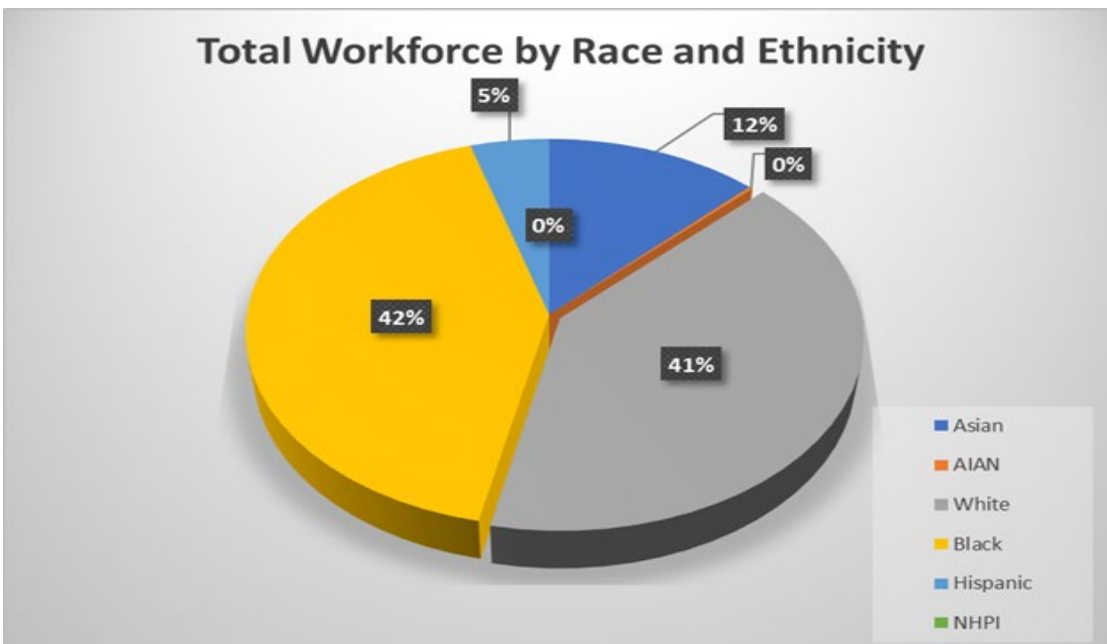
E.3: Workforce Analysis

2020 Total Workforce - Review

During the reporting period PBGC had a total of 952 employees. Females represented 56% of the workforce and males represented 44%. The representation rates of both demographics remained consistent with the prior year percentages.

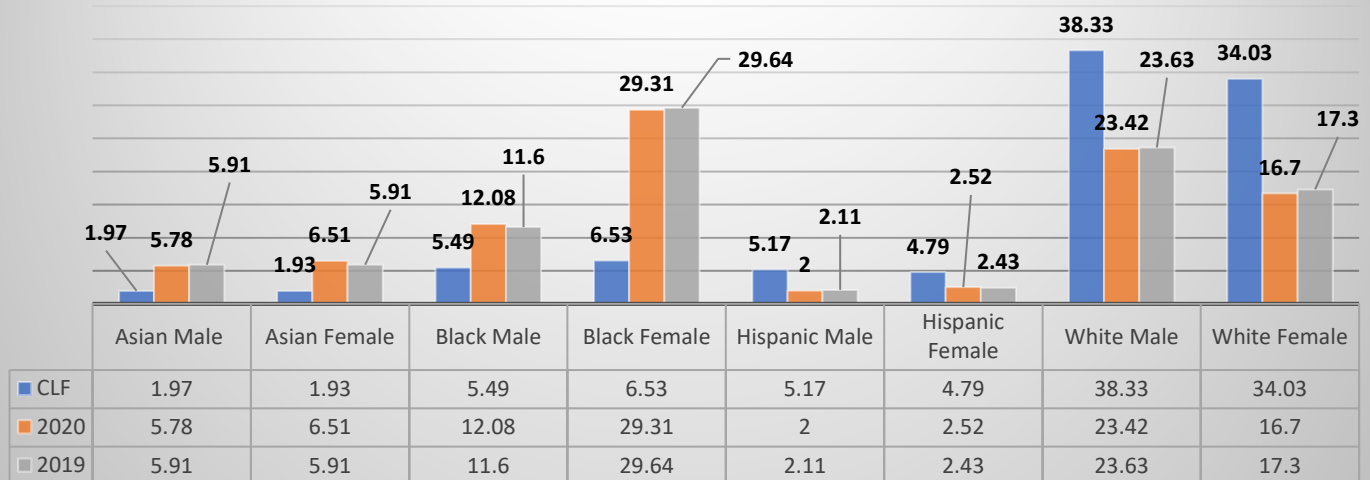


When comparing groups by race and ethnicity to the Civilian Labor Force (CLF) benchmark, it should be noted that there is a lack of representation in PBGC for Native Hawaiian or Other Pacific Islanders. American Indian or Alaskan Natives are below representation and Two-or-More Races has increased since the previous year. Asian, Hispanic, and White representation has remained consistent, and Black representation has decreased but remains above the civilian labor force benchmark.



OEE0 conducted its annual review to identify significant changes and/or inconsistencies in the representation rates by Race, Ethnicity and Gender of PBGC's workforce in comparison to the Civilian Labor Force benchmark. While the workforce demographic remains consistent amongst most groups, it should be noted that both Hispanic and White representation rates are consistently below the civilian labor force benchmark. The changes are reflected on the table below.

PBGC Representation by Race, Ethnicity, & Gender From FY 2019 to FY 2020



The benchmark for grade representation is the total workforce. All demographics that are below the benchmark are reflected in red. When reviewing PBGC's grade representation, we identified that Black males and Asian, Black, and Hispanic females are below the benchmark for their representation in grades GS-14 thru SL. Asian males are below the benchmark in SL representation, and Hispanic males are below the benchmark for grades GS-15 and SL.

These rates are reflected in the following chart.

FY2020	Benchmark %	GS-9 %	GS-11 %	GS-12 %	GS-13 %	GS-14 %	GS-15 %	SL %
Asian Male	5.78	8.70	4.55	5.88	7.08	5.52	5.52	2.50
Asian Female	6.51	4.35	6.82	8.24	7.96	5.84	6.21	2.50
Black/African American Male	12.08	8.70	11.36	15.29	14.16	11.69	8.97	7.50
Black/African American Female	29.31	43.48	47.73	44.71	37.17	21.43	15.86	10.00
Hispanic Male	16.70	0.00	2.27	2.35	2.21	1.62	1.38	0.00
Hispanic Female	2.00	4.35	4.55	5.88	2.65	1.30	2.07	0.00
White Male	23.42	8.33	6.82	7.02	16.52	30.97	33.33	46.34
White Female	16.70	20.83	6.82	10.59	9.38	20.65	27.08	31.71

In reviewing FY 2020 data to identify significant changes in occupation representation rates of PBGC's eight major occupations by race, ethnicity, and gender, we noted that in comparison to the FY 2019 PBGC data regarding the Accounting 0510 Series, Hispanic males and females continue to be conspicuously

absent from the series. Asian male representation rates had a decrease and Black females had an increase. It should be noted that both Asian males and Black females are above the Occupational Civilian Labor Force (OCLF) benchmark rate of representation. These changes are reflected in Table 1.

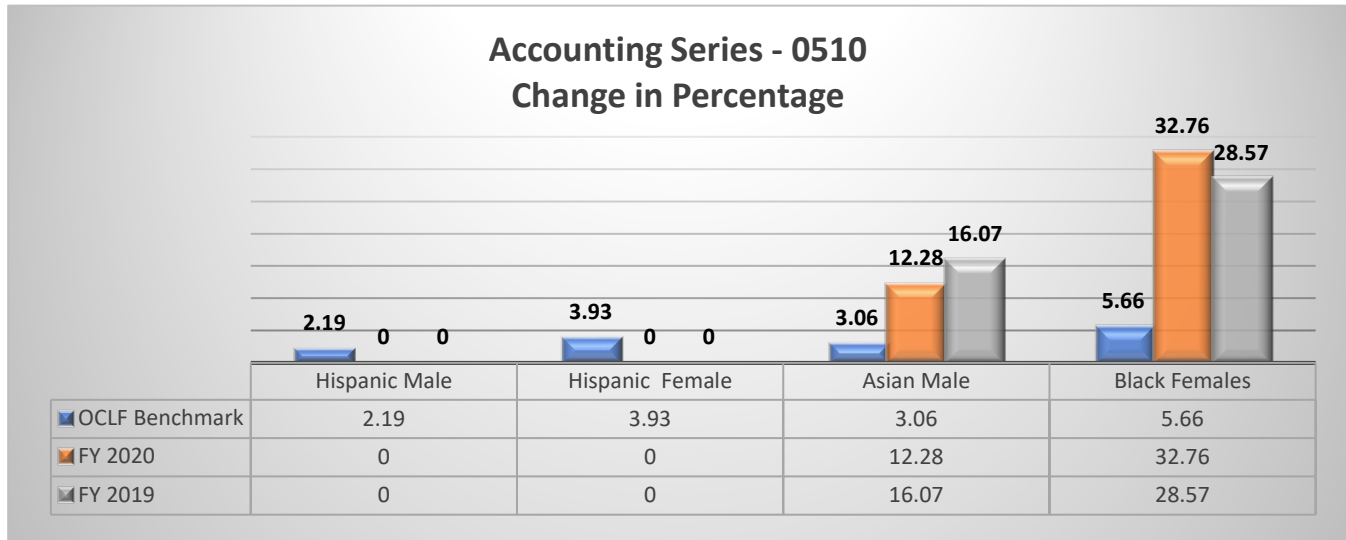


Table 1.

It should be noted that throughout this section of the report, if there is no reference made to a specific race, ethnicity, or gender, that demographic is either at or above parity with the benchmark. In the FY 2020 data for Auditing 0511 series, White males and females are below the OCLF, however both experienced an increase in representation rate. Black females also had a decrease in representation rate over the 2-year reporting period, however, remain above the OCLF. These changes are reflected in Table 2.

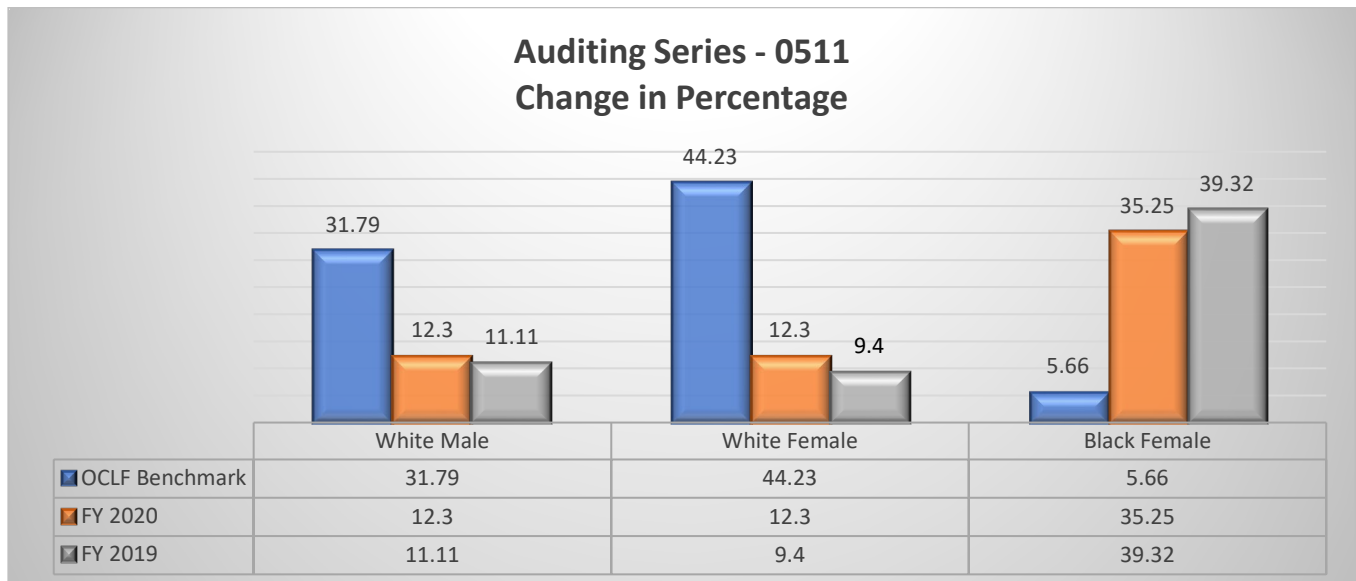


Table 2.

In FY 2020 PBGC's General Attorney 0905 Series reflected that the representation rate of Hispanic males had decreased by 2.05% and that Asian and Black males continue to be absent from the series. These changes are also reflected in Table 3.

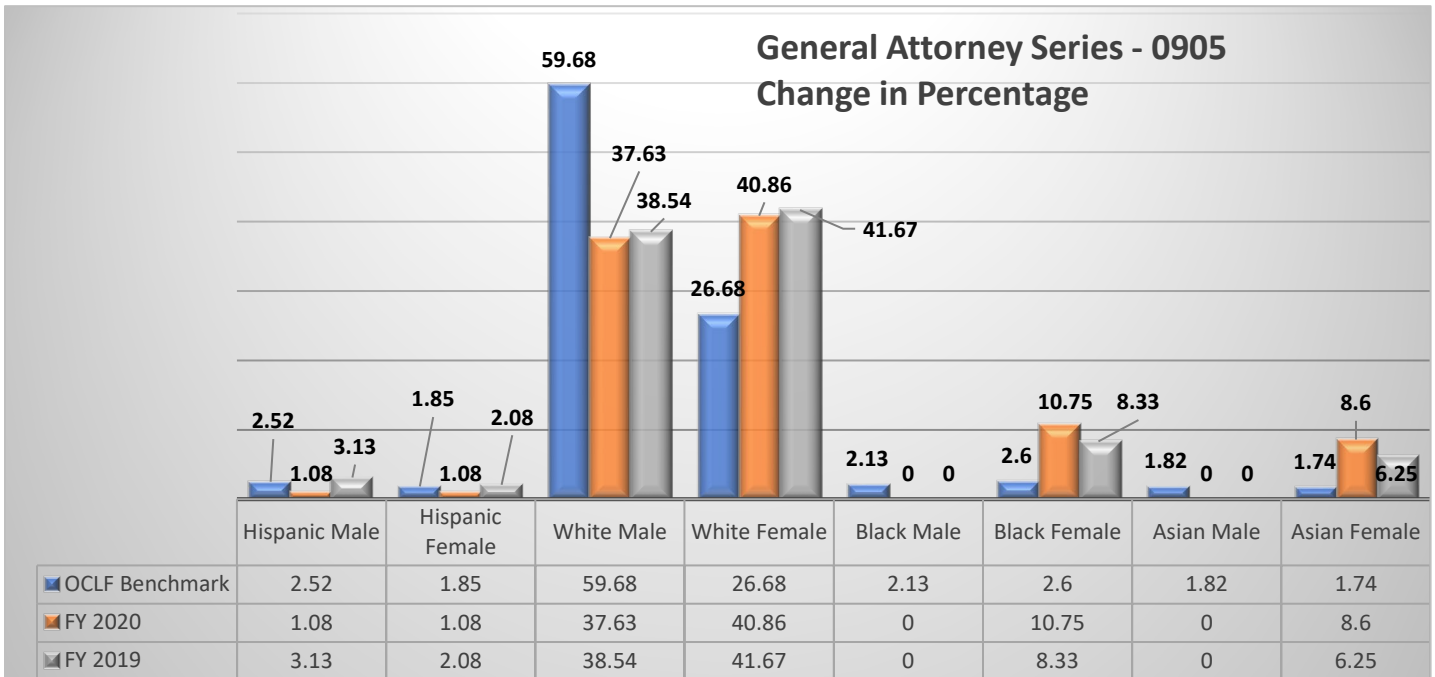


Table 3.

Employee Benefits Law 0958 Series reflects that the representation rates of White males had a decrease in representation, and Hispanic males, Hispanic and Asian female representation rates increased from previous years numbers. These changes are also reflected in Table 4.

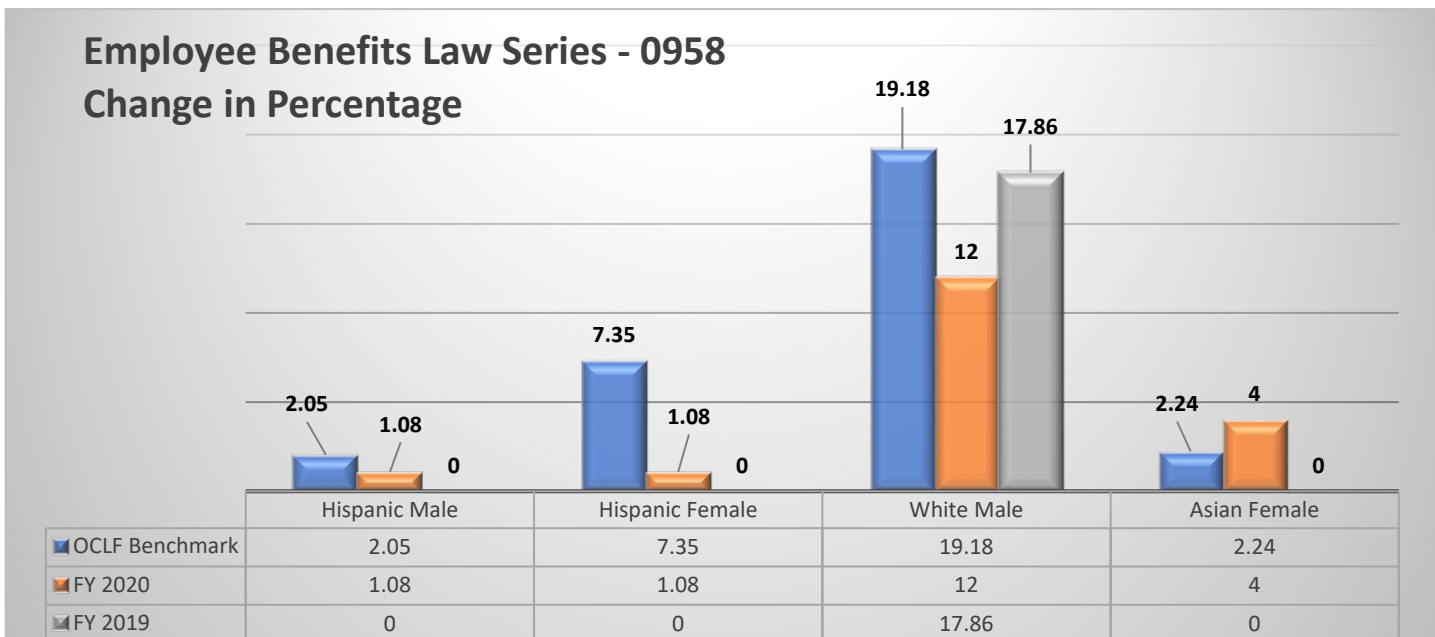


Table 4.

When reviewing the Contracting 1102 Series, it reflects that the representation rates of Hispanic males had a significant decrease, resulting in their lack of representation in the series. White males and White females remain below the OCLF, with White males experiencing a 4.21% decrease in representation in the series. Black male representation also had a 3.95% decrease and Black females had a 2.3% increase in representation for the series during reporting period. These changes are also reflected in Table 5.

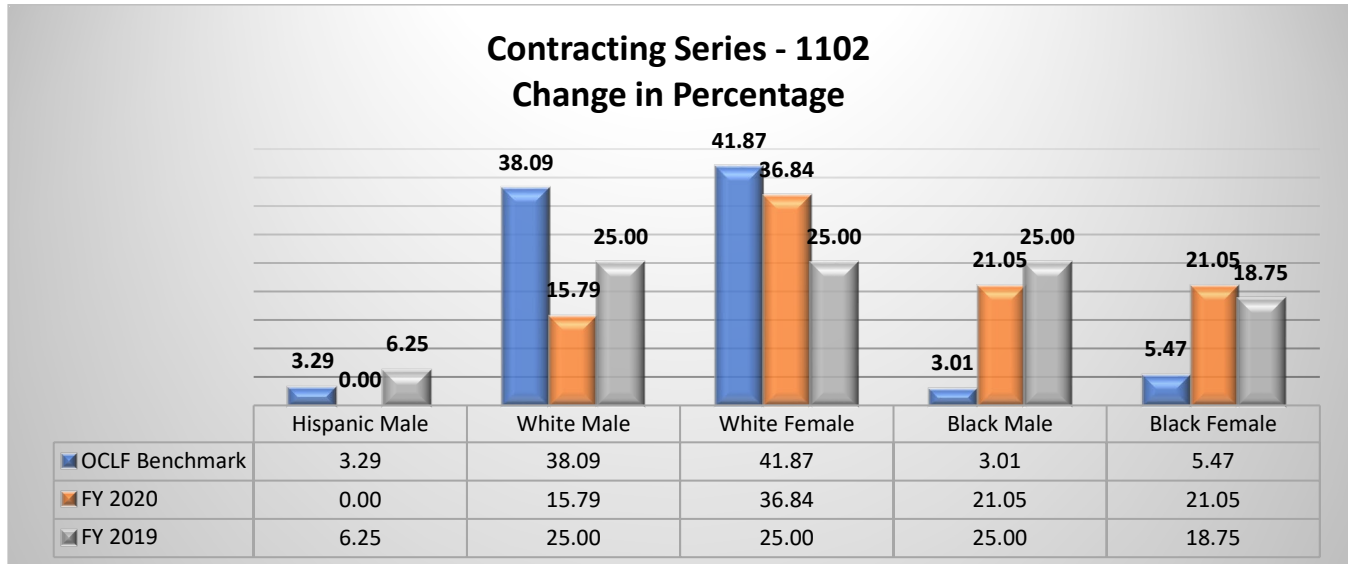


Table 5.

The Financial Analysis 1160 Series reflects that Hispanic males and females continue to be below the OCLF representation rate. It should be noted that Hispanic females are absent from this major occupation in PBGC and White females are .73% below the benchmark.

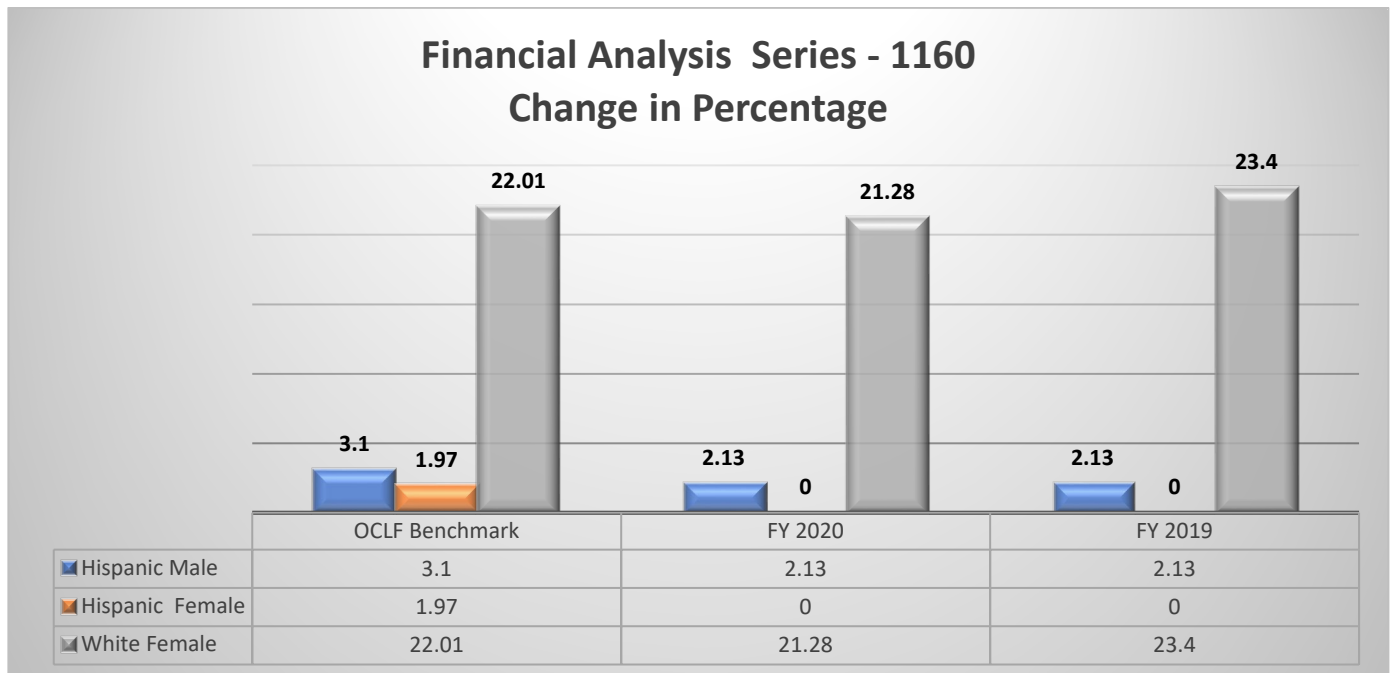


Table 6.

The Actuarial Science 1510 Series representation rates reflect that Hispanic females continue to be absent from the series and that White males and females continue to be below the rate of representation according to the series benchmark. Those changes are reflected in Table 7.

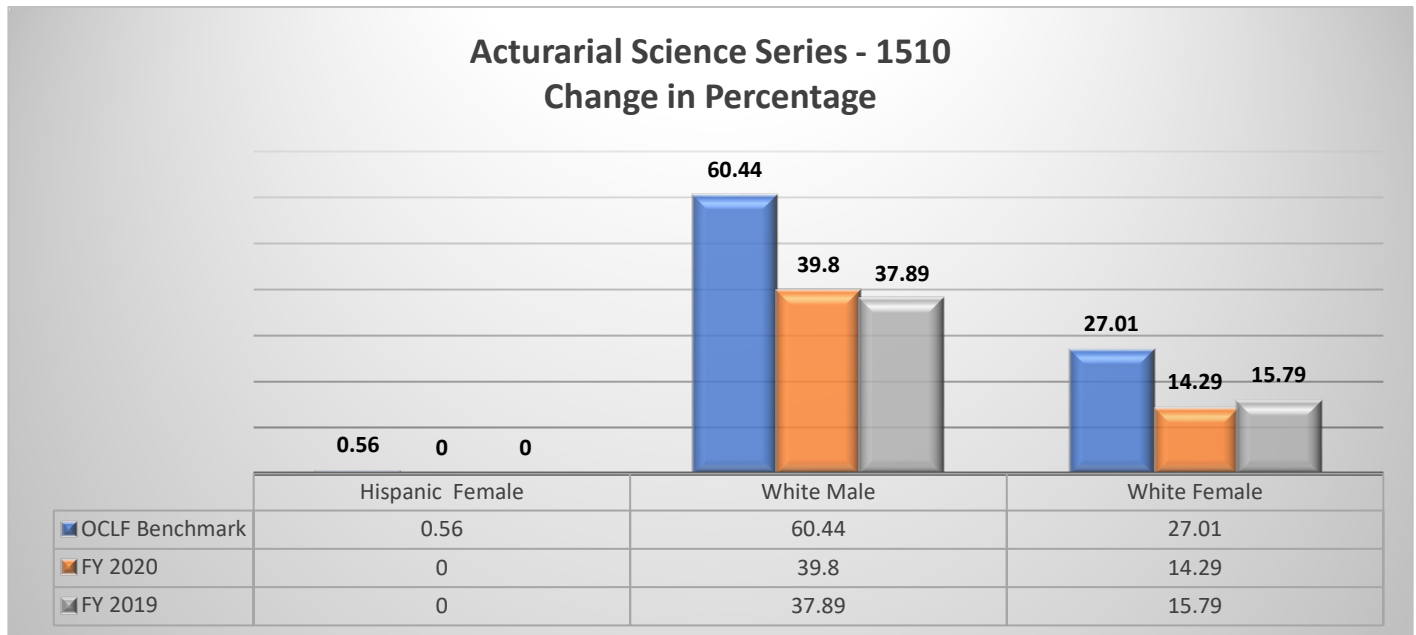


Table 7.

The representation rate for the IT Management 2210 Series reflects that Hispanic males and females and White males and females are below the OCLF benchmark. It should be noted that Hispanic females or conspicuously absent from the series.

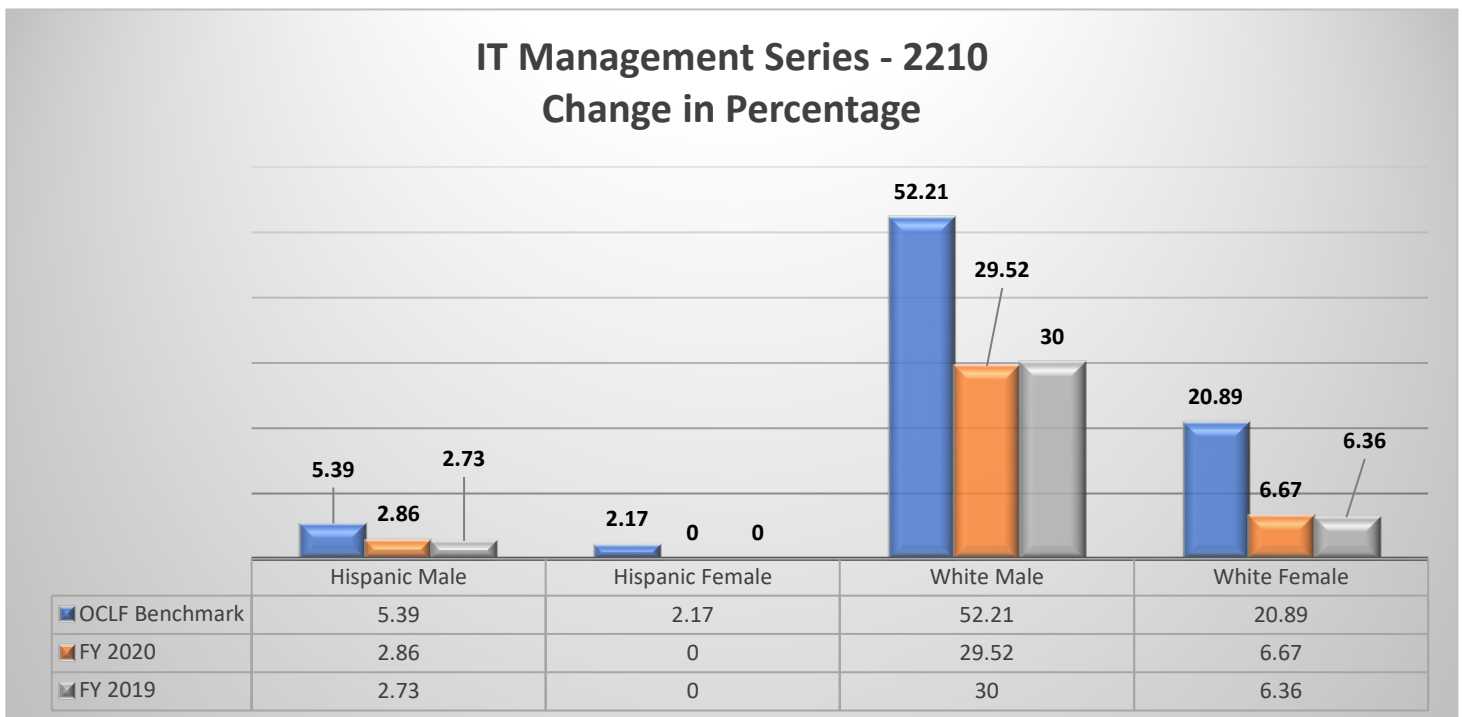


Table 8.

During FY 2020, OEE0 continued to conduct barrier analysis for the demographic groups that separated from PBGC’s workforce at a rate higher than their representation in the Agency. Hispanic males and females have been consistently below the rate of representation in PBGC and the federal government and their separation rate is above their occupation in PBGC’s workforce. Asian males and White females were also separating at a rate higher than their representation in the Agency. Those changes are reflected on Table 9.

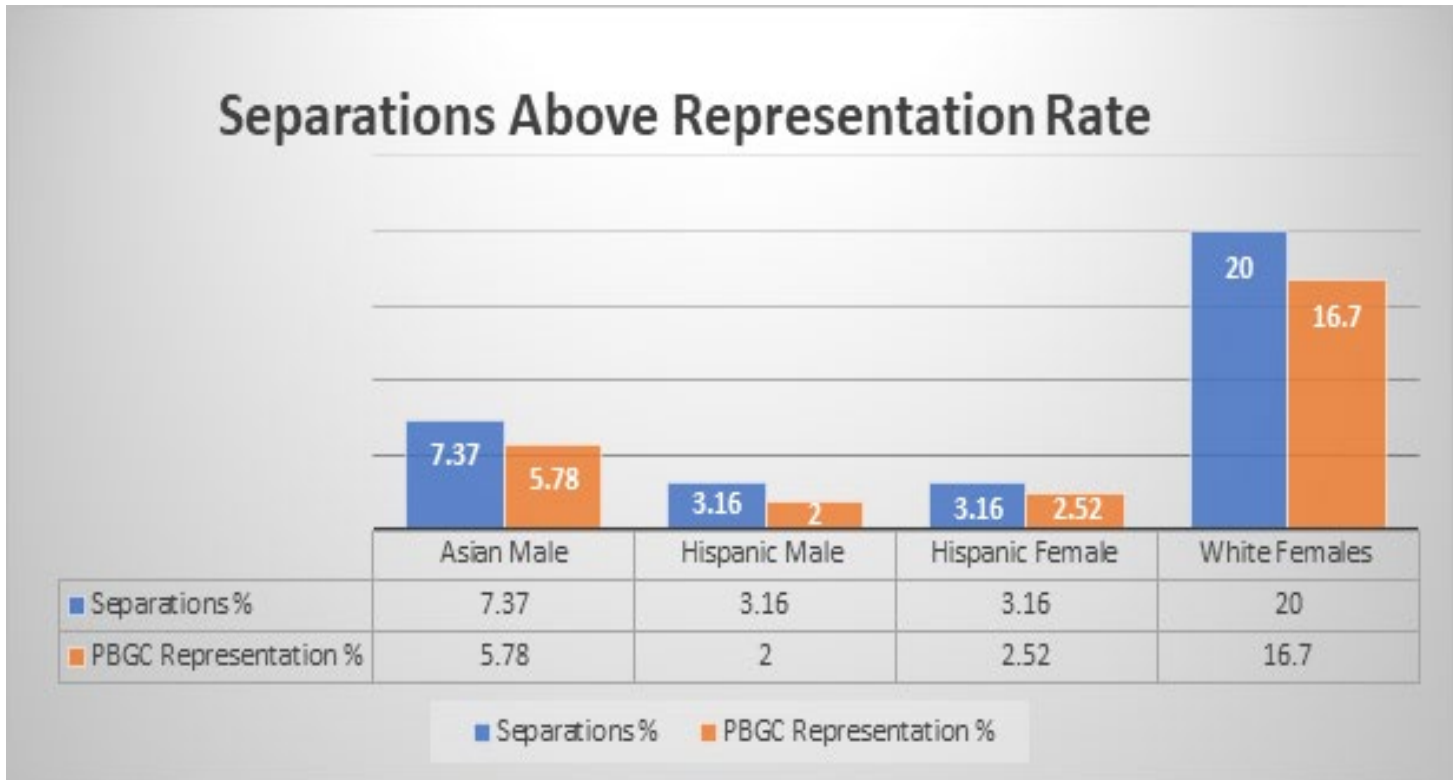


Table 9.

It is the mission of the Office of Equal Employment Opportunity to continue to assist in the eradication of employment discrimination, improve diversity in the workplace, and create an environment where all PBGC employees are valued, respected, and free to develop and perform to their fullest potential. As such, we will continue to investigate any and all triggers to support the ongoing development of PBGC’s model EEO program.

	<p><i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</p>
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**CERTIFICATION of ESTABLISHMENT of CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, Brenecia Watson am the
(Insert name above) (Insert official title/series/grade above)

Principal EEO Director/Official for Pension Benefit Guaranty Corporation
(Insert Agency/Component Name above)

The Agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The Agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

	April 20, 2021
Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.	Date

	April 20, 2021
Signature of Agency Head or Agency Head Designee	Date

MD-715 - PART G

Agency Self-Assessment Checklist

The Part G Self-Assessment Checklist is a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715. This self-assessment permits EEO Directors to recognize, and to highlight for their senior staff, deficiencies in their EEO program that the agency must address to comply with MD-715's requirements. Nothing in Part G prevents agencies from establishing additional practices that exceed the requirements set forth in this checklist.





All agencies will be required to submit Part G to EEOC. Although agencies need not submit documentation to support their Part G responses, they must maintain such documentation on file and make it available to EEOC upon request.

The Part G checklist is organized to track the MD-715 essential elements. As a result, a single substantive matter may appear in several different sections, but in different contexts. For example, questions about establishing an anti-harassment policy fall within Element C (Management and Program Accountability), while questions about providing training under the anti-harassment policy are found in Element A (Demonstrated Commitment from Agency Leadership).





For each MD-715 essential element, the Part G checklist provides a series of "compliance indicators." Each compliance indicator, in turn, contains a series of "yes/no" questions, called "measures." To the right of the measures, there are two columns, one for the agency to answer the measure with "Yes", "No", or "NA;" and the second column for the agency to provide "comments", if necessary. Agencies should briefly explain any "N/A" answer in the comments. For example, many of the sub-component agencies are not responsible for issuing final agency decisions (FADs) in the EEO complaint process, so it may answer questions about FAD timeliness with "NA" and explain in the comments column that the parent agency drafts all FADs.



A "No" response to any measure in Part G is a program deficiency. For each such "No" response, an agency will be required in Part H to identify a plan for correcting the identified deficiency. If one or more sub-components answer "No" to a particular question, the agency-wide/parent agency's report should also include that "No" response.



MD-715 - PART G
Agency Self-Assessment Checklist



Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP				
This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.				
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	Current Part G Questions
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	July 8, 2020	A.1.a.2
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes		
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
A.2.a	Does the agency disseminate the following policies and procedures to all employees:			
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes		
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes		
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:			

A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes		
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes		A.2.c
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	https://www.pbgc.gov/sites/default/files/pbgc-procedures-for-processing-requests-for-reasonable-accommodation.pdf	A.3.c
A.2.c	Does the agency inform its employees about the following topics:			
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	The complaint process is always posted on the intranet and in lounge areas. Classes are offered annually, and new employees are informed of the process during New Employee Orientation (NEO).	A.2.a
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	The ADR process is always posted on the intranet. Classes that include information on the ADR process are offered annually. New employees are also informed of the process during New Employee Orientation.	
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	The Reasonable Accommodation brochure is provided to all employees during New Employee Orientation and the PBGC Reasonable Accommodation Coordinator provides a briefing to all new employees during NEO on reasonable accommodation procedures. In addition, the information is available on the intranet.	
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	HRD provides training regarding workplace behavior, Harassment Inquiry Committee (HIC), Agency policy, arbitration/mediation, and inappropriate behaviors/ethics in the workplace. During these sessions, employees are provided information tools such as the PBGC’s Anti-harassment Policy brochure, the current OEEOP Prevention of Workplace Harassment Policy Statement and the Equal Employment Opportunity Policy Statement	





			to give notice to federal employees of inappropriate behaviors in the workplace and the potential result of such actions.	
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Notices are also publicly displayed in HRD’s front office and the Agency intranet site.	A.3.b
 Compliance Indicator  Measures	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	EEO Merit Award and Certificates.	
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes		
Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.				
 Compliance Indicator  Measures	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure Met? (Yes/No/NA)	Comments	
B.1.a	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		B.1.a
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as	NA		





	the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.			
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		B.1.d
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		B.2.a
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comment's column.	Yes	July 13, 2020	B.2.b
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes		
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes		B.3.a

B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes		
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes		F.3.b
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes		
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	NA		
 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments	
B.3.a	Does EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes		B.2.c & B.2.d
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion	Yes	PBGC Strategic Goal 3: Maintain High Standards of Stewardship and Accountability: Encourage	

	principles? [see MD-715, II(B)] If “yes”, please identify the EEO principles in the strategic plan in the comments column.		and support a diverse and inclusive work environment that encourages employee engagement; Foster a diverse, high-performing workforce; Foster a culture of inclusion that encourages collaboration, flexibility, and fairness.	
 Compliance Indicator  Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments	
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes		B.3.b
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes		B.4.a
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes		E.5.b
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes		B.4.f & B.4.g
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if	NA		E.1.c



	applicable? [see 29 CFR §1614.102(c)(2)]			
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes		B.4.c
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes		
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes		B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes		B.4.d
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes		
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes		
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes		B.1.b
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required	Yes		E.2.d



	32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?			
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes		E.2.e
 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments New Indicator	
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:			
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Yes		
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes		A.3.d
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes		
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes		
B.5.a.5	ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes		E.4.b
 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments New Indicator	
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes		



B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes		D.1.a
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes		D.1.b
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Yes	During FY 2020, action plans were maintained and continued to be implemented. We will continue to measure results in 2021.	D.1.c
Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.				
 Compliance Indicator  Measures	C.1 – The agency conducts regular internal audits of its component and field offices.	Measure Met? (Yes/No/NA)	Comments	
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	PBGC does not have field offices	
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	PBGC does not have field offices	
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	PBGC does not have field offices	
 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.2.a.1	Does the anti-harassment policy require corrective action to	Yes		





	prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]			
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes		
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes		
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	Yes		
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of	Yes		



	disability-based harassment? [see 29 CFR 1614.203(d)(2)]			
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Yes		
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes		E.1.d
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes		
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes		
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes		
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	Yes		E.1.e
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes		





C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	Yes	https://www.pbgc.gov/sites/default/files/pbgc-procedures-for-processing-requests-for-reasonable-accommodation.pdf	
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments	New Indicator
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes		
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:			
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes		A.3.a.1
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes		A.3.a.4
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes		A.3.a.5
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes		A.3.a.6
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes		A.3.a.7



C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Yes		A.3.a.8
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes		
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes		A.3.a.2
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes		
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes		
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes		
 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments	
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes		
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training	Yes		C.2.a, C.2.b, & C.2.c

	programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]			
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes		
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes		
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes		
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes		
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes		
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes		
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes		
 Compliance Indicator  Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments	
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes		C.3.a.



C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	There were no managers or supervisors disciplined/sanctioned for this fiscal year.	C.3.c
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes		
 Compliance Indicator  Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments	
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	EEO provides annual updates to management and supervisors.	C.1.a
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		
Essential Element D: PROACTIVE PREVENTION				
This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.				
 Compliance Indicator  Measures	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments	
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes		





D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes		
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes		
 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments	New Indicator
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes		
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes		B.2.c.2
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes		B.2.c.1



D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.	Yes	The EEO programs reviews workforce data. Agency HR and corporate strategic plans, complaints data, survey data, reasonable accommodations data and conducts focus groups and surveys to identify potential barriers.	
 Compliance Indicator  Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes	No barriers have been identified	
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes	No barriers identified during reporting period; however, triggers were investigated.	
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes		
 Compliance Indicator  Measures	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Met? (Yes/No/NA)	Comments New Indicator	
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	https://www.pbgc.gov/sites/default/files/fy2019-md715-report.pdf	





D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes		
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes		
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes		
Essential Element E: EFFICIENCY				
This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.				
 Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments	
 Measures				
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes		E.3.a.1
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes		E.3.a.2
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes		
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	Yes	Yes, the Agency issues acceptance letter/dismissal decisions within a reasonable time. The internal office policy is to issue within 14 days of receipt of the formal complaint.	



E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes		
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes		E.3.a.3
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes		
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes		E.3.a.4
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes		E.3.a.7
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	Yes, the Agency uses contract investigators to conduct EEO discrimination investigations. The EEO attorney-advisor requires weekly progress reports from the contract investigators during an investigation. In addition, the EEO attorney-advisor, reviews the report of investigation for legal sufficiency before it is issued. If there are any identified problems, the contract investigator is required to fix the problem.	E.2.c

E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes		
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator	
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes		
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	The Equal Employment Opportunity Office has an attorney Advisor on staff to ensure legal sufficiency reviews are separate and apart from the agency representative.	E.6.a
E.2.c	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes		
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes		E.6.b
E.2.e	If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency</i>	Yes		E.6.c

	<i>Program: Efficiency (Dec. 1, 2004)]</i>			
 Compliance Indicator	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments	
 Measures				
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes		E.4.a
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes		E.4.c
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes		D.2.a
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes		
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes		E.4.d
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes		
 Compliance Indicator	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments	
 Measures				
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:			
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes		E.5.a

E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes		E.5.c
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes		E.5.f
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes		
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes		
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes		
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes		
 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	By conducting annual Barrier and Trend Analysis.	E.5.e
E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	PBGC remains current regarding industry best practices and researches EEOC's website, meets with other federal agencies to identify their best practices, gathers information from public entities regarding their best practices and seeks to implement relevant best practices when identified and appropriate.	E.5.g

E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes		E.3.a
Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.				
 Compliance Indicator  Measures	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments	
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes		F.1.a
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes		E.3.a.6
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		F.2.a.1
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		F.2.a.2
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes		F.3.a.
 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments Indicator moved from E-III Revised	
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes		C.3.d
F.2.a.1	When a complainant requests a hearing, does the agency timely	Yes		E.3.a.5

	forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]			
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes		E.3.a.7
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes		
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		F.3.d (1 to 9)
 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments	
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes		
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes		

**MD-715 – Part H
Agency EEO Plan to Attain the Essential Elements of a Model EEO Program**

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Applicant Flow Data	The tables that PBGC receives from IBC fail to provide complete applicant flow data which is necessary to conduct an accurate data analysis. HRD manages OEEO's access to IBC Datamart data and is responsible for managing PBGC's Human Resources Information Systems (HRIS).

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
12/01/2020	To have access to data that includes complete and accurate applicant flow data.	09/30/2021		Ongoing

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Human Resources Director	Arrie Etheridge	No

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Identify if funding is necessary to enhance PBGC's current HRIS to increase its capacity to provide data necessary for accurate barrier analysis.	No		Ongoing

Report of Accomplishments

Fiscal Year	Accomplishments
	None

**MD-715 – Part I
Agency EEO Plan to Eliminate Identified Barrier**

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger												
Hispanic representation in PBGC is below the CLF benchmark	All Data Tables	<p>The Office of Equal Employment Opportunity continued to conduct its barrier analysis with the review of FY 2020 MD-715 workforce data tables. We reviewed all tables to identify how the data could impact the representation rates of Hispanics and to determine if triggers were identified through analysis of the data.</p> <p>Compared to the National Civilian Labor Force (NCLF), Hispanic employees have lower than anticipated representation in the PBGC workforce. The participation rates of Hispanic males and females in PBGC compared to the NCLF benchmark are as follows:</p> <table border="1" data-bbox="688 953 1279 1121"> <thead> <tr> <th></th> <th>Males</th> <th>Females</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>PBGC</td> <td>2.00%</td> <td>2.52%</td> <td>4.52%</td> </tr> <tr> <td>NCLF</td> <td>5.17%</td> <td>4.79%</td> <td>9.96%</td> </tr> </tbody> </table> <p>It should be noted, that during FY 2020, Hispanics males held 2, or 1.08% of Grades GS-15 or above and Hispanic females held 3, or 1.61% of Grades GS-15 or above. Both percentages are below the benchmark identified in the chart above.</p> <p>Hispanics separated at a rate of 3.16% for both males and females; higher than their representation in PBGC's workforce.</p>		Males	Females	Total	PBGC	2.00%	2.52%	4.52%	NCLF	5.17%	4.79%	9.96%
	Males	Females	Total											
PBGC	2.00%	2.52%	4.52%											
NCLF	5.17%	4.79%	9.96%											

EEO Group(s) Affected by Trigger

EEO Group
Hispanic or Latino Males - YES
Hispanic or Latino Females - YES

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Hispanic representation in grades, in major occupations, applicant flow data, recruitment, and hiring.
Complaint Data (Trends)	Yes	Complainant demographics, bases and Issues reported.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	Responses to employee perceptions of the work environment as it relates to equal employment opportunity.
Exit Interview Data	No	
Focus Groups	Yes	Perceptions of Hispanic females in PBGC's workforce regarding career development, barriers to next grade level and promotional opportunities.
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Industry practices / best practices. Federal government wide demographic reports.
Other (Recruitment & Retention Bonus)	Yes	Demographics of bonus recipients to recruit and retain employees.

Status of Barrier Analysis Process

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

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
The workforce data analysis suggests that barriers may exist for Hispanic employees in the hiring/selections processes of all PBGC's mission-critical occupations and representation at the GS-15 and SL grade level. When reviewing workforce data tables, Hispanics applied and were qualified for vacancies during FY 2020. However, a nexus between this red flag and organizational policies, procedures or practices could not be made.

Objective(s) and Dates for EEO Plan

Objective	Date Initiated	Target Date	Sufficient Funding & Staffing? (Yes or No)	Modified Date	Date Completed
Increase the hiring of Hispanic males and females in PBGC by expanding the applicant pool for mission-critical occupations where Hispanics are below their benchmark's representation. Work with management and staff to identify any barriers and develop effective strategies and action plans. Provide recommendations to organizational management to mitigate identified triggers and potential barriers.	October 1, 2016	September 30, 2023	Yes		Ongoing

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
HRD Directors and Staff, PBGC, Department Directors and Management Team	Various	Yes
OEEEO Director	Brenecia Watson	Yes
Lead EEO Specialist	Hope Fuller	Yes
EEO Specialist	Cynthia Searles	Yes
EEO Specialist	Kimberly Rodgers	Yes
Management Analyst	Beverley Hebron	Yes

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Modified Date	Completion Date
September 30, 2023	Continued review of the applicant pool data to identify trends/barriers in hiring and selection of Hispanic employees.	September 30, 2020	Ongoing

Target Date	Planned Activities	Modified Date	Completion Date
September 30, 2023	Continue to investigate data to identify causes that hinder Hispanic representation in comparison to the benchmark.	September 30, 2020	Ongoing
September 30, 2021	Continue to offer bias awareness training through OEE0's YOUiversity program and the PBGC Diversity Council's Inclusion Training program.	September 30, 2020	Ongoing
September 30, 2021	Hispanic Affirmative Employment Committee will sponsor a Brown Bag series regarding proactive career development.	September 30, 2020	Ongoing

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	OEE0 presented "Daring Dialogues" series focused on discussions around race and ethnicity with the goal of this series to address the unseen issues that impact equal employment opportunity.
FY 2020	The Hispanic Affirmative Employment Committee's commitment developed "The State of Hispanics in PBGC" report to identify issues that are of concern to PBGC's Hispanic workforce. The report outlined perceived HR program deficiencies and recommendations to support equal employment opportunity for Hispanics.
FY 2020	OEE0 presented workshops that provided career enhancing information that could be helpful to all demographic groups as they navigate the development of their careers,
FY 2020	<p>HOLA, the Hispanic Affinity Group conducted activities to support the professional development of PBGC's Hispanic workforce and to also create connections with the community in order to develop future interest and possible talent pipelines for employment at PBGC.</p> <ul style="list-style-type: none"> HOLA-HACU Mentorship Program- Continued the HOLA-HACU mentorship program in which we paired the summer interns with HOLA members and Agency professionals based on their fields and career aspirations. Each HACU intern was assigned a mentor. For example, two interns expressed interest in pursuing law, so they were paired with two attorneys in OGC. In addition, a Hispanic Supervisory Financial Analyst also served as lead mentor for all interns. Hispanic Legal Students Outreach – HOLA in partnership with Office of the General Counsel (OGC) participated in panels at different law schools in Puerto Rico. The panels focused on labor and employment law featuring local lawyers from the island as well as PBGC attorneys. This event was sponsored by the American Bar Association and PBGC. Leadership Speaker Series – HOLA implemented a Leadership Speaker Series in which Agency leaders meet with HOLA members to talk about career paths and share career advice. HOLA continues to sponsor their annual HOLA Café fundraiser event which served to raise cultural awareness.

	<ul style="list-style-type: none"> • Annual Hispanic Heritage Month Observance event — HOLA members partnered with HRD’s Special Emphasis Program to present a virtual program in recognition of Hispanic Heritage Month Program. • HRD partnered with hiring managers to broaden targeted recruitment efforts to reach a diverse applicant pool.
FY 2020	Developed a survey focused on the perceptions of Hispanic women in PBGC workforce regarding career development opportunities.
FY 2020	Hosted a Brown Bag Flash Mentoring series focused on four of OPM’s Executive Core Qualifications to support women in the proactive and intentional development of their careers.
FY 2020	<p>HRD continued its longstanding and robust partnership with the Hispanic Association of Colleges and Universities (HACU)/National Internship Program.</p> <p>Notwithstanding the COVID-19 pandemic, PBGC continued to host HACU interns, virtually, throughout FY 2020, with one spring intern, six summer interns, and four fall interns. We have a dedicated HACU Program Coordinator, who coordinates a variety of developmental and enrichment activities for the HACU interns.</p> <p>HRD continued to offer a comprehensive leadership development training program for managers and supervisors with courses focused on diversity, inclusion, and unconscious bias in the context of effective leadership practices.</p> <p>The PBGC Diversity Council continued to offer “Be an Inclusion Agent” training presented during staff meetings to encourage dialogue on the impact of unconscious bias in the work unit.</p>

**MD-715 – Part I
Agency EEO Plan to Eliminate Identified Barrier**

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger																																													
Comparing grade representation to the benchmarks.	A/B1 A/B3 A/B4-1 A/B4-2	<p>PBGC’s workforce is comprised of females at a rate of 56% and males at a rate of 44%. In reviewing the breakdown of females by race and ethnicity, there is a significant decline in female representation for Blacks and Hispanics in grades GS-14, GS-15, and SL and grade SL for Asians in comparison to their representation rate in the total workforce.</p> <table border="1" data-bbox="691 884 1370 1087"> <thead> <tr> <th></th> <th>Benchmark</th> <th>GS-14</th> <th>GS-15</th> <th>SL</th> </tr> </thead> <tbody> <tr> <td>Asian</td> <td>6.51%</td> <td>5.81%</td> <td>6.25%</td> <td>2.44%</td> </tr> <tr> <td>Black</td> <td>29.31%</td> <td>20.97%</td> <td>15.97%</td> <td>9.76%</td> </tr> <tr> <td>Hispanic</td> <td>2.52%</td> <td>1.29%</td> <td>2.08%</td> <td>0%</td> </tr> <tr> <td>White</td> <td>16.70%</td> <td>20.65</td> <td>27.08%</td> <td>31.71%</td> </tr> </tbody> </table> <p>Rates for these same groups also show anomalies in senior and mid-level representation and are reflected in the following chart.</p> <table border="1" data-bbox="691 1270 1382 1524"> <thead> <tr> <th></th> <th>Benchmark</th> <th>Executive/ Senior Level</th> <th>Managers/Mid- Level</th> </tr> </thead> <tbody> <tr> <td>Asian</td> <td>6.51%</td> <td>5.38%</td> <td>4.88%</td> </tr> <tr> <td>Black</td> <td>29.31%</td> <td>8.60%</td> <td>19.51%</td> </tr> <tr> <td>Hispanic</td> <td>2.52%</td> <td>1.61%</td> <td>0%</td> </tr> <tr> <td>White</td> <td>16.70%</td> <td>27.42%</td> <td>14.63</td> </tr> </tbody> </table> <p>It should also be noted that Black, White, and Hispanic females are separating above their benchmarks at 29.47%, 20%, and 3.16% respectively.</p>		Benchmark	GS-14	GS-15	SL	Asian	6.51%	5.81%	6.25%	2.44%	Black	29.31%	20.97%	15.97%	9.76%	Hispanic	2.52%	1.29%	2.08%	0%	White	16.70%	20.65	27.08%	31.71%		Benchmark	Executive/ Senior Level	Managers/Mid- Level	Asian	6.51%	5.38%	4.88%	Black	29.31%	8.60%	19.51%	Hispanic	2.52%	1.61%	0%	White	16.70%	27.42%	14.63
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EEO Group(s) Affected by Trigger

EEO Group
All Women –Yes. Specific attention to Asian, Black, and Hispanic females.

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Female representation in grades, in major occupations, and in manager/supervisory positions.
Complaint Data (Trends)	Yes	Complainant demographics, bases and Issues reported.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	Responses to employee perceptions of the work environment as it relates to equal employment opportunity.
Exit Interview Data	No	
Focus Groups	Yes	Perceptions of females in PBGC's workforce regarding career development, barriers to next grade level and promotional opportunities.
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Industry practices / best practices
Other (Recruitment & Retention Bonus)	Yes	Demographics of bonus recipients to recruit and retain employees.

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No, barrier analysis is ongoing.	No

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
No barriers identified

Objective(s) and Dates for EEO Plan

Objective	Date Initiated	Target Date	Sufficient Funding & Staffing? (Yes or No)	Modified Date	Date Completed
Provide resources (trainings, workshops) that support women in the proactive development of their careers.	06/01/2018	Ongoing	Yes		
Provide tools and resources to organizational leadership that supports equal employment opportunity programs.	06/01/2018	Ongoing	Yes		
Advocate for career development programs that support professional development and growth.	05/01/2019	Ongoing	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
HRD Directors and Staff, PBGC, Department Directors and Management Team	Various	Yes
OEEO Director	Brenecia Watson	Yes
Lead EEO Specialist	Hope Fuller	Yes
EEO Specialist	Cynthia Searles	Yes
EEO Specialist	Kimberly Rodgers	Yes
Management Analyst	Beverley Hebron	Yes

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Modified Date	Completion Date
April 2020	The Federal Women's Affirmative Employment Committees began hosting a Brown Bag Flash Mentoring series focused on OPM's Executive Core Qualifications to support women in the		February 2021.

Target Date	Planned Activities	Modified Date	Completion Date
	proactive and intentional development of their careers.		
September 2021	The Federal Women's Affirmative Employment Committees will sponsor a Brown Bag series regarding proactive career development.		Ongoing

Report of Accomplishments

Fiscal Year	Accomplishments
FY 2020	Conducted a series of focus group comprised of women in PBGC to gather anecdotal data and develop hypothesis on issues impacting women at all grade
FY 2020	OEEEO presented "Daring Dialogues" series focused on discussions around race and ethnicity with the goal of addressing the unseen issues that impact equal employment opportunity.
FY 2020	FEW members were able to attend webinars hosted by the FEW National Organization that included: Anatomy of the Greatest Collaborations, Transitioning from Manager to Leader, Building Influential Relationships to Propel Your Career, Coaching as a Management Tool and many more.
FY 2020	Developed a survey focused on the perceptions of women in PBGC workforce regarding career development opportunities.
FY 2020	Hosted a Brown Bag Flash Mentoring series focused on four of OPM's Executive Core Qualifications to support women in the proactive and intentional development of their careers.
FY 2020	The PBGC Diversity Council sponsored a Senior Leader Brown Bag Series led by several women in Senior Leadership positions to foster dialogue on creating inclusion in a virtual work environment.

MD-715 – Part J
Special Program Plan for the Recruitment, Hiring, Advancement,
and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Please note: The triggers identified in this Part J are based solely on individual self-identification obtained through OPM's Standard Form 256. We anticipate the total count of PWDs and PWTDs will increase and some triggers will be eliminated as additional individuals with disabilities are identified through the agency's reasonable accommodations program and through appointments under hiring authorities that take disability into account.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
 - a. Cluster GS-1 to GS-10 (PWD) Yes 0 No 0
 - b. Cluster GS-11 to SES (PWD) Yes X No 0

Where there is representation in the cluster GS-01 to GS-10, PWD did not have a trigger and are reflected at or above the benchmark. However, in the cluster GS-11 to SL, representation rates were below the 12% benchmark for grades GS-13 thru SL and is reflected in the graph.

PWD 12% Benchmark	
GS-13	10.70%
GS-14	10.00%
GS-15	3.47%
SL	4.88%

This graph shows that Persons with Disabilities are below the benchmark for representation.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
 - a. Cluster GS-1 to GS-10 (PWTD) Yes 0 No 0
 - b. Cluster GS-11 to SES (PWTD) Yes X No 0

Where there is representation, we have determined that there is not a trigger for grade level cluster GS-01 through GS-10. However, the triggers for grade level cluster GS-14 through SL are reflected in the following chart:

PWTD 2% Benchmark	
GS-14	1.29%
GS-15	0.69%
SL	0.00%

This graph shows that Persons with targeted Disabilities are below the benchmark for representation.

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

Each year numerical goals are communicated to the Corporation's Senior leaders at the state of the agency briefing. That information is also included in the annual MD-715 report which is available on PBGC's intranet and the public internet.

Section II: Model Disability Program

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

A. Plan to Provide Sufficient & Competent Staffing for the Disability Program

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

Yes X No 0

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	7	0	0	Brandy Pelham, Supervisory HR Specialist
Answering questions from the public about hiring authorities that take disability into account	1		1	Donald Beasley Selective Placement Program Coordinator HRD; Karen Esser Diversity and Inclusion Program Manager, HRD, esser.karen@pbgc.gov

Processing reasonable accommodation requests from applicants and employees	1			Donald Beasley Reasonable Accommodation Coordinator
Section 508 Compliance			Section 508 Compliance Team, headed by the Office of Information Technology	Angela Watkins IT Specialist and Section 508 Compliance Team Chair
Architectural Barriers Act Compliance	1			Delilah LumHo Manager, Facilities and Services Division
Disability Program Manager, Special Emphasis Program for PWD and PWTD	1			Denorse Prince Special Emphasis Program Manager

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

Yes X No 0

One staff member attended NELI’s two-day training course on “ADA/COVID-19.”

B. Plan to Ensure Sufficient Funding for the Disability Program

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

Yes X No 0

HRD manages a centralized budget set aside to purchase items needed as a reasonable accommodation.

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. Plan to Identify Job Applicants with Disabilities

4. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

Selective Placement Program Coordinator (SPPC) receives inquiries from job applicants with disabilities, including individuals with targeted disabilities daily via email. Staffing Specialists in the Staffing and Classification Division receive applications from applicants with disabilities, including individuals with targeted disabilities, through the application process. The Staffing Specialists review the provided documentation and make a determination as to whether the applicant is eligible for veterans’ preference and/or the Schedule A hiring authority. The Staffing Specialists collaborate with the SPPC as necessary.

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

Selective Placement Program Coordinator (SPPC) receives inquiries from job applicants with disabilities, including individuals with targeted disabilities daily via email and forwards Schedule A letters and resumes to the agency's Disability Program Staffing Specialist. The Staffing Specialist determines which hiring authorities the applicant is eligible for and whether the applicant is minimally qualified for the position. The Staffing Specialist then refers eligible and minimally qualified applicants to the Hiring Official with an explanation of how they should be considered.

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

Selective Placement Program Coordinator (SPPC) receives inquiries from job applicants with disabilities, including individuals with targeted disabilities daily via email and forwards Schedule A letters and resumes to the agency's Disability Program Staffing Specialist. The Staffing Specialist determines which hiring authorities the applicant is eligible for and whether the applicant is minimally qualified for the position. The Staffing Specialist then refers eligible and minimally qualified applicants to the Hiring Official with an explanation of how they should be considered.

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

Yes No N/A

Due to COVID-19, SPPC did not offer a separate training for PBGC Managers on the ABC's of Schedule A Hiring as this training is typically conducted in-person. Instead, SPPC incorporated components from this training into a mandatory, on-line, supervisory training on Reasonable Accommodation.

B. Plan to Establish Contacts with Disability Employment Organizations

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

SPPC forwards PBGC vacancy announcements via email to numerous organizations that assist PWDs in securing and maintaining employment. The Staffing and Classification Division attends career fairs specifically targeted to disabled veterans, including veterans with targeted disabilities, to discuss hiring opportunities at the Agency as well as the application process and the various hiring authorities under which the attendees might be eligible. The Staffing and Classification Division accepted resumes from disabled veterans, including veterans with targeted disabilities, and determines which of them may be referred noncompetitively under one or more hiring authorities. Beginning March 2020, staff did not attend in-person career fairs due to COVID-19.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

a. New Hires for Permanent Workforce (PWD)	Yes 0	No X
b. New Hires for Permanent Workforce (PWTD)	Yes 0	No X

The sample size was limited as there were few hires in all the major occupations.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. New Hires for MCO (PWD)	Yes 0	No X
b. New Hires for MCO (PWTD)	Yes 0	No X

The sample size was limited as there were few hires in all the major occupations.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. Qualified Applicants for MCO (PWD)	Yes 0	No X
b. Qualified Applicants for MCO (PWTD)	Yes 0	No X

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. Promotions for MCO (PWD)	Yes 0	No X
b. Promotions for MCO (PWTD)	Yes 0	No X

There were no internal applications for any of the major occupations.

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

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

A. Advancement Program Plan

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

In order to increase the representation of disabled veterans in the PBGC Pathways (Student Intern) Program, the Staffing and Classification Division has established a hiring and retention plan for those individuals.

B. Career Development Opportunities

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

PBGC has a variety of career development programs that require supervisory approval but not competition, including: (1) Project Management Certification; (2) executive coaching; (3) conflict coaching; (4) detail opportunities; (5) Pathways and HACU internships; (6) multiple training opportunities for employees at all grade levels; (7) training program for new supervisors. The Agency has a Veterans Integration Program (VIP) that is designed to equip Federal employees who will be working with newly-hired veterans with the tools and skills needed to assist veterans with their transition the federal workforce (through instructor-led and web-based training). PBGC continues to use career ladder promotions as a recruitment strategy to hire at the entry level with development, growth, and promotion potential.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A		N/A		N/A	
Fellowship Programs	N/A		N/A		N/A	
Mentoring Programs	N/A		N/A		N/A	
Coaching Programs	N/A		N/A		N/A	
Training Programs	N/A		N/A		N/A	
Detail Programs	N/A		N/A		N/A	
Other Career Development Programs	N/A		N/A		N/A	

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

- | | | |
|---------------------|-------|------|
| a. Applicants (PWD) | Yes 0 | No X |
| b. Selections (PWD) | Yes 0 | No X |

Not applicable. The Agency does not have career development programs that require competition.

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

- | | | |
|----------------------|-------|------|
| a. Applicants (PWTD) | Yes 0 | No X |
| b. Selections (PWTD) | Yes 0 | No X |

Not applicable. The Agency does not have career development programs that require competition.

C. Awards

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|---|-------|------|
| a. Awards, Bonuses, & Incentives (PWD) | Yes 0 | No X |
| b. Awards, Bonuses, & Incentives (PWTD) | Yes 0 | No X |

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|-------------------------|-------|------|
| a. Pay Increases (PWD) | Yes 0 | No X |
| b. Pay Increases (PWTD) | Yes 0 | No X |

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- | | | |
|--------------------------------------|-------|------|
| a. Other Types of Recognition (PWD) | Yes 0 | No X |
| b. Other Types of Recognition (PWTD) | Yes 0 | No X |

D. Promotions

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

- a. SES
 - i. Qualified Internal Applicants (PWD) Yes 0 No X
 - ii. Internal Selections (PWD) Yes 0 No X
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Yes 0 No X
 - ii. Internal Selections (PWD) Yes 0 No X
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Yes 0 No X
 - ii. Internal Selections (PWD) Yes 0 No X
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Yes 0 No X
 - ii. Internal Selections (PWD) Yes 0 No X

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

- a. SES
 - i. Qualified Internal Applicants (PWTD) Yes 0 No X
 - ii. Internal Selections (PWTD) Yes 0 No X
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWTD) Yes 0 No X
 - ii. Internal Selections (PWTD) Yes 0 No X
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTD) Yes 0 No X
 - ii. Internal Selections (PWTD) Yes 0 No X
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTD) Yes 0 No X
 - ii. Internal Selections (PWTD) Yes 0 No X

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

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

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

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

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

a. Executives

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

b. Managers

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

c. Supervisors

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

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

a. Executives

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

b. Managers

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

c. Supervisors

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

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

- | | | |
|------------------------------------|-------|------|
| a. New Hires for Executives (PWD) | Yes 0 | No X |
| b. New Hires for Managers (PWD) | Yes 0 | No X |
| c. New Hires for Supervisors (PWD) | Yes 0 | No X |

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

- | | | |
|-------------------------------------|-------|------|
| a. New Hires for Executives (PWTD) | Yes 0 | No X |
| b. New Hires for Managers (PWTD) | Yes 0 | No X |
| c. New Hires for Supervisors (PWTD) | Yes 0 | No X |

Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace personal assistance services.

A. Voluntary and Involuntary Separations

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Yes X No 0 N/A 0

The Agency did convert all Schedule A employees into the competitive service.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

- | | | |
|----------------------------------|-------|------|
| a. Voluntary Separations (PWD) | Yes 0 | No X |
| b. Involuntary Separations (PWD) | Yes 0 | No X |

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

Voluntary Separations (PWTD)	Yes 0	No X
Involuntary Separations (PWTD)	Yes 0	No X

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

Not Applicable

B. Accessibility of Technology and Facilities

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

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

Anyone with an accessibility issue related to navigating the pbgc.gov site should contact the webmaster@pbgc.gov (per The [PBGC Website Policies and Procedures](#) and the Accessibility section).

In compliance with Section 508 of the Rehabilitation Act (link is external), PBGC is committed to providing access to its Web pages to all people-disabled or not-seeking information about PBGC. According to its policies for accessibility (link is external), the agency shall take appropriate steps to ensure effective communication with applicants, participants, personnel of other Federal entities, and members of the public.

If you use assistive technology (such as a Braille reader, a screen reader, or TTY) and the format of any material on this Web site interferes with your ability to access information, please contact the PBGC Webmaster at webmaster@pbgc.gov (link sends e-mail) or 202-326-4343. To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the Web address of the requested material, and your contact information. Users who need accessibility assistance can also contact us by phone through the Federal Information Relay Service at 1-800-400-7242 for TTY/Voice communication.

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

<https://www.pbgc.gov/about/pg/footer/aba>

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

PBGC continues ensure access to the building for people with disabilities.

In FY20, the Agency's Section 508 Compliance Team conducted training sessions across the Agency to raise awareness of Section 508 responsibilities and also introduced a new "Acclimate to Section 508 Learning Series" that provided hands-on instruction on how to make Word documents accessible to People with Disabilities. This series will continue in FY 2021.

C. Reasonable Accommodation Program

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

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

30 days

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

(1) PBGC effectively operates a Reasonable Accommodation Program for qualified individuals with disabilities, including having a centralized reasonable accommodation fund and designated Reasonable Accommodation Coordinator;

(2) During FY 2020, PBGC received and timely processed 54 reasonable accommodation requests.

(3) PBGC actively collaborates with the Computer/Electronic Accommodations Program (CAP) and the Job Accommodations Network (JAN);

(4) PBGC ensures easy access and availability of interpreter services for applicants and employees who are deaf or hard of hearing through continued operation of its Interpreter Services Program;

(5) PBGC highlights disability topics through a Disability Awareness Series, with speakers, information and articles in the PBGC newsletter;

(6) PBGC includes information about the Workforce Recruitment Program, Diversity and Inclusion, Special Emphasis Observances, and the Reasonable Accommodation Program on its HRD intranet webpage;

(7) PBGC maintains a videophone in its lobby to accommodate deaf and hard of hearing visitors;

(8) PBGC has an annual mandatory reasonable accommodation and Diversity & Inclusion training requirement for all supervisors and managers and hosted and delivered multiple training sessions in these areas;

(9) The HRD Reasonable Accommodation brochure is provided to all employees during New Employee Orientation (NEO) and the PBGC Reasonable Accommodation Coordinator provides a briefing to all new employees during NEO on reasonable accommodation procedures. In addition, the information is available on the intranet via the Employee and Labor Relations Management Division (ELRMD) link entitled "Reasonable Accommodations" at:

http://intranet/human_resources/emp_labor_relations/accommodations.cfm

and on the internet at:

http://www.pbgc.gov/documents/reasonable_accom.pdf

D. Personal Assistance Services Allowing Employees to Participate in the Workplace

Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The PAS policy is included in the Reasonable Accommodations Policy. Both were approved by EEOC in FY 19 and are posted on PBGC's Intranet. PAS training will be incorporated into the mandatory RA training for supervisors beginning in FY21.

Section VI: EEO Complaint and Findings Data

A. EEO Complaint data involving Harassment

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

Yes 0 No X N/A 0

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Yes 0 No X N/A 0

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

Not Applicable due to no findings.

B. EEO Complaint Data involving Reasonable Accommodation

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?
 Yes 0 No X N/A 0
2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?
 Yes 0 No X N/A 0
3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Not Applicable due to no findings.

Section VII: Identification and Removal of Barriers

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?
 Yes 0 No X
2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?
 Yes 0 No 0 N/A X
3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

Trigger 1	While there may be a trigger in terms of representation, most of the sample sizes are too small to determine if there were barriers. However, as we continue to conduct barrier analysis, we will continue to look for issues that limit equal employment opportunity for PWD and PWTD.	
Barrier(s)	Not Identified	
Objective(s)	To increase representation in PBGC of PWDs and PWTDs.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
HRD, OEEO, Agency leadership		No
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Ongoing		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected

Workforce Data Tables	Yes	Representation Rates of PWD and PWTD in major occupations and grades.		
Complaint Data (Trends)	Yes	Complainant demographics, bases and Issues reported.		
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	Yes	Employee Perceptions		
Exit Interview Data	No			
Focus Groups	Yes	Perceptions of females with disabilities in PBGC's workforce regarding career development, barriers to next grade level and promotional opportunities		
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC data on disability findings, OPM, and industry practices / best practices.		
Other (Please Describe)				
Target Date	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date	Completion Date
Ongoing	HRD will continue to train and educate on disability topics, including mandatory RA training for managers and supervisors.	Yes		
Ongoing	The agency will continue to operate a robust inter-departmental Section 508 Compliance Team and offer hands-on Section 508 accessibility training to all employees.	Yes		
FY 2022	OEEEO will explore how it can also provide programs for PWD and PWTD.	Yes	09/30/20	Efforts are ongoing
Fiscal Year	Accomplishments			
FY 2020	The disability functions are managed by the Human Resources Department (HRD) and it continues to provide relevant trainings on topics that enhance equal employment opportunity for Persons with Disabilities and Targeted Disabilities. HRD maintains a robust Disabled Veterans Affirmative Action program (DVAAP) and in FY 2020, the agency hired more disabled veterans in any single fiscal year since FY 2011, when this data started being tracked. As of the end of FY 2020, disabled veterans represented 3.3% of the agency's FTE workforce.			
FY 2020	The Office of Equal Employment Opportunity's (OEEEO) Disability Affirmative Employment Committee (DAEC) continued to support efforts that promote the equal employment opportunity of persons with disabilities and persons with targeted disabilities.			
FY 2020	The Disability Affirmative Employment Committee developed a report on the Status of persons With Disabilities in PBGC. The report will be briefed to the Agency head in FY 2021.			

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

The Agency has not identified any barriers. However, because barrier analysis is ongoing, the specific task identified was extended.

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

DAEC has created a strategic plan that supports the Agency's goal of retaining and recruiting PWDs and PWTDs. Planned activities include collaborating with HRD to participate in university recruitment fairs and leveraging current career enhancing programs, such as WRP.

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

Activities to improve ongoing efforts include collaboration with Disability Program Manager.

Appendix