



Pension Benefit  
Guaranty Corporation

Management Directive 715  
Annual Office of Equal Employment Opportunity  
Program Status Report  
Fiscal Year 2024

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## 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 |                        | 445 12th Street SW | Washington, DC |       | 20024    | BG          | 11        |

### Part B - Total Employment

| Total Employment    | Permanent Workforce | Temporary Workforce | Total Workforce |
|---------------------|---------------------|---------------------|-----------------|
| Number of Employees | 939                 | 45                  | 984             |

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

| Agency Leadership       | Name         | Title                |
|-------------------------|--------------|----------------------|
| Head of Agency          | Alice Maroni | Acting PBGC Director |
| Head of Agency Designee | N/A          |                      |

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

| <b>EEO Program Staff</b>                               | <b>Name</b>      | <b>Title</b>                         | <b>Occupational Series</b> | <b>Pay Plan and Grade</b> | <b>Phone Number</b> | <b>Email Address</b>      |
|--|------------------|--------------------------------------|----------------------------|---------------------------|---------------------|---------------------------|
| Principal EEO Director/Official                        | Hope Fuller      | Acting EEO Director                  | 0260                       | GS-15                     | 202-229-3345        | fuller.hope@pbgc.gov      |
| Lead EEO Specialist                                    | Hope Fuller      | Lead EEO Specialist                  | 0260                       | GS-14                     | 202-229-3345        | fuller.hope@pbgc.gov      |
| Complaint Processing Program Manager                   | Jamelah Nesbit   | Acting Complaints Processing Manager | 0260                       | GS-13                     | 202-229-3043        | Nesbit.jamelah@pbgc.gov   |
| Management & Program Analyst                           | Angela Grimes    | Mgmt. & Program Analyst              | 0201                       | GS-14                     | 202-229-4855        | grimes.angela@pbgc.gov    |
| EEO Specialist   | Kimberly Rodgers | EEO Specialist                       | 0260                       | GS-13                     | 202-229-3575        | rodgers.kimberly@pbgc.gov |
| Management Analyst                                     | Beverley Hebron  | Program Analyst                      | 0343                       | GS-13                     | 202-229-6237        | hebron.beverley@pbgc.gov  |
| Other EEO Staff  | Sherley Lamarre  | Training Specialist                  | 1712                       | GS-13                     | 202-229-3976        | lamarre.sherley@pbgc.gov  |
| Management & Program Analyst                           | Denorse Prince   | HR Specialist                        | 0201                       | GS-13                     | 202-229-4026        | prince.denorse@pbgc.gov   |
| Reasonable Accommodation (Coordinator) Program Manager | Roderick Duncan  | HR Specialist                        | 0201                       | GS-13                     | 202-286-7803        | duncan.roderick@pbgc.gov  |
| Anti-Harassment Program Manager                        | Avious Lawrence  | HR Specialist (LR)                   | 0201                       | GS-14                     | 202-229-3142        | lawrence.avious@pbgc.gov  |
| ADR Program Manager                                    | Jamelah Nesbit   | Acting Complaints Processing Manager | 0260                       | GS-13                     | 202-229-3043        | Nesbit.jamelah@pbgc.gov   |
| Compliance Manager                                     | Jamelah Nesbit   | Acting Complaints Processing Manager | 0260                       | GS-13                     | 202-229-3043        | Nesbit.jamelah@pbgc.gov   |
| Principal MD-715 Preparer                              | Hope Fuller      | Acting EEO Director                  | 0260                       | 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                      |          |
| Alternative Dispute Resolution Fact Sheet                | 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                      | Not Required |
| Disabled Veterans Affirmative Action Program (DVAAP) Report   | No                       | Not Required |
| Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548 | No                       | Not Required |
| Human Capital Strategic Plan  | No                       | Not Required |
| EEO Strategic Plan  | Yes                      | Not Required |
| Results from the most recent Federal Employee Viewpoint Survey or Annual Employee Survey                | No                       | Not Required |

**Part E - Executive Summary OEEOP Program Status Report**  
For Period October 1, 2023, to September 30, 2024

**E.1: Mission**

The Pension Benefit Guaranty Corporation (PBGC) was created by the Employee Retirement Income Security Act of 1974 (ERISA) 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. PBGC continues to play an important role in retirement security by working with employers and unions to preserve their pension plans, provide opportunities for workers to reach their long-term financial goals, and providing a safety net for people whose pensions have failed. During fiscal year 2024, PBGC made benefit payments of over \$5.8 billion to 912,000 participants in trustee single employer plans, providing \$163.1 million in traditional financial assistance to multiemployer plans covering 62,881 participants. PBGC continues to diligently administer two separate insurance programs that are operationally and financially independent.

PBGC's Single-Employer Program covers defined benefit pension plans that generally are sponsored by a single employer. This program is financed by insurance premiums paid by companies that sponsor defined benefit pension plans, investment income from plan assets trustee by PBGC, and recoveries from companies formerly responsible for the plans. During fiscal year 2024 reporting period, the financial status of PBGC's Single-Employer Program's remained healthy with a positive net financial position of \$54.2 billion at the end of FY2024.

PBGC's Multiemployer Program covers defined benefit pension plans that are maintained through one or more collective bargaining agreements between employers and one or more employee organizations or unions. This program is financed by premiums set by Congress and paid for by insured plans, and investment income. During the fiscal year 2024 reporting period, the PBGC Multiemployer Program continued improvement and reported a positive net position of \$2.1 billion at the end of fiscal year 2024. This is primarily due to the enactment of the American Rescue Plan (ARP) of 2021 (Public Law 117.2) and PBGC's implementation of the Special Financial Assistance (SFA) Program, that provides funding to severely underfunded multiemployer pension plans, and will ensure that millions of America's workers, retirees, and their families receive the pension benefits they earned and can retire with dignity. During FY2024, PBGC approved payment of \$14.6 billion in SFA. Our unwavering dedication extends into the future, ensuring the realization of the SFA Program's objectives in the months and years ahead.

PBGC also continued its commitment to maintaining an equitable workplace, by promoting 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 (OEEOP) manages the Agency's Equal Employment Opportunity (EEO) Program and follows the Equal Employment Opportunity Commission's (EEOC) regulations and policy. EEOC evaluates the operation of PBGC's EEO Program and reviews PBGC's employment data, policies, and practices to ensure compliance and annual reporting of the required Management Directive 715 (MD-715) Report.

MD-715 is the policy guidance provided by EEOC to federal agencies to establish and maintain 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.

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 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 EEOC, this report was completed utilizing data compiled at the end of fiscal year 2024 and covers the period from October 1, 2023, through September 30, 2024. 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 during FY 2024 in developing an equitable work environment and its plans for enhancing the EEO program are described in the remainder of this document.

### **PBGC's Accomplishments and Ongoing Commitment to a Model EEO Program**

**PBGC's Senior Leadership** team continues to demonstrate its commitment to moving the Agency to a model EEO program status as defined by EEOC via support of barrier analysis to ensure its integration into agency's strategic operations.

**The Human Resources Department (HRD)** continued to offer Leadership/Executive Coaching to employees at the SL, GS-15, GS-14, and newly added GS-13 grade levels. A total of 17 coaching engagements for GS14 grade levels, and seven coaching engagements for grade level GS-13 were completed during FY24. HRD also presented the following efforts agency wide:

- Veteran's Day Observance
- Disability Awareness Month
- PBGC/HRD Community Day

**The Office of Equal Employment Opportunity (OEEO)** continued to engage senior leaders, human resources staff and hiring officials to identify methods to improve equal employment opportunity via quarterly dashboards, EEO and organizational collaboration, and through various EEO trainings to include:

- 3-Part Series on the ABCs of EEO
- EEO Boot Camp for Supervisors: A Day in the Life of a Supervisor
- OEEO collaborated with OGC and HRD to present supervisors/managers with EEO, Harassment and Reasonable Accommodation training.

**PBGC's Section 508 Compliance Team** is an interagency team comprised of 12 representatives from across the agency. The team continued to raise awareness by conducting the following training:

- Multiple virtual "Acclimate to Section 508" Learning Series courses throughout the year. The Section 508 Intra-Agency Compliance Team has 12 representatives, including OEEO, OGC, OIT, OMA, and OPEA.
- Participated in Annual Community Day.
- Promoted Accessibility Tools User Group (ATUG) sessions.
- Personalized section 508 accessibility group training for departments and divisions.



- Conducted monthly Q&A and Mission Accessible tips which honors National Disability Employment Awareness Month.
- Provided PBGC TechU hands-on training.

**The Office of Policy and External Affairs (OPEA)** includes two departments - Communications Outreach & Legislative Affairs (COLA), and Policy, Research and Analysis (PRAD). During this reporting period, COLA continued recruitment efforts in collaboration with HRD.

- During this reporting period, COLA also utilized multiple student positions to hire full-time employees, leveraging the Pathways and HACU student programs.
- PRAD has routinely shared hiring and promotion opportunities with staff, resulting in multiple internal promotions, during fiscal year 2024.
- In support of succession planning goals, OPEA continues to work toward increased job sharing and knowledge management within OPEA's Front Office, PRAD and COLA departments.

**The Office of Management and Administration (OMA)** has been actively working to improve developmental opportunities for its workforce. OMA's FY24 accomplishments include:

- Piloted Emerging Leaders developmental program for GS 13s and 14s. As part of succession planning, OMA will establish career ladder positions to the GS-13 and below for Pathways interns from GS 5 to GS 7 grade level with budget approval.
- Conducted and/or participated in several trainings to include Finding New Leadership Ground – Mature Leadership 101, A Vertical Approach to Transformative Feedback, and Leadership Roundtable: Simon Sinek on Trust & Psychological Safety.
- Collaborated with OEEO on the Affinity Chat Panel Series.
- Participated in a disability etiquette workshop for Pathways Interns.
- Organized an agency-wide Community Day event.
- The Learning and Development Division (LDD) continues to offer professional development and technical training to PBGC's workforce.

**The Office of Benefits Administration (OBA)** commitment to our employees' professional growth and development resulted in a \$425,000 investment which encompassed individual training sessions, conferences, professional certifications, and internal training opportunities, including more than 18 facilitated by PBGC staff and over 30 vendor facilitated offerings. Other opportunities offered included:

- OBA's mentoring program. Employees voluntarily establish mentoring relationships based on several factors - interests, professional goals, career paths and one-on-one interviews. The program is open to all OBA employees to assist with career growth and challenges. This year, OBA did a pilot for a shadowing program which is still under development.
- OBA supervisors continued the employee professional development series by helping employees reach their full performance level. Providing one-on-one coaching, mentoring, and training proved effective and as a result, 25 existing OBA employees were promoted this year.

**The Office of Negotiations and Restructuring (ONR) continued** enhancing employee development and career guidance through collaboration with the Human Resources Department (HRD), OEEEO-sponsored trainings, webinars, and Brown Bag seminars.

- ONR was acknowledged as the #1 Ranked Subcomponent Best Places to Work for the second consecutive year; and achieved consistently high results on the FEVS.
- ONR organized its first annual organizational recognition ceremony and almost 100 employees attended. Four (4) employees were awarded "Length of Service" awards and 35 employees received "Certificates of Appreciation" for their work on Case/Legal Management System projects.
- ONR awarded special act time off, and other non-monetary awards for work on projects, case matters, and actuarial work performed for both the single and multi-employer programs.
- ONR collaborated with HRD on career pathing guidance to enhance developmental opportunities for employees, such as WIGI, Career Ladder Promotions, etc.
- ONR also onboarded 13 external hires. Three (3) students and three (3) Recent Graduates in the Pathways Program were hired. ONR converted three (3) students from the Pathways Recent Graduates/Intern Program to permanent positions within PCD; and one (1) student from the Pathways Recent Graduate Program to a permanent position within PCD.
- The Corporate Finance and Restructuring Department (CFRD) leveraged the Pathways program, converted two (2) student interns to entry level junior Financial Analyst positions at grade levels GS-7 and GS-9; and hired two (2) student pathways interns to backfill those positions. CFRD focused its hiring efforts on more entry level career path positions and fulfilled three (3) additional Financial Analyst vacancies at the GS-9 grade level.

**The Office of The Chief Financial Officer (OCFO)** continued to collaborate with HRD to secure Schedule A hiring authority.

- In FY2024, OCFO converted two (2) Schedule A employees to permanent positions. OCFO hired two (2) additional interns and provided training and mentor opportunities, allowing the interns to get acclimated to PBGC culture, and receive opportunities to engage across interdepartmental teams. During this reporting period, an OCFO student intern graduated in May 2024 and applied for a full-time position as an Accountant. This student intern was hired and converted to a career conditional appointment.
- During this reporting period, OCFO staff members participated in the following training categories: Imposter Syndrome in the Workplace; Empathy in Action: Scoring Your Impact; Resiliency & Energy; Self-Awareness & Emotional Intelligence Workshop; Mentorship: The Silent Key to Career Progression; and the Commemoration of The Passage of The Civil Rights Act of 1964.

**The Office of Information Technology (OIT)** continued working directly with HRD, the Budget Department and OMB for guidance with improving recruitment strategies, hiring and succession planning. Those opportunities included:

- Worked with the Budget Department to increase the number of student interns from 2 student interns to 6 student interns to help support the agency in utilizing the temporary FTEs while also providing eligible students with the opportunity to be exposed to the Federal service as well as the work of PBGC.
- Worked directly with HRD to create career leader opportunities that led to several hires whose career paths increased to higher grade levels than their previously occupied positions where the full performance level (FPL) had been met..
- Members of the management team worked with HRD at Career Fairs at colleges and universities throughout the District of Columbia, Maryland, Virginia and Georgia areas. Schools included but were not limited to Georgia State University, Towson University, Catholic University, University of Maryland (various campuses), Morgan State University, George Mason University and Prince Georges Community College. OIT participated in both Hispanic Association of Colleges and Universities (HACU) and Pathway Intern programs for recruiting and staff development
- Continuing to be innovative regarding group collaborations. OIT holds positions on several mature groups and boards that are instrumental in collaboration and decision making across several mission areas within PBGC. These groups include but are not limited to:
  - Technical Review Board,
  - Information Technology Portfolio Review Board,
  - Cyber Security & Privacy Council
  - PBGC Data Governance Board,

**The Office of the General Counsel (OGC)** continued outreach in recruiting law school graduates. In addition to interviewing at DC area schools, OGC recruiters participated in the Students Association job fairs.

- OGC continued participation in interview programs from several multi-state consortiums, including the Southeastern Law School Consortium (formerly Southeast Minority Job Fair), the Law Consortium, the Midwest-California-Georgia Consortium, and the National Law School Consortium, resulting in onboarding three summer interns.
- OGC onboarded six new Attorneys.

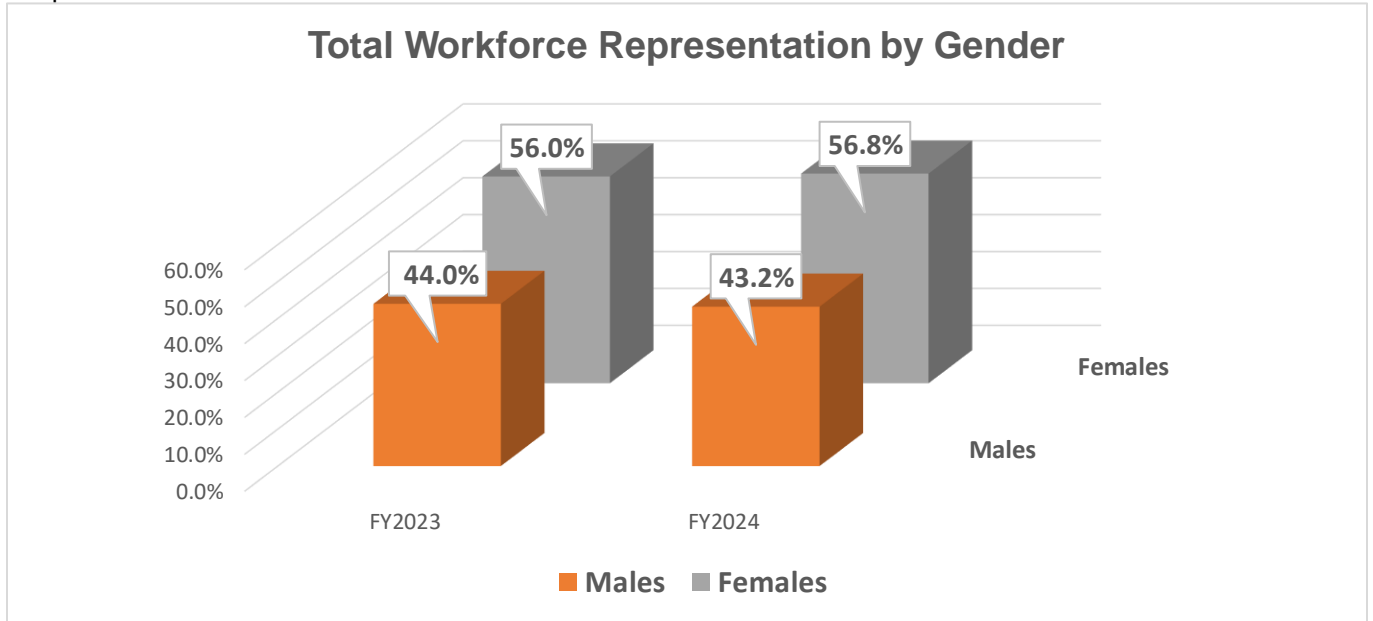
**First Generation Professional Pioneers (FGP)** held training to provide first gen professionals with tools to navigate professional development. Training presented included:

- How to Develop Soft Skills
- The Power of Positive Thinking: How to Create Your Own Goal Board
- How to set Professional Boundaries and Respond to Criticism.
- The Importance of Self-Reflection: Goal Setting

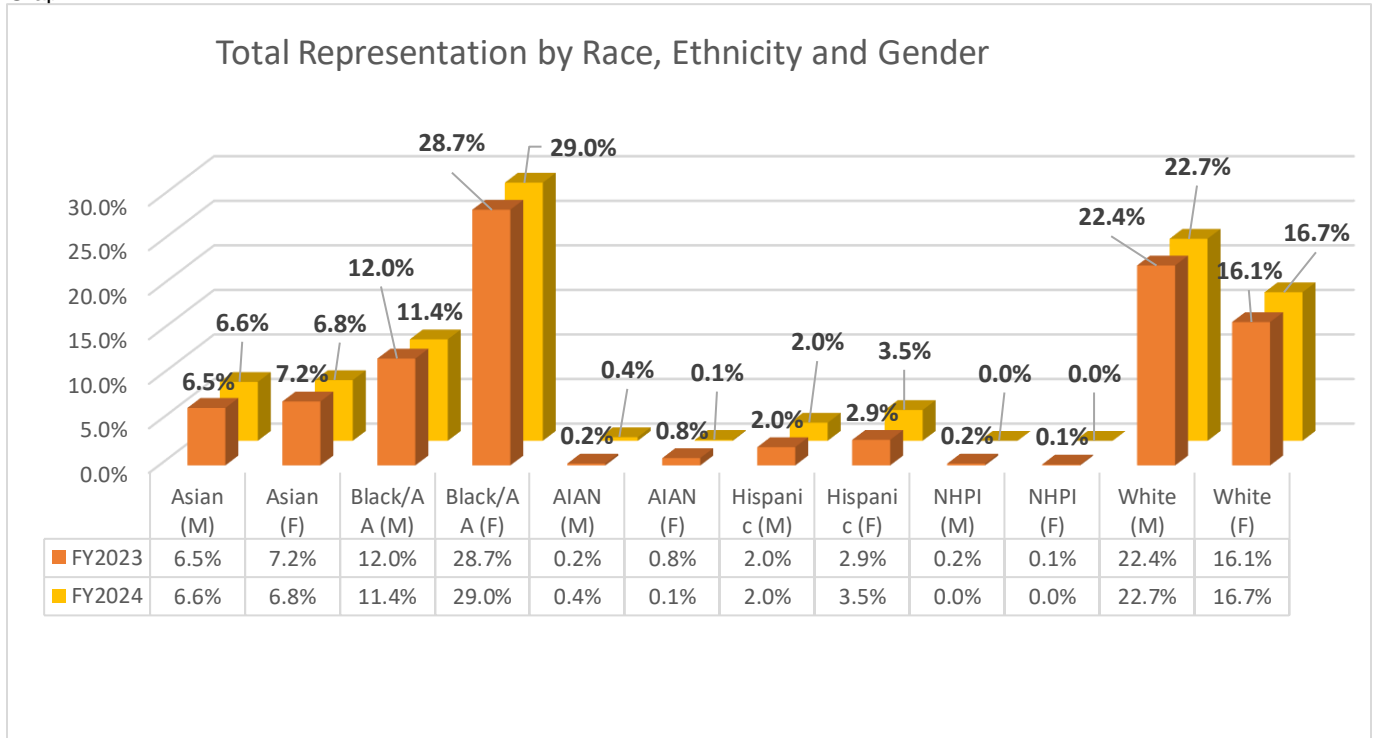
## Workforce Analysis

During the FY 2024 reporting period, PBGC had a total workforce of 984 employees, a net change of 0.99% from the 976 employees during the previous year. The total female workforce representation was 56.80% which is above the Civilian Labor Force (CLF) representation rate of 47.30%. Male employees represented 43.20% of the total workforce and was below the CLF representation rate of 52.70%. The total representation rates for male and female employees, and by race and ethnicity remained consistent over the previous fiscal year.

Graph 1.



Graph 2.



### a. Major Occupation Categories

PBGC's major occupations include Accountant (Series 0510), Auditor (Series 0511), General Attorney (Series 0905), Employee Benefits Law Specialist (Series 0958), Contract Specialist (Series 1102), Financial Analyst (Series 1160), Actuary (Series 1510), and Information Technology Specialist (Series 2210). These occupations represent a significant portion of the PBGC workforce and indicate occupations that typically lead to senior level occupational categories and grade representation. The following graphs represent PBGC's workforce demographics that occupy the major occupations. The data highlighted in yellow indicate that the demographic is below the benchmark's rate of representation. It may also indicate a glass wall effect, i.e., when people within a specific demographic group are unable to obtain employment in major occupations within the agency. It should also be noted that specific demographics under representation does not always mean that a barrier may exist. Likewise, specific demographics over representation does not always mean that equal employment opportunity exists at all levels.

Workforce demographics not reflected in a chart are at or above parity with the benchmark. OEEO will continue to collaborate with PBGC's department leaders, Human Resources, and other stakeholders to develop programs that support equal employment opportunity. The highlighted text indicates representation rate is below the benchmark.

| Asian Male Major Occupation Representation      | FY24 OCLF Benchmark | FY24 PBGC Representation | FY23 OCLF Benchmark | FY23 PBGC Representation |
|---|---------------------|--------------------------|---------------------|--------------------------|
| <b>Accounting (0510)</b>                        | 3.70%               | 8.93%                    | 3.10%               | 8.93%                    |
| <b>Auditing (0511)</b>                          | 3.70%               | 11.20%                   | 3.10%               | 11.57%                   |
| <b>General Attorney (0905)</b>                  | 2.10%               | 1.83%*                   | 1.90%               | 1.90%                    |
| <b>Employee Benefit Law Specialist (0958)</b>   | 1.30%               | 5.00%                    | 1.10%               | 4.76%                    |
| <b>Contract Specialist (1102)</b>               | 2.40%               | 4.76%                    | 1.90%               | 3.85%                    |
| <b>Financial Analyst (1160)</b>                 | 7.70%               | 5.56%*                   | 5.90%               | 0.00%*                   |
| <b>Actuary Science (1510)</b>                   | 7.10%               | 8.00%                    | 4.80%               | 9.09%                    |
| <b>Information Technology Specialist (2210)</b> | 10.80%              | 18.26%                   | 7.00%               | 18.64%                   |

| Asian Female Major Occupation Representation    | FY24 OCLF Benchmark | FY24 PBGC Representation | FY23 OCLF Benchmark | FY23 PBGC Representation |
|---|---------------------|--------------------------|---------------------|--------------------------|
| <b>Accounting (0510)</b>                        | 7.10%               | 14.29%                   | 5.70%               | 14.29%                   |
| <b>Auditing (0511)</b>                          | 7.10%               | 10.40%                   | 5.70%               | 10.74%                   |
| <b>General Attorney (0905)</b>                  | 2.40%               | 8.26%                    | 2.10%               | 8.57%                    |
| <b>Employee Benefit Law Specialist (0958)</b>   | 2.60%               | 5.00%                    | 2.20%               | 4.76%                    |
| <b>Contract Specialist (1102)</b>               | 3.10%               | 9.52%                    | 2.40%               | 7.69%                    |
| <b>Financial Analyst (1160)</b>                 | 6.80%               | 7.41%                    | 5.30%               | 8.70%                    |
| <b>Actuary Science (1510)</b>                   | 7.00%               | 11.00%                   | 5.00%               | 11.11%                   |
| <b>Information Technology Specialist (2210)</b> | 3.30%               | 7.83%                    | 2.60%               | 5.93%                    |

| Black or African American Male Major Occupation Representation | FY24 OCLF Benchmark | FY24 PBGC Representation | FY23 OCLF Benchmark | FY 23 PBGC Representation |
|--|---------------------|--------------------------|---------------------|---------------------------|
| <b>Major Occupation</b>  |                     |                          |                     |                           |
| Accounting (0510)  | 2.80%               | 12.50%                   | 2.70%               | 16.07%                    |
| Auditing (0511)  | 2.80%               | 16.00%                   | 2.70%               | 17.36%                    |
| General Attorney (0905)  | 2.30%               | 0.92%*                   | 2.20%               | 0.95%*                    |
| Employee Benefit Law Specialist (0958)                         | 1.90%               | 15.00%                   | 1.90%               | 14.29%                    |
| Contract Specialist (1102)                                     | 3.30%               | 23.81%                   | 3.30%               | 23.08%                    |
| Financial Analyst (1160)                                       | 3.50%               | 25.93%                   | 3.50%               | 26.09%                    |
| Actuary Science (1510)   | 3.80%               | 9.00%                    | 3.80%               | 9.09%                     |
| Information Technology Specialist (2210)                       | 3.40%               | 11.30%                   | 3.60%               | 12.71%                    |

| Black or African American Female Major Occupation Representation | FY24 OCLF Benchmark | FY24 PBGC Representation | FY23 OCLF Benchmark | FY23 PBGC Representation |
|--|---------------------|--------------------------|---------------------|--------------------------|
| <b>Major Occupation</b>  |                     |                          |                     |                          |
| Accounting (0510)  | 5.70%               | 39.29%                   | 5.70%               | 37.50%                   |
| Auditing (0511)  | 5.70%               | 32.80%                   | 5.70%               | 31.40%                   |
| General Attorney (0905)  | 3.00%               | 10.09%                   | 3.00%               | 10.48%                   |
| Employee Benefit Law Specialist (0958)                           | 6.50%               | 70.00%                   | 6.50%               | 66.67%                   |
| Contract Specialist (1102)                                       | 5.10%               | 14.29%                   | 5.20%               | 11.54%                   |
| Financial Analyst (1160)   | 4.00%               | 11.11%                   | 4.10%               | 10.87%                   |
| Actuary Science (1510)   | 5.40%               | 8.00%                    | 5.70%               | 8.08%                    |
| Information Technology Specialist (2210)                         | 2.30%               | 20.87%                   | 2.50%               | 19.49%                   |

| Hispanic or Latino Male Major Occupation Representation | FY24 OCLF Benchmark | FY24 PBGC Representation | FY23 OCLF Benchmark | FY23 PBGC Representation |
|---|---------------------|--------------------------|---------------------|--------------------------|
| <b>Major Occupation</b>                                 |                     |                          |                     |                          |
| Accounting (0510)                                       | 2.90%               | 1.79%*                   | 2.70%               | 1.79%*                   |
| Auditing (0511)   | 2.90%               | 0.80%                    | 2.70%               | 0.00%*                   |
| General Attorney (0905)                                 | 3.20%               | 3.67%                    | 3.10%               | 3.81%                    |
| Employee Benefit Law Specialist (0958)                  | 3.00%               | 0.00%*                   | 2.70%               | 0.00%*                   |
| Contract Specialist (1102)                              | 4.70%               | 4.76%                    | 4.30%               | 3.85%*                   |
| Financial Analyst (1160)                                | 3.90%               | 1.85%*                   | 3.60%               | 2.17%*                   |
| Actuary Science (1510)                                  | 3.50%               | 3.00%*                   | 3.60%               | 3.03%*                   |
| Information Technology Specialist (2210)                | 4.70%               | 2.61%*                   | 4.50%               | 2.54%*                   |

| Hispanic or Latino Female Major Occupation Representation | FY24 OCLF Benchmark | FY24 PBGC Representation | FY23 OCLF Benchmark | FY 23 PBGC Representation |
|---|---------------------|--------------------------|---------------------|---------------------------|
| <b>Major Occupation</b>                                   |                     |                          |                     |                           |
| Accounting (0510)   | 5.30%               | 0.00%*                   | 5.10%               | 0.00%*                    |
| Auditing (0511)   | 5.30%               | 7.20%                    | 5.10%               | 5.79%                     |
| General Attorney (0905)                                   | 2.60%               | 3.67%                    | 2.50%               | 2.86%                     |
| Employee Benefit Law Specialist (0958)                    | 11.20%              | 0.00%*                   | 10.70%              | 0.00%*                    |
| Contract Specialist (1102)                                | 4.90%               | 4.76%*                   | 4.60%               | 0.00%*                    |
| Financial Analyst (1160)                                  | 3.40%               | 0.00%*                   | 3.30%               | 0.00%*                    |
| Actuary Science (1510)                                    | 3.40%               | 1.00%*                   | 3.50%               | 1.01%*                    |
| Information Technology Specialist (2210)                  | 3.20%               | 0.00%*                   | 1.60%               | 0.00%*                    |

| White Male Major Occupation Representation | FY24 OCLF Benchmark | FY24 PBGC Representation | FY23 OCLF Benchmark | FY 23 PBGC Representation |
|--|---------------------|--------------------------|---------------------|---------------------------|
| <b>Major Occupation</b>                    |                     |                          |                     |                           |
| Accounting (0510)                          | 28.80%              | 17.86%*                  | 29.70%              | 14.29%*                   |
| Auditing (0511)                            | 28.90%              | 10.40%*                  | 29.70%              | 11.57%*                   |
| General Attorney (0905)                    | 54.10%              | 34.86%*                  | 54.70%              | 34.29%*                   |
| Employee Benefit Law Specialist (0958)     | 12.90%              | 5.00%*                   | 13.20%              | 9.52%*                    |
| Contract Specialist (1102)                 | 36.10%              | 23.81%*                  | 37.00%              | 19.23%*                   |
| Financial Analyst (1160)                   | 43.80%              | 33.33%*                  | 46.00%              | 34.78%*                   |
| Actuary Science (1510)                     | 37.80%              | 42.00%                   | 40.20%              | 41.41%                    |
| Information Technology Specialist (2210)   | 51.40%              | 26.96%*                  | 54.30%              | 27.12%*                   |

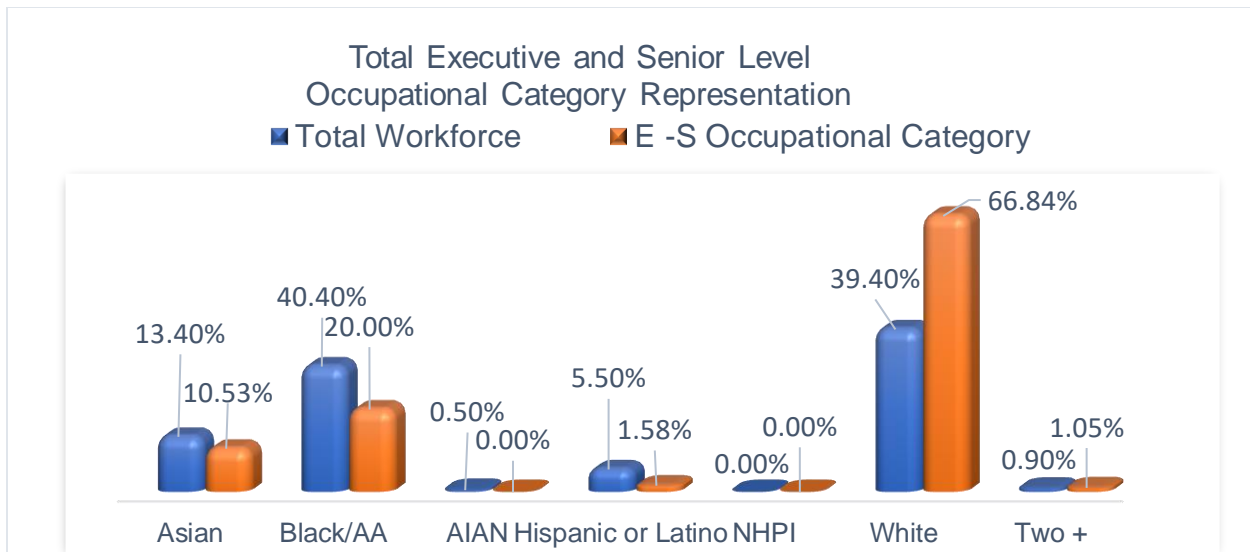
| White Female Major Occupation Representation | FY24 OCLF Benchmark | FY24 PBGC Representation | FY23 OCLF Benchmark | FY23 PBGC Representation |
|--|---------------------|--------------------------|---------------------|--------------------------|
| <b>Major Occupation</b>                      |                     |                          |                     |                          |
| Accounting (0510)                            | 41.50%              | 5.36%*                   | 42.90%              | 5.36%*                   |
| Auditing (0511)                              | 41.50%              | 10.40%*                  | 42.90%              | 9.92%*                   |
| General Attorney (0905)                      | 28.30%              | 36.70%                   | 28.50%              | 37.14%                   |
| Employee Benefit Law Specialist (0958)       | 57.80%              | 0.00%*                   | 58.90%              | 0.00%*                   |
| Contract Specialist (1102)                   | 38.30%              | 14.29%*                  | 39.20%              | 23.08%*                  |
| Financial Analyst (1160)                     | 24.80%              | 12.96%*                  | 26.20%              | 15.22%*                  |
| Actuary Science (1510)                       | 28.70%              | 18.00%*                  | 30.60%              | 17.17%*                  |
| Information Technology Specialist (2210)     | 20.20%              | 9.57%*                   | 21.60%              | 11.02%*                  |

## b. Occupational Categories

### Total Executive and Senior Level Representation

The Executive and Senior Level occupational categories include Executives and Senior level officials. These are the individuals that plan, direct, and formulate policies, set strategy, and provide the overall direction of agency for the development and implementation of services to accomplish the mission. According to current EEOC guidelines, executives comprise grades GS-15 to Senior Leader (SL) positions. The benchmark for this category is PBGC's permanent workforce. An analysis of PBGC's workforce demographic data was conducted and confirmed that there appears to be a glass ceiling effect. Specific demographics are present in the workforce that comprise the feeder pool for this category. However, there is a trigger that those groups may encounter barriers that may prevent them from being promoted to executive-level positions. OEEO will continue to conduct analysis to determine the cause for any anomalies.

Graph 3.

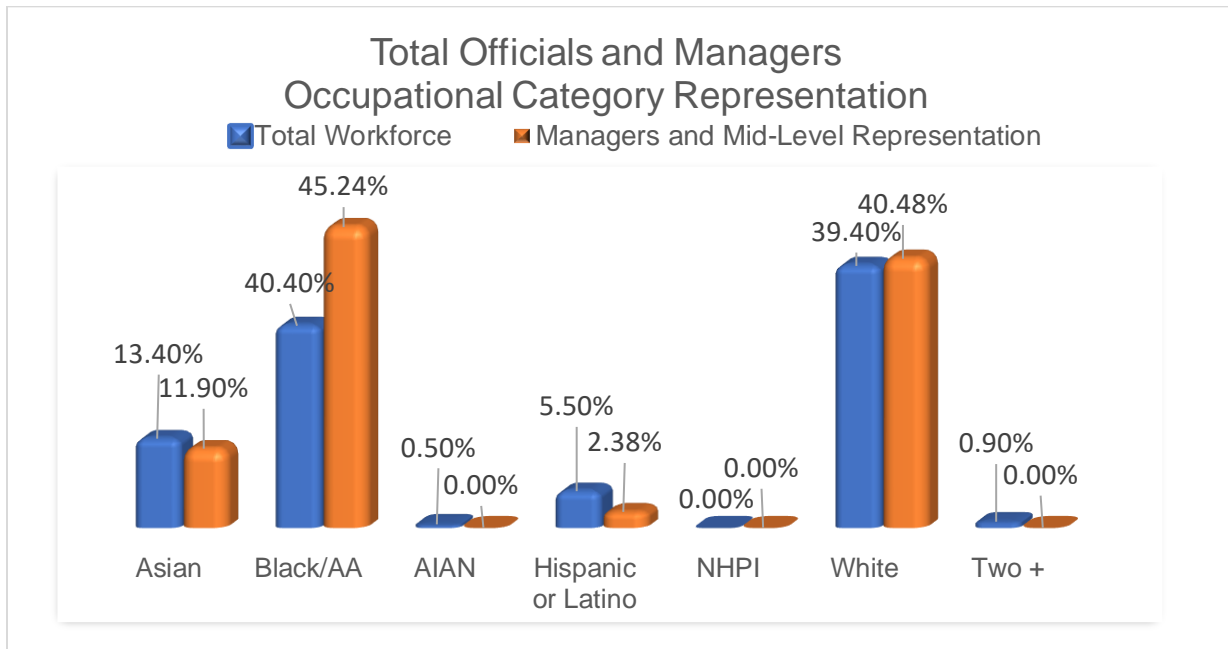


### Total Managers and Mid-Level Representation

The Managers and Mid-level occupational categories include Managers and Supervisors. These are the employees who may either create or implement strategies and plans for a department, a division, or the entire organization. According to current EEOC guidelines, Managers are typically GS-13 and GS-14, while supervisors would be GS-12 and below. The benchmark for this category is PBGC's permanent workforce. An analysis of PBGC's workforce demographic data was conducted and confirmed that there appears to be a glass ceiling effect for specific demographics that are present in the workforce that comprise the feeder pool for this category. However, there is a trigger that those groups may encounter barriers that may prevent them from being promoted to Managers and Mid-Level positions. OEEO will continue to conduct analysis to determine the cause for any anomalies.



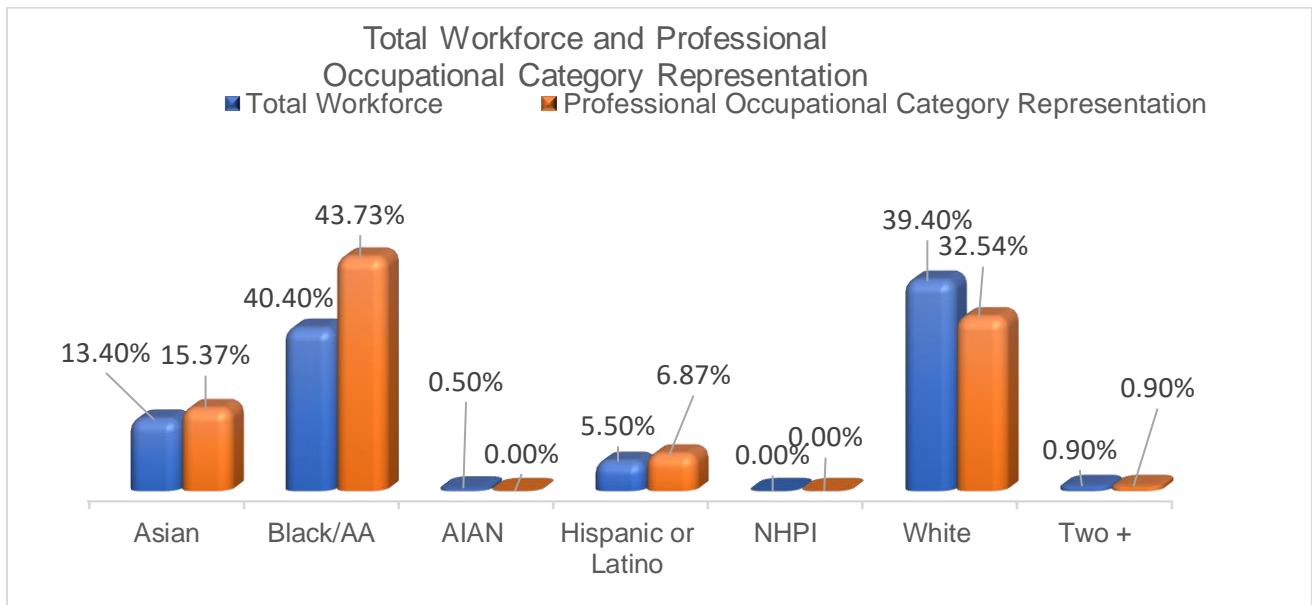
Graph 4.



### Total Professional Representation

The Professionals occupational category typically requires either college graduation or experience of such kind and amount as to provide a comparable background. This category includes roles like accountants, actuaries, auditors, attorneys, and personnel and labor relations specialists. The benchmark for this category is PBGC's permanent workforce. An analysis of PBGC's workforce demographic data was conducted and it was determined that there may be a barrier to access in this category for specific demographics. OEEO will continue to conduct analysis to determine the cause for any anomalies.

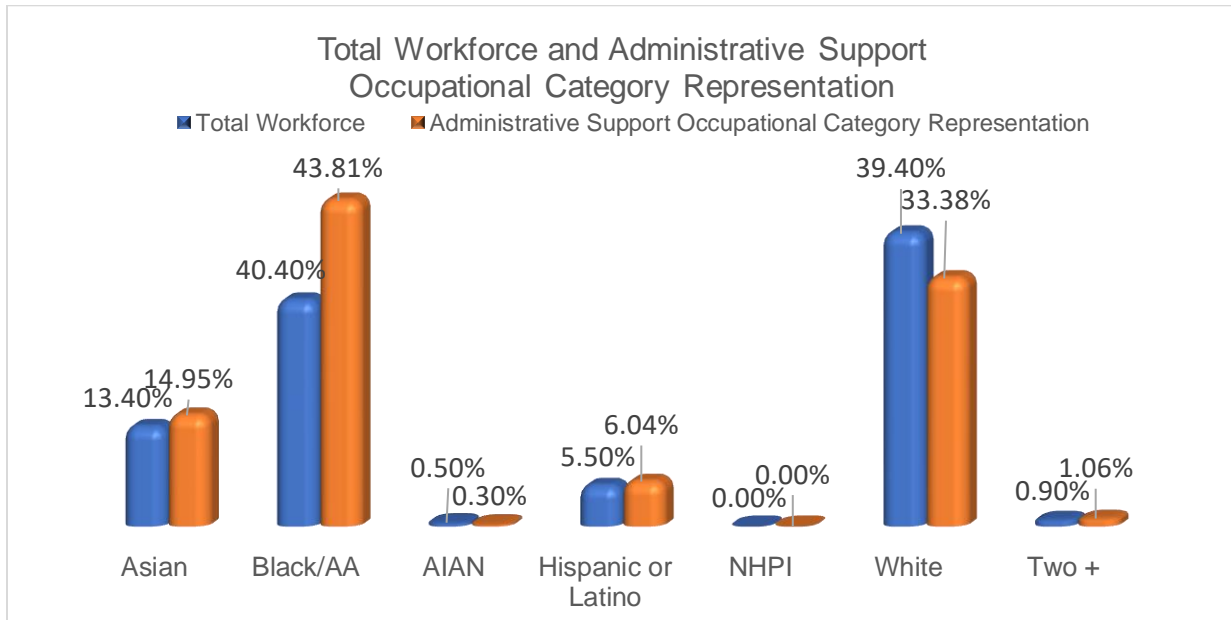
Graph 5.



## Total Administrative Support Workers Representation

The Administrative Support Workers occupational category includes all clerical-type work regardless of the level of difficulty. This category includes roles like administrative officers and employee benefits law specialist. The benchmark for this category is PBGC's permanent workforce and an analysis of PBGC's workforce demographics data was conducted. It was determined that there are anomalies in representation when compared to the benchmarks. OEEO will continue to conduct analysis to determine the cause for any anomalies.

Graph 6.



The following charts identify the specific demographic by race, ethnicity, and gender. Changes to the workforce over a two-year period are also reflected. Workforce demographics not reflected in a chart are at or above parity with the benchmark. The text highlighted\* indicates representation rate is below the benchmark.

| <b>Asian Male Occupational Category</b><br><i>Benchmark 6.6%</i> | <b>FY2024</b> | <b>FY2023</b> |
|--|---------------|---------------|
| <b>Executive</b>   | 4.21%*        | 4.23%*        |
| <b>Officials &amp; Managers</b>                                  | 7.14%         | 9.30%         |
| <b>Professionals</b>   | 7.76%         | 7.40%         |
| <b>Administrative Support</b>                                    | 2.78%*        | 2.86%*        |

| <b>Asian Female Occupational Category</b><br><i>Benchmark 6.8%</i> | <b>FY2024</b> | <b>FY2023</b> |
|--|---------------|---------------|
| <b>Executive</b>   | 6.32%*        | 6.88%         |
| <b>Officials &amp; Managers</b>                                    | 4.76%*        | 6.98%         |
| <b>Professionals</b>   | 7.61%         | 7.55%         |
| <b>Administrative Support</b>                                      | 2.78%*        | 2.86%*        |

| <b>Black or African American Male Occupational Category</b><br><i>Benchmark 11.4%</i> | <b>FY2024</b> | <b>FY2023</b> |
|---|---------------|---------------|
| <b>Executive</b>  | 6.32%*        | 6.35%*        |
| <b>Officials &amp; Managers</b>   | 21.43%        | 23.26%        |
| <b>Professionals</b>  | 12.09%        | 12.99%        |
| <b>Administrative Support</b>   | 11.11%*       | 11.43%        |

| <b>Black or African American Female Occupational Category</b><br><i>Benchmark 29.0%</i> | <b>FY2024</b> | <b>FY2023</b> |
|---|---------------|---------------|
| <b>Executive</b>  | 13.68%*       | 14.81%*       |
| <b>Officials &amp; Managers</b>   | 23.81%*       | 20.93%*       |
| <b>Professionals</b>  | 31.64%        | 30.82%        |
| <b>Administrative Support</b>   | 72.22%        | 74.29%        |

| <b>Hispanic Male Occupational Category</b><br><i>Benchmark 2.0%</i> | <b>FY2024</b> | <b>FY2023</b> |
|---|---------------|---------------|
| <b>Executive</b>  | 0.53%*        | 0.53%*        |
| <b>Officials &amp; Managers</b>                                     | 2.38%         | 2.33%         |
| <b>Professionals</b>  | 2.24%         | 2.11%         |
| <b>Administrative Support</b>                                       | 2.78%         | 2.86%         |

| <b>Hispanic Female Occupational Category</b><br><i>Benchmark 3.5%</i> | <b>FY2024</b> | <b>FY2023</b> |
|---|---------------|---------------|
| <b>Executive</b>  | 1.05%*        | 1.06%*        |
| <b>Officials &amp; Managers</b>                                       | 0.00%*        | 0.00%*        |
| <b>Professionals</b>  | 4.63%         | 3.93%         |
| <b>Administrative Support</b>   | 2.78%*        | 0.00%*        |

| <b>White Male Occupational Category</b><br><i>Benchmark 22.7%</i> | <b>FY2024</b> | <b>FY2023</b> |
|---|---------------|---------------|
| <b>Executive</b>  | 38.95%        | 37.57%        |
| <b>Officials &amp; Managers</b>                                   | 21.43%*       | 20.93%*       |
| <b>Professionals</b>  | 19.55%*       | 19.94%*       |
| <b>Administrative Support</b>                                     | 0.00%*        | 2.86%*        |

| <b>White Female Occupational Category</b><br><i>Benchmark 16.7%</i> | <b>FY2024</b> | <b>FY2023</b> |
|---|---------------|---------------|
| <b>Executive</b>  | 27.89%        | 27.51%        |
| <b>Officials &amp; Managers</b>                                     | 19.05%        | 13.95%*       |
| <b>Professionals</b>  | 12.99%*       | 13.44%*       |
| <b>Administrative Support</b>                                       | 2.78%*        | 0.00%*        |

OEE0 will continue to conduct analysis to identify policies, practices, and procedures that may impact demographic changes and will also continue to collaborate with PBGC’s department leaders, HRD, and other stakeholders to develop programs that support equal employment opportunity.

### c. GS-13 Thru SL Grade Representation

Grade representation continues to be an area that requires continued focus. Gaps in participation rates for specific demographics at GS-14 through SL grade levels require ongoing analysis to identify whether, or to what extent barriers may exist at the various grade levels. Demographics not reflected in a chart are at or above parity. The highlighted\* text indicates representation rate is below the benchmark.

| Asian Male & Female Grade Representation | Asian Males 2024 | Asian Males 2023 | Asian Females 2024 | Asian Females 2023 |
|--|------------------|------------------|--------------------|--------------------|
| <b>PBGC Benchmark</b>                    | <b>6.60%</b>     | <b>6.50%</b>     | <b>6.80%</b>       | <b>7.20%</b>       |
| <b>SL</b>                                | 2.94%*           | 2.86%*           | 2.94%*             | 2.86%*             |
| <b>GS-15</b>                             | 4.49%*           | 4.55%*           | 7.05%              | 7.79%              |
| <b>GS-14</b>                             | 9.22%            | 8.61%            | 6.34%*             | 5.93%*             |
| <b>GS-13</b>                             | 6.49%*           | 6.55%            | 8.23%              | 7.86%              |

| Black or African American Grade Representation | Black or AA Males 2024 | Black or AA Males 2023 | Black or AA Females 2024 | Black or AA Females 2023 |
|--|------------------------|------------------------|--------------------------|--------------------------|
| <b>PBGC Benchmark</b>                          | <b>11.40%</b>          | <b>12.00%</b>          | <b>29.00%</b>            | <b>28.70%</b>            |
| <b>SL</b>                                      | 5.88%*                 | 5.71%*                 | 8.82%*                   | 8.57%*                   |
| <b>GS-15</b>                                   | 6.41%*                 | 6.49%*                 | 14.74%*                  | 16.23%*                  |
| <b>GS-14</b>                                   | 12.10%                 | 13.65%                 | 21.33%*                  | 19.58%*                  |
| <b>GS-13</b>                                   | 12.99%                 | 13.54%                 | 39.39%                   | 38.43%                   |

| Hispanic Male & Female Grade Representation | Hispanic Male 2024 | Hispanic Male 2023 | Hispanic Female 2024 | Hispanic Female 2023 |
|---|--------------------|--------------------|----------------------|----------------------|
| <b>PBGC Benchmark</b>                       | <b>2.00%</b>       | <b>2.00%</b>       | <b>3.50%</b>         | <b>2.90%</b>         |
| <b>SL</b>                                   | 0.00%*             | 0.00%*             | 0.00%*               | 0.00%*               |
| <b>GS-15</b>                                | 0.64%*             | 0.65%*             | 1.28%*               | 1.30%*               |
| <b>GS-14</b>                                | 2.88%              | 2.67%              | 3.17%*               | 2.08%*               |
| <b>GS-13</b>                                | 1.73%*             | 1.31%*             | 5.19%                | 5.24%                |

| White Male & Female Grade Representation | White Males 2024 | White Males 2023 | White Females 2024 | White Females 2023 |
|--|------------------|------------------|--------------------|--------------------|
| <b>PBGC Benchmark</b>                    | <b>22.70%</b>    | <b>22.40%</b>    | <b>16.70%</b>      | <b>16.10%</b>      |
| <b>SL</b>                                | 47.06%           | 45.71%           | 32.35%             | 34.29%             |
| <b>GS-15</b>                             | 37.18%           | 35.71%           | 26.92%             | 25.97%             |
| <b>GS-14</b>                             | 25.65%           | 27.60%           | 18.16%             | 18.69%             |
| <b>GS-13</b>                             | 15.58%*          | 16.59%*          | 8.66%*             | 8.30%*             |

**MD-715 - PART F – CERTIFICATION**

|                                 |  |
|---------------------------------|--|
| <b>EEOC<br/>FORM<br/>715-01</b> | <b>U.S. Equal Employment Opportunity Commission<br/><br/>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b> |
|---------------------------------|--|

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

I, **Hope Fuller, Acting EEO Director, 0260-GS-14** 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. OEEO 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.

**HOPE FULLER** Digitally signed by HOPE FULLER  
Date: 2025.03.18 09:09:20 -04'00' **3/18/2025**  
Signature of Principal EEO Director/Official **Date**  
Certifies that this Federal Agency Annual EEO Program Status  
Report is in compliance with EEO MD-715.

**ALICE  
MARONI** Digitally signed by ALICE  
MARONI  
Date: 2025.03.19 18:08:44  
-04'00' **Date**  
Signature of Agency Head or Agency Head Designee

## 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 "N/A" 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



### 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.



| <br>Compliance Indicator<br><br><br>Measures | A.1 – The agency issues an effective, up to date EEO policy statement.   | Measure Met? (Yes/No/NA) | Comments        | Current Part G Questions |
|--|--|--------------------------|-----------------|--------------------------|
| <b>A.1.a</b>   | Does the agency annually issue a signed and dated EEO policy statement on an 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 comment's column. [see MD-715, II(A)] | Yes                      | August 12, 2024 | A.1.a.2                  |
| <b>A.1.b</b>   | Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 C.F.R. § 1614.101(a)]                                     | Yes                      |                 |                          |





| <br>Compliance Indicator<br><br>Measures | A.2 – The agency has communicated EEO policies and procedures to all employees.   | <b>Measure Met? (Yes/No/NA)</b> | Comments  | Current Part G Questions |
|--|---|---------------------------------|---|--------------------------|
| <b>A.2.a</b>   | Does the agency disseminate the following policies and procedures to all employees:   |                                 |   |                          |
| <b>A.2.a.1</b>   | Anti-harassment policy? [see MD 715, II(A)]   | Yes                             |   |                          |
| <b>A.2.a.2</b>   | Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]  | Yes                             |   |                          |
| <b>A.2.b</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 href="https://pbqcgov.sharepoint.com/EEO/Pages/Staff-Link.aspx">https://pbqcgov.sharepoint.com/EEO/Pages/Staff-Link.aspx</a>   |                          |
| <b>A.2.b.2</b>   | 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 comment's column.                 | Yes                             | <a href="https://www.pbqc.gov/sites/default/files/pbqc-procedures-for-processing-requests-for-reasonable-accommodation.pdf">https://www.pbqc.gov/sites/default/files/pbqc-procedures-for-processing-requests-for-reasonable-accommodation.pdf</a> | A.3.c                    |
| <b>A.2.c</b>   | Does the agency inform its employees about the following topics:  |                                 |   |                          |



| <br>Compliance Indicator<br><br>Measures | A.2 – The agency has communicated EEO policies and procedures to all employees.                                  | Measure Met?<br>(Yes/No/NA) | Comments   | Current Part G Questions |
|--|--|-----------------------------|--|--------------------------|
| A.2.c.1  | EEO complaint process? [see 29 C.F.R. §§ 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. 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 C.F.R. § 1614.203(d)(7)(ii)(C)] If “yes,” please provide how often.    | Yes                         | The Reasonable Accommodation brochure is provided to all employees during 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. |                          |



| <br>Compliance Indicator<br><br>Measures | A.2 – The agency has communicated EEO policies and procedures to all employees.   | <b>Measure Met?<br/>(Yes/No/NA)</b> | <b>Comments</b>   | <b>Current Part G Questions</b> |
|--|---|-------------------------------------|---|---------------------------------|
| <b>A.2.c.4</b>   | 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 conducts quarterly presentations on essential topics. These sessions feature contributions from various agency resources and provide PBGC’s workforce with information on mandatory notices such as Reasonable Accommodations, Anti-Harassment policies, EEO statements, and the No FEAR Act. |                                 |
| <b>A.2.c.5</b>   | Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 C.F.R. § 2635.101(b)] If “yes,” please provide how often.                             | Yes                                 | Notices are consistently displayed on HRD’s intranet site.  | A.3.b                           |



| <br>Compliance Indicator<br><br>Measures | <b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>   | <b>Measure Met?<br/>(Yes/No/NA)</b> | <b>Comments<br/>New Compliance Indicator</b> | <b>Current Part G Questions</b> |
|--|--|-------------------------------------|--|---------------------------------|
| <b>A.3.a</b>   | Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 C.F.R. § 1614.102(a) (9)] If “yes,” provide one or two examples in the comments section. | Yes                                 | EEO Merit Award and Certificates.            |                                 |
| <b>A.3.b</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 C.F.R. 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.

| <br>Compliance Indicator<br><br>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?<br>(Yes/No/NA) | Comments       | Current Part G Questions |
|--|---|-----------------------------|----------------|--------------------------|
| <b>B.1.a</b>   | Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 C.F.R. §1614.102(b)(4)]  | Yes                         |                | B.1.a                    |
| <b>B.1.a.1</b>   | If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.  | N/A                         |                |                          |
| <b>B.1.a.2</b>   | Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 C.F.R. §1614.102(b)(4)]   | Yes                         |                | B.1.d                    |
| <b>B.1.b</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 C.F.R. §1614.102(c)(1); MD-715 Instructions, Sec. I]   | Yes                         |                | B.2.a                    |
| <b>B.1.c</b>   | 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                         | August 6, 2024 | B.2.b                    |



| <br>Compliance Indicator<br><br>Measures | <b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b> | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b> |
|--|--|---------------------------------|-----------------|---------------------------------|
| <b>B.1.d</b>   | 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                             |                 |                                 |



| <br>Compliance Indicator Measures<br> | <b>B.2 – The EEO Director controls all aspects of the EEO program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Compliance Indicator</b> | <b>Current Part G Questions</b> |
|---|--|---------------------------------|--|---------------------------------|
| <b>B.2.a</b>  | 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 C.F.R. §1614.102(c)] | Yes                             |  | B.3.a                           |
| <b>B.2.b</b>  | Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 C.F.R. §1614.102(c)(4)]  | Yes                             |  |                                 |
| <b>B.2.c</b>  | Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]                                      | Yes                             |  |                                 |
| <b>B.2.d</b>  | Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]  | Yes                             |  |                                 |
| <b>B.2.e</b>  | Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 C.F.R. §§ 1614.102(e); 1614.502]   | Yes                             |  | F.3.b                           |
| <b>B.2.f</b>  | Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 C.F.R. §1614.102(c)(2)]   | Yes                             |  |                                 |



| <br>Compliance Indicator Measures<br> | <b>B.2 – The EEO Director controls all aspects of the EEO program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Compliance Indicator</b> | <b>Current Part G Questions</b> |
|---|--|---------------------------------|--|---------------------------------|
| <b>B.2.g</b>  | If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 C.F.R. §§ 1614.102(c)(2) and (c)(3)] | N/A                             |  |                                 |



| <b>Compliance Indicators</b><br> | <b>Measures</b><br><b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>  | <b>Current Part G Questions</b> |
|--|---|---------------------------------|--|---------------------------------|
| <b>B.3.a</b>   | 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)] | No                              | These tasks are conducted at the organizational level. The EEO Director does not participate in recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities for the organizations.  | B.2.c & B.2.d                   |
| <b>B.3.b</b>   | Does the agency's current strategic plan reference EEO principles? [see MD-715, II(B)] If "yes," please identify the EEO principles in the strategic plan in the comment's column.  | Yes                             | PBGC Strategic Goal 3: Maintain High Standards of Stewardship and Accountability: Encourage and support a work environment that encourages employee engagement.<br><br>Foster a high performing workforce drawn from all segments of American society.<br><br>Foster a culture that encourages collaboration, flexibility, and fairness. |                                 |





| <br>Compliance Indicator<br><br>Measures | <b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-----------------|---------------------------------|
| <b>B.4.a</b>   | Pursuant to 29 C.F.R. §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:   |                                 |                 |                                 |
| <b>B.4.a.1</b>   | To conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]   | Yes                             |                 | B.3.b                           |
| <b>B.4.a.2</b>   | To enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]   | Yes                             |                 | B.4.a                           |
| <b>B.4.a.3</b>   | To timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 C.F.R. § 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>B.4.a.4</b>   | 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 comment's column. | Yes                             |                 | B.4.f & B.4.g                   |
| <b>B.4.a.5</b>   | To conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 C.F.R. §1614.102(c)(2)]   | N/A                             |                 | E.1.c                           |
| <b>B.4.a.6</b>   | To publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]   | Yes                             |                 | B.4.c                           |

| <br>Compliance Indicator<br><br>Measures | <b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b>    |
|--|--|---------------------------------|-----------------|------------------------------------|
| <b>B.4.a.7</b>   | 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>B.4.a.8</b>   | To effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 U.S.C. § 7201; 38 U.S.C. § 4214; 5 C.F.R. § 720.204; 5 C.F.R. § 213.3102(t) and (u); 5 C.F.R. § 315.709] | Yes                             |                 | B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3 |
| <b>B.4.a.9</b>   | 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>B.4.a.10</b>  | To effectively manage its reasonable accommodation program? [see 29 C.F.R. § 1614.203(d)(4)(ii)]   | Yes                             |                 | B.4.d                              |
| <b>B.4.a.11</b>  | To ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]   | Yes                             |                 |                                    |
| <b>B.4.b</b>   | Does the EEO office have a budget that is separate from other offices within the agency? [see 29 C.F.R. § 1614.102(a)(1)]  | Yes                             |                 |                                    |
| <b>B.4.c</b>   | 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>B.4.d</b>   | Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?  | Yes                             |                 | E.2.d                              |



| <br>Compliance Indicator<br><br>Measures | <b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-----------------|---------------------------------|
| <b>B.4.e</b>   | 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                           |



| <br>Compliance Indicator<br><br>Measures | <b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b> | <b>Current Part G Questions</b> |
|--|--|---------------------------------|-------------------------------|---------------------------------|
| <b>B.5.a</b>   | Pursuant to 29 C.F.R. § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:  |                                 |                               |                                 |
| <b>B.5.a.1</b>   | EEO Complaint Process? [see MD-715(II)(B)]   | Yes                             |                               |                                 |
| <b>B.5.a.2</b>   | Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]  | Yes                             |                               | A.3.d                           |
| <b>B.5.a.3</b>   | Anti-Harassment Policy? [see MD-715(II)(B)]  | Yes                             |                               |                                 |
| <b>B.5.a.4</b>   | Supervisory, managerial, communication, and interpersonal skills to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)] | Yes                             |                               |                                 |
| <b>B.5.a.5</b>   | 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                           |



| <br>Compliance Indicator<br><br>Measures | <b>B.6 – The agency involves managers in the implementation of its EEO program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-------------------------------|---------------------------------|
| <b>B.6.a</b>   | Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]  | Yes                             |                               |                                 |
| <b>B.6.b</b>   | Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]   | Yes                             |                               | D.1.a                           |
| <b>B.6.c</b>   | 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>B.6.d</b>   | Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 C.F.R. § 1614.102(a)(5)]         | Yes                             |                               | 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.**



| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-----------------|---------------------------------|
| <b>C.1.a</b>   | Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 C.F.R. §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.                  | N/A                             |                 |                                 |
| <b>C.1.b</b>   | Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 C.F.R. §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section. | N/A                             |                 |                                 |
| <b>C.1.c</b>   | 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                             |                 |                                 |



| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b> | <b>Current Part G Questions</b> |
|--|--|---------------------------------|-------------------------------|---------------------------------|
| <b>C.2.a.1</b>   | Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]  | Yes                             |                               |                                 |
| <b>C.2.a.2</b>   | 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                             |                               |                                 |
| <b>C.2.a.3</b>   | 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                             |                               |                                 |
| <b>C.2.a.4</b>   | 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                             |                               |                                 |
| <b>C.2.a.5</b>   | Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dept of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept. of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If “no,” please provide the percentage of timely-processed inquiries in the comment's column. | Yes                             |                               |                                 |



| <br>Compliance Indicator<br><br>Measures | <b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-------------------------------|---------------------------------|
| <b>C.2.a.6</b>   | Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 C.F.R. 1614.203(d)(2)]  | Yes                             |                               |                                 |
| <b>C.2.b</b>   | Has the agency established reasonable disability accommodation procedures that comply with EEOC's regulations and guidance? [see 29 C.F.R. 1614.203(d)(3)]  | Yes                             |                               |                                 |
| <b>C.2.b.1</b>   | 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 C.F.R. 1614.203(d)(3)(D)]   | Yes                             |                               | E.1.d                           |
| <b>C.2.b.2</b>   | Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]   | Yes                             |                               |                                 |
| <b>C.2.b.3</b>   | Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 C.F.R. 1614.203(d)(1)(ii)(B)]  | Yes                             |                               |                                 |
| <b>C.2.b.4</b>   | 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 C.F.R. 1614.203(d)(3)(i)(M)] | Yes                             |                               |                                 |



| <br>Compliance Indicator<br><br>Measures | <b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b>   | <b>Current Part G Questions</b> |
|--|--|---------------------------------|---|---------------------------------|
| <b>C.2.b.5</b>   | 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 comment's column.          | Yes                             |   | E.1.e                           |
| <b>C.2.c</b>   | 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 C.F.R. 1614.203(d)(6)] | Yes                             |   |                                 |
| <b>C.2.c.1</b>   | Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 C.F.R. § 1614.203(d)(5)(v)] If “yes,” please provide the internet address in the comment's column.                           | Yes                             | <a href="https://www.pbgc.gov/sites/default/files/pbgc-procedures-for-processing-requests-for-reasonable-accommodation.pdf">https://www.pbgc.gov/sites/default/files/pbgc-procedures-for-processing-requests-for-reasonable-accommodation.pdf</a> |                                 |







| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-------------------------------|---------------------------------|
| <b>C.3.a</b>   | Pursuant to 29 C.F.R. §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                             |                               |                                 |
| <b>C.3.b</b>   | Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:   |                                 |                               |                                 |
| <b>C.3.b.1</b>   | Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.]  | Yes                             |                               | A.3.a.1                         |
| <b>C.3.b.2</b>   | Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 C.F.R. §1614.102(b)(6)]  | Yes                             |                               | A.3.a.4                         |
| <b>C.3.b.3</b>   | 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                         |
| <b>C.3.b.4</b>   | Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with all employees? [see MD-715 Instructions, Sec. I]  | Yes                             |                               | A.3.a.6                         |
| <b>C.3.b.5</b>   | Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 C.F.R. §1614.102(a)(7)]   | Yes                             |                               | A.3.a.7                         |
| <b>C.3.b.6</b>   | Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 C.F.R. §1614.102(a)(8)]   | Yes                             |                               | A.3.a.8                         |

| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-------------------------------|---------------------------------|
| <b>C.3.b.7</b>   | Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]  | Yes                             |                               |                                 |
| <b>C.3.b.8</b>   | Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]  | Yes                             |                               | A.3.a.2                         |
| <b>C.3.b.9</b>   | 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                             |                               |                                 |
| <b>C.3.c</b>   | 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 C.F.R. §1614.102(c)(2)] | Yes                             |                               |                                 |
| <b>C.3.d</b>   | When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 C.F.R. §1614.102(c)(2)]   | Yes                             |                               |                                 |

| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> |                       |
|--|---|---------------------------------|-----------------|-----------------------|
| <b>C.4.a</b>   | Does 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 C.F.R. §1614.102(a)(2)]  | Yes                             |                 |                       |
| <b>C.4.b</b>   | Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I] | Yes                             |                 | C.2.a, C.2.b, & C.2.c |
| <b>C.4.c</b>   | 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 C.F.R. §1614.601(a)]   | Yes                             |                 |                       |
| <b>C.4.d</b>   | 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                             |                 |                       |
| <b>C.4.e</b>   | Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:   |                                 |                 |                       |
| <b>C.4.e.1</b>   | Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 C.F.R. §1614.203(d); MD-715, II(C)]  | Yes                             |                 |                       |
| <b>C.4.e.2</b>   | Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]   | Yes                             |                 |                       |



| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b> | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> |  |
|--|---|---------------------------------|-----------------|--|
| <b>C.4.e.3</b>   | Develop and/or provide training for managers and employees? [see MD-715, II(C)]                                   | Yes                             |                 |  |
| <b>C.4.e.4</b>   | Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]                           | Yes                             |                 |  |
| <b>C.4.e.5</b>   | Assist in preparing the MD-715 report? [see MD-715, II(C)]  | Yes                             |                 |  |



| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>  | <b>Current Part G Questions</b> |
|--|---|---------------------------------|--|---------------------------------|
| <b>C.5.a</b>   | Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 C.F.R. § 1614.102(a)(6); see also Douglas v. Veterans Administration, 5 M.S.P.R. 280 (1981)]   | Yes                             |  | C.3.a.                          |
| <b>C.5.b</b>   | When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 C.F.R. §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                           |
| <b>C.5.c</b>   | 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                             |  |                                 |



| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>   | <b>Measure Met?<br/>(Yes/No/NA)</b> | <b>Comments</b>  | <b>Current Part G Questions</b> |
|--|--|-------------------------------------|--|---------------------------------|
| <b>C.6.a</b>   | 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 comment's column. | Yes                                 | EEO provides annual updates to managers and supervisors. | C.1.a                           |
| <b>C.6.b</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.

| <br>Compliance Indicator<br><br>Measures | D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.  | Measure Met?<br>(Yes/No/NA) | Comments<br>New Indicator | Current Part<br>G Questions |
|--|--|-----------------------------|---------------------------|-----------------------------|
| <b>D.1.a</b>   | Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]  | Yes                         |                           |                             |
| <b>D.1.b</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                         |                           |                             |
| <b>D.1.c</b>   | 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 C.F.R. 1614.203(d)(1)(iii)(C)]  | Yes                         |                           |                             |

| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b>   | <b>Current Part G Questions</b> |
|--|---|---------------------------------|---|---------------------------------|
| <b>D.2.a</b>   | Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]   | Yes                             |   |                                 |
| <b>D.2.b</b>   | Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 C.F.R. §1614.102(a)(3)]   | Yes                             |   | B.2.c.2                         |
| <b>D.2.c</b>   | 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 C.F.R. §1614.102(a)(3)]   | Yes                             |   | B.2.c.1                         |
| <b>D.2.d</b>   | Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus 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 comment's column. | Yes                             | The EEO program 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. |                                 |



| <br>Compliance Indicator<br><br>Measures | <b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b> | <b>Current Part G Questions</b> |
|--|--|---------------------------------|-------------------------------|---------------------------------|
| <b>D.3.a.</b>  | Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 C.F.R. §1614.102(a)(3)]                                    | Yes                             |                               |                                 |
| <b>D.3.b</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                             |                               |                                 |
| <b>D.3.c</b>   | Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]  | Yes                             |                               |                                 |



| <br>Compliance Indicator<br><br>Measures | <b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments New Indicator</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-------------------------------|---------------------------------|
| <b>D.4.b</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 C.F.R. 1614.203(d)(1)(i)]  | Yes                             |                               |                                 |
| <b>D.4.c</b>   | Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 C.F.R. 1614.203(d)(1)(ii)(A)]  | Yes                             |                               |                                 |
| <b>D.4.d</b>   | 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 C.F.R. 1614.203(d)(7)(ii)] | Yes                             |                               |                                 |









**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.



| <br>Compliance Indicator<br><br>Measures | E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.  | Measure Met?<br>(Yes/No/NA) | Comments   | Current Part G Questions |
|--|---|-----------------------------|--|--------------------------|
| E.1.a  | Does the agency provide timely EEO counseling, pursuant to 29 C.F.R. §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 C.F.R. §1614.105(b)(1)?  | Yes                         |  | E.1.b                    |
| 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. |                          |



| <br>Compliance Indicator<br><br>Measures | <b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b> |
|--|--|---------------------------------|-----------------|---------------------------------|
| <b>E.1.e</b>   | 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 C.F.R. §1614.102(b)(6)?          | Yes                             |                 |                                 |
| <b>E.1.f</b>   | Does the agency timely complete investigations, pursuant to 29 C.F.R. §1614.108?   | Yes                             |                 | E.3.a.3                         |
| <b>E.1.g</b>   | 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 C.F.R. §1614.108(g)? | Yes                             |                 |                                 |
| <b>E.1.h</b>   | When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 C.F.R. §1614.110(b)?   | Yes                             |                 | E.3.a.4                         |
| <b>E.1.i</b>   | Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 C.F.R. §1614.110(a)?  | Yes                             |                 | E.3.a.7                         |

| <br>Compliance Indicator<br><br>Measures | E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.  | Measure Met?<br>(Yes/No/NA) | Comments   | Current Part G Questions |
|--|---|-----------------------------|--|--------------------------|
| <b>E.1.j</b>   | 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 comment's column. | Yes                         | Yes, the Agency uses contract investigators to conduct EEO discrimination investigation. 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                    |
| <b>E.1.k</b>   | 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                         |  |                          |

| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>                             | <b>Current Part G Questions</b> |
|--|--|---------------------------------|---|---------------------------------|
| <b>E.1.i</b>   | Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 C.F.R. § 1614.403(g)]  | Yes                             |   |                                 |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>E.2 – The agency has a neutral EEO process.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments Revised Indicator</b>           | <b>Current Part G Questions</b> |
| <b>E.2.a</b>   | Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]   | Yes                             |   |                                 |
| <b>E.2.b</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 comment's column. | Yes                             | The OEEEO has an attorney-advisor on staff. | E.6.a                           |
| <b>E.2.c</b>   | 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)]  | N/A                             |   |                                 |
| <b>E.2.d</b>   | 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                           |
| <b>E.2.e</b>   | If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]  | N/A                             |   | E.6.c                           |



| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>                               | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-----------------|---------------------------------|
| <b>E.3.a</b>   | Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 C.F.R. §1614.102(b)(2)] | Yes                             |                 | E.4.a                           |
| <b>E.3.b</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                           |
| <b>E.3.c</b>   | Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]  | Yes                             |                 | D.2.a                           |
| <b>E.3.d</b>   | 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                             |                 |                                 |
| <b>E.3.e</b>   | 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                           |
| <b>E.3.f</b>   | Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]  | Yes                             |                 |                                 |

| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b> |
|--|--|---------------------------------|-----------------|---------------------------------|
| <b>E.4.a</b>   | Does the agency have systems in place to accurately collect, monitor, and analyze the following data:  |                                 |                 |                                 |
| <b>E.4.a.1</b>   | 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                           |
| <b>E.4.a.2</b>   | The race, national origin, sex, and disability status of agency employees? [see 29 C.F.R. §1614.601(a)]  | Yes                             |                 | E.5.c                           |
| <b>E.4.a.3</b>   | Recruitment activities? [see MD-715, II(E)]  | Yes                             |                 | E.5.f                           |
| <b>E.4.a.4</b>   | External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]  | Yes                             |                 |                                 |
| <b>E.4.a.5</b>   | The processing of requests for reasonable accommodation? [29 C.F.R. § 1614.203(d)(4)]  | Yes                             |                 |                                 |
| <b>E.4.a.6</b>   | 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                             |                 |                                 |
| <b>E.4.b</b>   | Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]  | Yes                             |                 |                                 |



| <br><b>Compliance Indicator</b><br><br><br><b>Measures</b> | <b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>   | <b>Current Part G Questions</b> |
|--|--|---------------------------------|---|---------------------------------|
| <b>E.5.a</b>   | 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                           |
| <b>E.5.b</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 searches EEOC’s website, gathers information from other federal agencies and also public entities regarding their best practices and seeks to implement relevant best practices when identified and appropriate. | E.5.g                           |
| <b>E.5.c</b>   | 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.**

| <br>Compliance Indicator<br><br>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 | Current Part G Questions |
|--|--|--------------------------|----------|--------------------------|
| <b>F.1.a</b>   | 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 C.F.R. §1614.102(e); MD-715, II(F)]                  | Yes                      |          | F.1.a                    |
| <b>F.1.b</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                  |
| <b>F.1.c</b>   | 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                  |
| <b>F.1.d</b>   | Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]   | Yes                      |          | F.2.a.2                  |
| <b>F.1.e</b>   | 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<br> Measures | <b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments Indicator moved from E-III Revised</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|--|---------------------------------|
| <b>F.2.a</b>   | Does the agency respond timely and fully comply with EEOC orders? [see 29 C.F.R. §1614.502; MD-715, II(E)]  | Yes                             |  | C.3.d                           |
| <b>F.2.a.1</b>   | When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 C.F.R. §1614.108(g)]                           | Yes                             |  | E.3.a.5                         |
| <b>F.2.a.2</b>   | 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 C.F.R. §1614.501] | Yes                             |  | E.3.a.7                         |
| <b>F.2.a.3</b>   | When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 C.F.R. §1614.403(e)]                              | Yes                             |  |                                 |
| <b>F.2.a.4</b>   | Pursuant to 29 C.F.R. §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?   | Yes                             |  | F.3.d (1 to 9)                  |

|  Compliance Indicator<br> Measures | <b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b> | <b>Current Part G Questions</b> |
|--|---|---------------------------------|-----------------|---------------------------------|
| <b>F.3.a</b>   | 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                             |                 |                                 |
| <b>F.3.b</b>   | Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 C.F.R. §1614.703(d)]                  | Yes                             |                 |                                 |

## 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. The following chart reflects the percentage met for each essential element of a model EEO program over the past fiscal year. It should be noted that each element does not have the same number of self-assessment questions, resulting in varying percentage points.

| Element  | FY 2024                |            | FY 2023                |            |
|--|------------------------|------------|------------------------|------------|
|  | Number of Deficiencies | Percentage | Number of Deficiencies | Percentage |
| <b>A - Demonstrated Leadership Commitment</b>      | 0                      | 100%       | 0                      | 100%       |
| <b>B - Integration of EEO in Strategic Mission</b> | 1                      | 97%        | 1                      | 97%        |
| <b>C - Management &amp; Program Accountability</b> | 0                      | 100%       | 1                      | 98%        |
| <b>D - Proactive Discrimination Prevention</b>     | 0                      | 100%       | 0                      | 100%       |
| <b>E - Efficiency</b>                              | 0                      | 100%       | 1                      | 97%        |
| <b>F - Responsive &amp; Legal Compliance</b>       | 0                      | 100%       | 0                      | 100%       |
| <b>Summary Score</b>                               |                        | 99.5%      |                        | 98.6%      |

The deficiencies identified in elements B stem from the following question being answered in the negative.

***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?***

These tasks are conducted at the organizational level. The EEO Director does not participate in recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities for the organizations.

## Essential Elements A - F

### Essential Element A: Demonstrated Commitment from Agency Leadership

- ❖ The EEO Director meets with the Agency Head to discuss EEO programs and initiatives throughout the year.
- ❖ The State of the Agency's MD-715 briefing was delivered to the Agency Head and Senior Leadership on August 06, 2024.
- ❖ Organizational leadership continues to collaborate with OEEEO in assisting with their EEO efforts.
- ❖ OEEEO collaborated with OGC and HRD to present supervisors/managers with EEO, Harassment and Reasonable Accommodation training.

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

- ❖ PBGC's Strategic Plan continues to include objectives to employ a highly performing workforce and to encourage and support a work environment that encourages employee engagement.
- ❖ PBGC continued collaborative departmental partnerships involving OEEEO and HRD to support integration of EEO principles throughout the Agency's strategic operations.
- ❖ PBGC continued barrier and trends analysis (BATA) on key human capital areas, to include recruitment, hiring, separations, and promotions.

### Essential Element C: Management and Program Accountability

- ❖ PBGC managers and supervisors are evaluated on their commitment to PBGC's EEO principles.
- ❖ PBGC has policies discouraging offensive conduct before it rises to the level of discriminatory harassment. Employees are encouraged to report offensive, unwanted conduct.
- ❖ In FY 2024, OGC and HRD jointly evaluated 17 reports of potential harassment and conducted inquiries as appropriate through the Agency's HIC.
- ❖ PBGC has an annual mandatory reasonable accommodation training requirement for all supervisors and managers and delivered virtual training sessions on this topic.
- ❖ 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 intranet content, all PBGC emails, and policy statements.
- ❖ The Agency conducted virtual training for PBGC managers and staff in the areas of EEO, anti-harassment, reasonable accommodation, and section 508 Compliance.

### Essential Element E: Efficiency

- ❖ The Agency offers early resolution of complaints with the use of alternative dispute resolution (ADR) as an alternative 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 2024, ADR was offered 4 times. Of the 4 offers, 2 accepted.
- ❖ PBGC received and processed 13 formal complaints alleging employment discrimination in FY 2024.

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

The 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.

For FY 2024, PBGC received and processed 13 formal complaints alleging employment discrimination.

The Agency successfully processed 18 informal complaints, all within regulatory timeframes (including ADR and written extensions).

The following reflects PBGC's formal complaint activity in FY 2024.

- ❖ 13 formal complaints were filed in FY 2024.
- ❖ 13 Complaints were closed during FY 2024.
- ❖ Agency issued all FADs timely.
- ❖ Investigations were completed within an average completion time of 157 days, well in advance of the 180-day requirement.

## 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   |
|---|---|
| <b>B - Integration of EEO Into Agency's Strategic Mission</b> | EEO Director is not included 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. |

#### Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective  | Target Date (mm/dd/yy yy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|-----------------------------|--|---------------------------|----------------------------|-----------------------------|
| 10/01/2022                  | To include EEO Director in meetings that involve strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities. | 09/30/2027                | 09/30/2024                 | NA                          |

#### Responsible Official(s)

| Title                    | Name            | Performance Standards Address the Plan? (Yes or No) |
|--------------------------|-----------------|---|
| Chief Management Officer | Alice Maroni    | No  |
| Human Capital Director   | Arrie Etheridge | No  |
| OEEEO Director           | Brenecia Watson | No  |
| Departmental Leadership  | Various         | 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) |
|--------------------------|--|--|----------------------------|------------------------------|
| 09/30/2024               | OEEO to schedule meeting with HR Director to propose that they meet semiannually to discuss PBGC's recruitment strategy & succession planning efforts. | Yes  | 10/01/2023                 | 09/30/2024                   |
| 09/30/2027               | OEEO Director to schedule quarterly check-ins with Department leaders to discuss departmental recruitment strategy & succession planning efforts.      | Yes  | NA                         | Ongoing                      |

## Report of Accomplishments

| Fiscal Year | Accomplishments   |
|-------------|---|
| NA          | Objective initiated in FY2022. Ad hoc meetings with HR Director occur on a needed basis. OEEO Director also participates in PBGC's Director meetings. |

## 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>OEEEO continued to conduct its barrier analysis with the review of FY 2024 MD-715 workforce data tables. Data indicates that both male and female Hispanic employees experience representation below the benchmark in occupational categories, major occupations and grade representation.</p> <p>Compared to the National Civilian Labor Force (NCLF), Hispanic employees continue to 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"> <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>3.50%</td> <td><b>5.50%</b></td> </tr> <tr> <td>NCLF</td> <td>6.82%</td> <td>6.16%</td> <td><b>12.98%</b></td> </tr> </tbody> </table> |               | Males | Females | Total | PBGC | 2.00% | 3.50% | <b>5.50%</b> | NCLF | 6.82% | 6.16% | <b>12.98%</b> |
|  | Males                         | Females   | Total         |       |         |       |      |       |       |              |      |       |       |               |
| PBGC   | 2.00%                         | 3.50%   | <b>5.50%</b>  |       |         |       |      |       |       |              |      |       |       |               |
| NCLF   | 6.82%                         | 6.16%   | <b>12.98%</b> |       |         |       |      |       |       |              |      |       |       |               |
|  |                               |   |               |       |         |       |      |       |       |              |      |       |       |               |
|  |                               |   |               |       |         |       |      |       |       |              |      |       |       |               |

### 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?<br>(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)                        | Yes                             | Harassment Inquiry Committee demographics and Employee and Labor Relations   |
| 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?<br>(Yes or No) | Barrier(s) Identified?<br>(Yes or No) |
|--|---------------------------------------|
| No. Efforts are ongoing.                           | No                                    |

## Statement of Identified Barrier(s)

| Description of Policy, Procedure, or Practice  |
|--|
| A workforce data analysis has not identified a PBGC policy, practice, procedure, or condition that causes any barrier to exist for Hispanic employees in the hiring/selections processes for PBGC's mission-critical occupations and representation at the GS-15 and SL grade level. |



## Objective(s) and Dates for EEO Plan

| Objective   | Date Initiated  | Target Date        | Sufficient Funding & Staffing?<br>(Yes or No) | Modified Date   | Date Completed      |
|---|-----------------|--------------------|---|-----------------|---------------------|
| OEEEO, HRD, and LDD will continue to provide training opportunities to PBGC's workforce and collaborate with management and staff to investigate red flags and develop effective strategies and action plans. OEEEO will continue to provide recommendations to organizational management to mitigate identified red flags before they become barriers. | October 1, 2016 | September 30, 2027 | Yes   | October 1, 2023 | Efforts are ongoing |

## Responsible Official(s)

| Title   | Name    | Performance Standards Address the Plan?<br>(Yes or No) |
|---|---------|--|
| HRD Directors and Staff, PBGC, Department Directors and Management Team | Various | Yes  |

## Planned Activities Toward Completion of Objective

| Target Date        | Planned Activities  | Modified Date      | Completion Date |
|--------------------|---|--------------------|-----------------|
| September 30, 2027 | Continued review of the applicant pool data to identify trends/barriers in hiring and selection of Hispanic employees and continue to investigate data to identify causes that impact Hispanic representation in comparison to the benchmark. | September 30, 2024 | Ongoing         |
| September 30, 2027 | PBGC's HR Department, Learning & Development Division, and OEEO continue to be a source for information regarding career enhancement for all of PBGC's workforce.   | September 30, 2024 | Ongoing         |

| Report of Accomplishments Fiscal Year | Accomplishments  |
|---------------------------------------|--|
| <b>FY 2024</b>                        | OEEO presented workshops focused on issues that impact equal employment opportunity and provided PBGC's workforce with trainings and workshops that support personal accountability.   |
| <b>FY 2024</b>                        | OEEO presented workshops that provided career enhancing information that could be helpful to all demographic groups as they navigate the development of their careers.   |
| <b>FY 2024</b>                        | HRD continued its longstanding partnership with the Hispanic Association of Colleges and Universities (HACU)/National Internship Program with a dedicated HACU Program Coordinator.<br><br>HRD continued to offer a comprehensive leadership development training program for managers and supervisors, at the GS-15 and SL level, with courses focused on effective leadership practices. In FY 2024, HRD added a GS-13 and GS-14 leadership development opportunities. |
| <b>FY 2024</b>                        | PBGC's Learning and Development Division (LDD) continues to create and implement adult learning and development to help facilitate professional development through its high-quality learning opportunities.   |

| Fiscal Year           | Accomplishments   |
|-----------------------|---|
| <p><b>FY 2024</b></p> | <p>Organized and facilitated multiple events, including "Enhancing Collaboration with Deaf, Hard of Hearing, and Oralist Colleagues: Turn on Your Camera When Speaking," and the "Virtual Communication" workshop in collaboration with PBGC's chapter of Toastmasters International. These sessions helped reinforce awareness of in-person and virtual communication.</p> <p>Provided a series of Education &amp; Enrichment programs and training events, including "Self-Awareness and Emotional Intelligence," "Resiliency &amp; Energy," "Empathy Scorecard," and "Creating a Culture of Innovation," promoting professional and personal growth. Other trainings included "Basics of American Sign Language," "EEO for Supervisors and Staff," and "Mastering the Mind: Strategies to Overcome Imposter Syndrome," to support professional skill building and personal development.</p> <p>OEEO collaborated with PBGC's Human Resources Department to present the 'Representation Matters' workshop; delivering multiple workshops to the entire workforce, highlighting the importance of self-identification as it relates to workforce demographics.</p> <p>OEEO's Complaints Branch facilitated organizational training sessions, covering "ABCs of EEO," "Integration of EEO into Your Department," and "Empowering Your Team," reinforcing EEO principles within organizational practices.</p> <p>The Office of Equal Employment Opportunity organized the "60th Anniversary of the Passage of the Civil Rights Act of 1964," commemoration event, to engage employees in important historical discussions.</p> <p>OEEO collaborated with OGC and HRD to present supervisors/managers with EEO, Harassment and Reasonable Accommodation training.</p> <p>Presented the 3-part YOUiversity workshop to enhance personal reflection and professional development.</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.

| Source of the Trigger                             | Specific Workforce Data Table    | Narrative Description of Trigger   |         |           |       |       |    |              |      |       |       |        |              |       |        |         |        |                 |      |       |        |     |              |       |       |        |        |
|---|----------------------------------|--|---------|-----------|-------|-------|----|--------------|------|-------|-------|--------|--------------|-------|--------|---------|--------|-----------------|------|-------|--------|-----|--------------|-------|-------|--------|--------|
| Comparing grade representation to the benchmarks. | A/B1<br>A/B3<br>A/B4-1<br>A/B4-2 | <p>PBGC's workforce is comprised of females at a rate of 56.8% and males at a rate of 43.2%. The representation rates of females indicates that representation below the benchmark in key occupational categories, major occupations, and grade representation exists. The highlighted* text indicates representation rate is below the benchmark:</p> <table border="1"> <thead> <tr> <th></th> <th>Benchmark</th> <th>GS-14</th> <th>GS-15</th> <th>SL</th> </tr> </thead> <tbody> <tr> <td><b>Asian</b></td> <td>6.8%</td> <td>6.3%*</td> <td>7.05%</td> <td>2.94%*</td> </tr> <tr> <td><b>Black</b></td> <td>29.0%</td> <td>21.3%*</td> <td>14.74%*</td> <td>8.82%*</td> </tr> <tr> <td><b>Hispanic</b></td> <td>3.5%</td> <td>3.2%*</td> <td>1.30%*</td> <td>0%*</td> </tr> <tr> <td><b>White</b></td> <td>16.7%</td> <td>18.2%</td> <td>26.92%</td> <td>32.35%</td> </tr> </tbody> </table> <p>Demographics not reflected in the charts are at parity with their benchmark representation.</p> |         | Benchmark | GS-14 | GS-15 | SL | <b>Asian</b> | 6.8% | 6.3%* | 7.05% | 2.94%* | <b>Black</b> | 29.0% | 21.3%* | 14.74%* | 8.82%* | <b>Hispanic</b> | 3.5% | 3.2%* | 1.30%* | 0%* | <b>White</b> | 16.7% | 18.2% | 26.92% | 32.35% |
|   | Benchmark                        | GS-14  | GS-15   | SL        |       |       |    |              |      |       |       |        |              |       |        |         |        |                 |      |       |        |     |              |       |       |        |        |
| <b>Asian</b>                                      | 6.8%                             | 6.3%*  | 7.05%   | 2.94%*    |       |       |    |              |      |       |       |        |              |       |        |         |        |                 |      |       |        |     |              |       |       |        |        |
| <b>Black</b>                                      | 29.0%                            | 21.3%*   | 14.74%* | 8.82%*    |       |       |    |              |      |       |       |        |              |       |        |         |        |                 |      |       |        |     |              |       |       |        |        |
| <b>Hispanic</b>                                   | 3.5%                             | 3.2%*  | 1.30%*  | 0%*       |       |       |    |              |      |       |       |        |              |       |        |         |        |                 |      |       |        |     |              |       |       |        |        |
| <b>White</b>                                      | 16.7%                            | 18.2%  | 26.92%  | 32.35%    |       |       |    |              |      |       |       |        |              |       |        |         |        |                 |      |       |        |     |              |       |       |        |        |

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

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:**

**EEO Group(s) Affected by Trigger**

| EEO Group                           |
|-------------------------------------|
| Asian, Black, and Hispanic females. |

**Barrier Analysis Process**

| Sources of Data                                | Source Reviewed?<br>(Yes or No) | Identify Information Collected   |
|--|---------------------------------|--|
| Workforce Data Tables                          | Yes                             | Female representation in grades, in major occupations, and in Occupational categories.   |
| Complaint Data (Trends)                        | Yes                             | Complainant demographics, bases and Issues reported.   |
| Grievance Data (Trends)                        | Yes                             | Harassment Inquiry Committee demographics and Employee and Labor Relations   |
| 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. (Affinity Chats) |
| 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?<br>(Yes or No) | Barrier(s) Identified?<br>(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?<br>(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   | 09/30/2024    | 09/30/2024     |
| Provide tools and resources to organizational leadership that supports equal employment opportunity programs. | 06/01/2018     | Ongoing     | Yes   | 09/30/2024    | 09/30/2024     |
| Advocate for career development programs that support professional development and growth.                    | 05/01/2019     | Ongoing     | Yes   | 09/30/2024    | 09/30/2024     |

## Responsible Official(s)

| Title   | Name           | Performance Standards Address the Plan?<br>(Yes or No) |
|---|----------------|--|
| HRD Directors and Staff, PBGC, Department Directors and Management Team | Various        | Yes  |
| Acting OEEO Director  | Hope Fuller    | Yes  |
| Acting Complaint Processing Program Manager                             | Jamelah Nesbit | Yes  |

## Planned Activities Toward Completion of Objective

| Target Date        | Planned Activities   | Modified Date      | Completion Date |
|--------------------|--|--------------------|-----------------|
| September 30, 2027 | Continued review of the applicant pool data to identify trends/barriers in hiring and selection of female employees and continue to investigate data to identify causes that impede GS-14 thru SL grades representation in comparison to the benchmarks. | September 30, 2024 | Ongoing         |
| September 30, 2027 | PBGC's HR Department, Learning & Development Division, Affinity Groups, and OEEO continue to be a source of information for career enhancement efforts for all PBGC's workforce.   | September 30, 2024 | Ongoing         |
| September 30, 2027 | OEEO will continue to sponsor workshops regarding proactive career development specifically highlighting best practices that support women's equal employment opportunity efforts.   | September 30, 2024 | Ongoing         |

## Report of Accomplishments

| Fiscal Year           | Accomplishments   |
|-----------------------|---|
| <p><b>FY 2024</b></p> | <p>Organized and facilitated multiple events, including "Enhancing Collaboration with Deaf, Hard of Hearing, and Oralist Colleagues: Turn on Your Camera When Speaking," and the "Virtual Communication" workshop in collaboration with PBGC's chapter of Toastmasters International. These sessions helped reinforce awareness of in-person and virtual communication.</p> <p>Provided a series of Education &amp; Enrichment programs and training events, including "Self-Awareness and Emotional Intelligence," "Resiliency &amp; Energy," "Empathy Scorecard," and "Creating a Culture of Innovation," promoting professional and personal growth. Other trainings included "Basics of American Sign Language," "EEO for Supervisors and Staff," and "Mastering the Mind: Strategies to Overcome Imposter Syndrome," to support professional skill building and personal development.</p> <p>OEEO collaborated with PBGC's Human Resources Department to present the 'Representation Matters' workshop; delivering multiple workshops to the entire workforce, highlighting the importance of self-identification as it relates to workforce demographics.</p> <p>OEEO's Complaints Branch facilitated organizational training sessions, covering "ABCs of EEO," "Integration of EEO into Your Department," and "Empowering Your Team," reinforcing EEO principles within organizational practices.</p> <p>The Office of Equal Employment Opportunity organized the "60th Anniversary of the Passage of the Civil Rights Act of 1964," commemoration event, to engage employees in important historical discussions.</p> <p>OEEO collaborated with OGC and HRD to present supervisors/managers with EEO, Harassment and Reasonable Accommodation training.</p> <p>Presented the 3-part YOUiversity workshop to enhance personal reflection and professional development.</p> |
| <p><b>FY 2024</b></p> | <p>PBGC's Learning and Development Division (LDD) continues to create and implement adult learning and development to help facilitate professional development through its high-quality learning opportunities.</p>   |



## MD-715 – Part J

Special Program Plan for 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. § 1614.203I) 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.

### 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.

- 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.

Cluster GS-1 to GS-10 (PWD) Yes  No

Cluster GS-11 to SES (PWD) Yes  No

PWD reflects a trigger at GS-15 grade level at 6.29% and SL grade level at 8.57% which falls under the 12% benchmark and is reflected in the chart below. Although GS-5 grade level falls under the benchmark, it is typically represented by student interns.

| PWD 12% | Benchmark |
|---------|-----------|
| GS-15   | 6.29%     |
| SL      | 8.57%     |

- 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.

Cluster GS-1 to GS-10 (PWTD) Yes  No

Cluster GS-11 to SES (PWTD) Yes  No

Where there is representation, we have determined there is not a trigger for grade level cluster GS-01 through GS-10.

In the cluster GS-11 to SL, grades GS-11 through GS-14 were also at or above the benchmark. However, GS-15 at 1.26% and SL were below the 2% benchmark and is reflected in the chart below:

| PWTD 2% | Benchmark |
|---------|-----------|
| GS-15   | 1.26%     |
| SL      | 0.00%     |

- 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

1. Has the agency designated sufficiently 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

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

| Disability Program Task   | # of FTE  | Staff by  | Employment Status   | Responsible Official (Name, Title, Office, Email)   |
|---|-----------|-----------|---|---|
|   | Full Time | Part Time | Collateral Duty   |   |
| <b>Processing applications from PWD and PWTD</b>  | 12        | 0         | 0   | Belinda Thomas-Blackwell, Supervisory HR Specialist, HRD; <a href="mailto:Thomas-Blackwell.Belinda@pbgc.gov">Thomas-Blackwell.Belinda@pbgc.gov</a>  |
| <b>Answering questions from the public about hiring authorities that take disability into account</b> | 1         | 0         | 0   | Sandra Payne, Selective Placement Program Coordinator HRD; <a href="mailto:Payne.Sandra@pbgc.gov">Payne.Sandra@pbgc.gov</a>   |
| <b>Processing reasonable accommodation requests from applicants and employees</b>                     | 1         | 0         | 0   | Roderick Duncan, Reasonable Accommodation Coordinator, HRD; <a href="mailto:Duncan.Roderick@pbgc.gov">Duncan.Roderick@pbgc.gov</a>  |
| <b>Section 508 Compliance</b>   | 0         | 0         | Section 508 Compliance Team (9), headed by the Office of Information Technology | Angela Watkins, IT Specialist and Section 508 Compliance Team Chair; <a href="mailto:watkins.angela@pbgc.gov">watkins.angela@pbgc.gov</a>   |
| <b>Architectural Barriers Act Compliance</b>  | 1         | 0         | 0   | Alisa Cottone, Director, Workplace Solutions, WSD; <a href="mailto:Cottone.alisa@pbgc.gov">Cottone.alisa@pbgc.gov</a>   |
| <b>Special Emphasis Program for PWD and PWTD</b>  | 1         | 1         | 0   | Denorse Prince, Special Emphasis Program Manager, HRD; <a href="mailto:prince.denorse@pbgc.gov">prince.denorse@pbgc.gov</a> and Keshawn Draper, Management and Program Assistant, HRD, <a href="mailto:Draper.keshawn@pbgc.gov">Draper.keshawn@pbgc.gov</a> |

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

Staff members attended The Department of Veterans Affairs-VRE training courses on:

- o The Story
- o Special Memorial Day Presentation
- o The Encounter
- o The Rumor Game

## **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 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

1. 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 specialists review the documentation provided and make a determination as to whether the applicant is eligible for veterans' preference and/or the Schedule A hiring authority. The specialists collaborate with the SPPC as necessary.

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

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.

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

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.

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

Yes X

No 0

SPPC incorporated Schedule A Hiring Authority into the PBGC managers and supervisors training. The SPPC made this a mandatory component of the "refresher" virtual reasonable accommodation training.

## B. Plan to Establish Contacts with Disability Employment Organizations

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

The Staffing and Classification Division attends career fairs specifically targeted to disabled veterans, including veterans with targeted disabilities. At the career fairs we discuss hiring opportunities as well as the application process and the various hiring authorities under which the attendees might be eligible. The Disability Program Manager has established a partnership with The Veterans Affairs, Veterans Readiness Employment (VRE) for the Staffing and Classification Division to accept resumes from disabled veterans, including veterans with targeted disabilities and determines which resumes may be referred noncompetitively under one or more hiring authorities.

## 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.

|  |       |      |
|--|-------|------|
| 2. New Hires for Permanent Workforce (PWD) | Yes 0 | No X |
| 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.

3. 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.

|                            |       |      |
|----------------------------|-------|------|
| 4. New Hires for MCO (PWD) | Yes 0 | No X |
| New Hires for MCO (PWTD)   | Yes 0 | No X |

PWDs and PWDTs were identified at rates above 2%, however none were selected. The sample size was limited as there were few hires in all the major occupations.

5. 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.

|                                     |       |      |
|-------------------------------------|-------|------|
| Qualified Applicants for MCO (PWD)  | Yes 0 | No X |
| Qualified Applicants for MCO (PWTD) | Yes 0 | No X |

6. 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.

|                           |       |      |
|---------------------------|-------|------|
| Promotions for MCO (PWD)  | Yes 0 | No X |
| Promotions for MCO (PWTD) | Yes 0 | No X |

## 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.

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

1. Please describe the career development opportunities that the agency provides for 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) Emerging Leaders Program (ELP); (8) training program for new supervisors. PBGC continues to use career ladder promotions as a recruitment strategy to hire at the entry level with development, growth, and promotion potential.

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

| Career Development Opportunities  | Total Participants |               | PWD            |               | PWTD           |               |
|-----------------------------------|--------------------|---------------|----------------|---------------|----------------|---------------|
|                                   | Applicants (#)     | Selectees (#) | Applicants (%) | Selectees (%) | Applicants (%) | Selectees (%) |
| Internship Programs               | 796                | 19            | N/A            | N/A           | N/A            | N/A           |
| Fellowship Programs               | N/A                |               |                |               |                |               |
| Mentoring Programs                | N/A                |               |                |               |                |               |
| Coaching Programs                 | 25                 | 25            | 0              | 0             | 0              | 0             |
| Training Programs                 | N/A                |               |                |               |                |               |
| Detail Programs                   | N/A                |               |                |               |                |               |
| Other Career Development Programs | N/A                |               |                |               |                |               |

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

|                  |       |      |
|------------------|-------|------|
| Applicants (PWD) | Yes 0 | No X |
| Selections (PWD) | Yes 0 | No X |

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

4. 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.

|                   |       |      |
|-------------------|-------|------|
| Applicants (PWTD) | Yes 0 | No X |
| 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.

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

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

|                                   |       |      |
|-----------------------------------|-------|------|
| Other Types of Recognition (PWD)  | Yes 0 | No X |
| 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

|                                     |       |      |
|-------------------------------------|-------|------|
| Qualified Internal Applicants (PWD) | Yes 0 | No X |
| Internal Selections (PWD)           | Yes 0 | No X |

b. Grade GS-15

|                                     |       |      |
|-------------------------------------|-------|------|
| Qualified Internal Applicants (PWD) | Yes 0 | No X |
| Internal Selections (PWD)           | Yes 0 | No X |

c. Grade GS-14

|                                     |       |      |
|-------------------------------------|-------|------|
| Qualified Internal Applicants (PWD) | Yes 0 | No X |
| Internal Selections (PWD)           | Yes 0 | No X |

d. Grade GS-13

|                                     |       |      |
|-------------------------------------|-------|------|
| Qualified Internal Applicants (PWD) | Yes 0 | No X |
| 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

|                                      |       |      |
|--------------------------------------|-------|------|
| Qualified Internal Applicants (PWTD) | Yes 0 | No X |
| Internal Selections (PWTD)           | Yes 0 | No X |

b. Grade GS-15

|                                      |       |      |
|--------------------------------------|-------|------|
| Qualified Internal Applicants (PWTD) | Yes 0 | No X |
| Internal Selections (PWTD)           | Yes 0 | No X |

c. Grade GS-14

|                                      |       |      |
|--------------------------------------|-------|------|
| Qualified Internal Applicants (PWTD) | Yes 0 | No X |
| Internal Selections (PWTD)           | Yes 0 | No X |

d. Grade GS-13

|                                      |       |      |
|--------------------------------------|-------|------|
| Qualified Internal Applicants (PWTD) | Yes 0 | No X |
| 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 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 (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

Qualified Internal Applicants (PWD) Yes 0 No X  
Internal Selections (PWD) Yes 0 No X

b. Managers

Qualified Internal Applicants (PWD) Yes 0 No X  
Internal Selections (PWD) Yes 0 No X

c. Supervisors

Qualified Internal Applicants (PWD) Yes 0 No X  
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

|                                      |       |      |
|--------------------------------------|-------|------|
| Qualified Internal Applicants (PWTD) | Yes 0 | No X |
| Internal Selections (PWTD)           | Yes 0 | No X |

b. Managers

|                                      |       |      |
|--------------------------------------|-------|------|
| Qualified Internal Applicants (PWTD) | Yes 0 | No X |
| Internal Selections (PWTD)           | Yes 0 | No X |

c. Supervisors

|                                      |       |      |
|--------------------------------------|-------|------|
| Qualified Internal Applicants (PWTD) | Yes 0 | No X |
| 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

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.

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

OEEA does not have access to exit interview results. However, we have determined that retirements, resignations for other opportunities, termination in appointments(students), and death contributed to the separation numbers.

### 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. <https://www.pbgc.gov/about/policies/pg/pbgc-web-site-policies-and-procedures#accessibility> and [https://www.pbgc.gov/sites/default/files/eeo\\_complaint\\_process.pdf](https://www.pbgc.gov/sites/default/files/eeo_complaint_process.pdf)

Anyone with an accessibility issue related to navigating the pbgc.gov site should contact the [webmaster@pbgc.gov](mailto:webmaster@pbgc.gov) (Per the [PBGC Website Policies and Procedures](#) and the Accessibility section). Accessibility statement: In compliance with Section 508 of the Rehabilitation Act, 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, the agency shall take appropriate steps to ensure effective communication with applicants, participants, personnel of other Federal entities, and members of the public.

Our accessibility standards: We design our web pages to meet or exceed the Section 508 standards, which are the technical requirements that ensure we're complying with federal Section 508 law. We also conform to the World Wide Web Consortium (W3C, the web's governing body) and their Web Content Accessibility Guidelines (WCAG) 2.0, which can be found on the W3C website. We meet Level AA standards, which means our content is accessible to most people in most circumstances.

Accessibility help, feedback and formal complaints: Email us at [508@pbgc.gov](mailto:508@pbgc.gov) for formal complaints about the accessibility of PBGC.gov or any other PBGC-managed sites you visit.

For general accessibility questions you may contact the agency's Section 508 Program Manager, [Angela Watkins](#).

If you use assistive technology (such as a Braille reader, a screen reader, or TTY) and the format of any material on this website interferes with your ability to access information, please contact us. Our team is available to respond to your questions, comments, or concerns.

When contacting us, please include a description of the problem and any information that isn't accessible the assistive technology you are using, if any; the preferred format in which to receive the material; the web address of the requested material; and your contact information.

Note: TTY/ASCII users may call 711.

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.

Following is the link to information on Architectural Barriers: <http://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 to ensure access to the building for people with disabilities.

PBGC's Section 508 Compliance Team conducts training sessions across the agency to raise awareness of Section 508 responsibilities and continues to promote the motto that "Accessibility is Everyone's Responsibility" via their various events and content houses in the agency's Section 508 Library.

PBGC TechU Learning Series focuses on technology usability by providing hands-on instruction on how to imbed accessibility in official communications content created in Outlook, Word, PowerPoint, Excel and PDF.

The Section 508 Compliance Team conducts to bi-monthly Great Debates and Q&A Sessions, Accessibility Tools User Group (ATUG), which reviews approved technology. The Section 508 Team conducts an annual 5-day Mission Accessible activity in honor of the National Disability Employment Awareness Month (NDEAM) focusing on promoting empathy and educating others on technology support that focuses on the following five categories of disability, Vision, Hearing, Speech, Mobility and Cognitive issues.

## 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.

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

30 working days

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 2024, PBGC received and timely processed 100% (47 out of 47) reasonable accommodation requests.
3. PBGC actively collaborates with 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.
6. PBGC includes information about the Workforce Recruitment Program, and the Reasonable Accommodation Program on its HRD intranet webpage.
7. PBGC has moved to a GSA building. Should accommodation for deaf and hard-of-hearing visitors be requested, we will refer to the Physical Security Department within Workplace Solutions (WSD).
8. PBGC has an annual mandatory reasonable accommodation training requirement for all supervisors and managers and hosted and delivered multiple training sessions.
9. HRD Reasonable Accommodation brochure is provided to all employees during New Employee Orientation (NEO). In addition, the information is available on the intranet via the Employee and Labor Relations Management Division (ELRMD) link entitled "Reasonable Accommodations" on the internet at: [http://www.pbgc.gov/documents/reasonable\\_accom.pdf](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 FY19 and are posted on PBGC's Intranet. PAS training was incorporated into the FY 2024 mandatory RA training for supervisors.

## 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 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 X                  No 0                  N/A 0

3. If the agency has 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.

Pursuant to an order by the EEOC, PBGC was required to post a notice on its intranet regarding the violation of Section 501 of the Rehabilitation Act of 1973. PBGC was also required to provide training to its Human Resources Department Reasonable Accommodation Program Staff.

## 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.

|                     |   |
|---------------------|---|
| <b>Trigger 1</b>    | While there may be a trigger in terms of representation, there has not been an identified barrier to equal employment opportunity. However, as PBGC continues to conduct barrier analysis, it will continue to look for issues that limit EEO for PWD and PWTD. |
| <b>Barrier(s)</b>   | Not Identified  |
| <b>Objective(s)</b> | To increase representation in senior grades, major occupations, and occupational categories of PWDs and PWTDs.  |

| Responsible Official(s)                    | Performance Standards Address the Plan?<br>(Yes or No) |
|--|--|
| <b>HRD and Agency Leadership</b>           | No   |
| <b>Barrier Analysis Process Completed?</b> | Barrier(s) Identified? No                              |
| <b>OEEO</b>                                | Yes  |



| Sources of Data  | Sources Reviewed?<br>(Yes or No) | Identify Information Collected   |
|--|----------------------------------|--|
| <b>Workforce Data Tables</b>   | Yes                              | Representation Rates   |
| <b>Complaint Data (Trends)</b>   | Yes                              | Bases and Issues   |
| <b>Grievance Data (Trends)</b>   | Yes                              | Harassment Inquiry Committee demographics and Employee and Labor Relations |
| <b>Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)</b> | Yes                              | Harassment Inquiry Committee demographics and Employee and Labor Relations |
| <b>Climate Assessment Survey (e.g., FEVS)</b>  | Yes                              | FEVS: Employee Perceptions   |
| <b>Exit Interview Data</b>   | No                               |  |
| <b>Focus Groups</b>  | No                               |  |
| <b>Interviews</b>  | No                               |  |
| <b>Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)</b>                                  | Yes                              | EEOC data on disability findings   |
| <b>Other (Please Describe)</b>   |                                  |  |

| Target Date               | Planned Activities  | Sufficient Staffing & Funding<br>(Yes or No) | Modified Date | Completion Date |
|---------------------------|---|--|---------------|-----------------|
| <b>September 30, 2027</b> | HRD will continue to train and educate on disability topics, including mandatory RA training for managers/supervisors and employees.  | Yes  |               | Ongoing         |
| <b>September 30, 2027</b> | The agency will continue to operate a robust inter-departmental Section 508 Compliance Team and offer hands-on Section 508 accessibility training and awareness to all employees. | Yes  |               | Ongoing         |
| <b>September 30, 2027</b> | OEEO will continue to explore how it can enhance programs for PWD and PWTD.   | Yes  |               | Ongoing         |

| Fiscal Year | Accomplishments   |
|-------------|---|
| FY 2024     | <p>Organized and facilitated multiple events, including "Enhancing Collaboration with Deaf, Hard of Hearing, and Oralist Colleagues: Turn on Your Camera When Speaking," and the "Virtual Communication" workshop in collaboration with PBGC's chapter of Toastmasters International. These sessions helped reinforce awareness of in-person and virtual communication.</p> <p>Provided a series of Education &amp; Enrichment programs and training events, including "Self-Awareness and Emotional Intelligence," "Resiliency &amp; Energy," "Empathy Scorecard," and "Creating a Culture of Innovation," promoting professional and personal growth. Other trainings included "Basics of American Sign Language," "EEO for Supervisors and Staff," and "Mastering the Mind: Strategies to Overcome Imposter Syndrome," to support professional skill building and personal development.</p> <p>OEEO collaborated with PBGC's Human Resources Department to present the 'Representation Matters' workshop; delivering multiple workshops to the entire workforce, highlighting the importance of self-identification as it relates to workforce demographics.</p> <p>OEEO's Complaints Branch facilitated organizational training sessions, covering "ABCs of EEO," "Integration of EEO into Your Department," and "Empowering Your Team," reinforcing EEO principles within organizational practices.</p> <p>The Office of Equal Employment Opportunity organized the "60th Anniversary of the Passage of the Civil Rights Act of 1964," commemoration event, to engage employees in important historical discussions.</p> <p>OEEO collaborated with OGC and HRD to present supervisors/managers with EEO, Harassment and Reasonable Accommodation training.</p> <p>HRD continues to offer disability awareness trainings.</p> <p>Presented the 3-part YOUiversity workshop to enhance personal reflection and professional development.</p> |

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

Not Applicable

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

As a result of the continued training offered by OEE0, HRD and LDD, PBGC's workforce continues to be educated on topics of EEO Compliance, Reasonable Accommodation and professional development to support professional growth and to maintain a model EEO program.

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.

OEE0, HRD and LDD will continue to provide training opportunities to support a model EEO program.

## Appendix

**Fiscal Year 2024 EEO Workforce Data Tables (Parts A&B)**

**Table A1: TOTAL WORKFORCE - Distribution by Race, Ethnicity, and Sex (Participation Rate)**

| Employment Tenure                     | Total | Total Males | Total Females | Hispanic or Latino Male | Hispanic or Latino Female | White Male | White Female | Black or African American Male | Black or African American Female | Asian Male | Asian Female | Native Hawaiian or Other Pacific Islander Male | Native Hawaiian or Other Pacific Islander Female | American Indian or Alaska Native Male | American Indian or Alaska Native Female | Two or More Races Male | Two or More Races Female |
|---------------------------------------|-------|-------------|---------------|-------------------------|---------------------------|------------|--------------|--------------------------------|----------------------------------|------------|--------------|--|--|---------------------------------------|---|------------------------|--------------------------|
| CLF 2014-2018 %                       | 100   | 51.79       | 48.21         | 6.82                    | 6.16                      | 35.65      | 31.82        | 5.7                            | 6.61                             | 2.19       | 2.18         | 0.08   | 0.08   | 0.31                                  | 0.31                                    | 1.05                   | 1.05                     |
| Alternative Benchmark %               | 0     | 0           | 0             | 0                       | 0                         | 0          | 0            | 0                              | 0                                | 0          | 0            | 0  | 0  | 0                                     | 0                                       | 0                      | 0                        |
| <b>TOTAL WORKFORCE</b>                |       |             |               |                         |                           |            |              |                                |                                  |            |              |  |  |                                       |   |                        |                          |
| Total Workforce: Prior FY #           | 976   | 429         | 547           | 20                      | 28                        | 219        | 157          | 117                            | 280                              | 63         | 70           | 0  | 0  | 2                                     | 1                                       | 8                      | 11                       |
| Total Workforce: Prior FY %           | 100   | 43.96       | 56.05         | 2.05                    | 2.87                      | 22.44      | 16.09        | 11.99                          | 28.69                            | 6.46       | 7.18         | 0.00   | 0.00   | 0.21                                  | 0.11                                    | 0.82                   | 1.13                     |
| Total Workforce: Current FY #         | 984   | 425         | 559           | 20                      | 34                        | 223        | 164          | 112                            | 285                              | 65         | 67           | 0  | 0  | 4                                     | 1                                       | 1                      | 8                        |
| Total Workforce: Current FY %         | 100   | 43.20       | 56.81         | 2.04                    | 3.46                      | 22.67      | 16.67        | 11.39                          | 28.97                            | 6.61       | 6.81         | 0.00   | 0.00   | 0.41                                  | 0.11                                    | 0.11                   | 0.82                     |
| Total Workforce: Difference #         | 8     | -4          | 12            | 0                       | 6                         | 4          | 7            | -5                             | 5                                | 2          | -3           | 0  | 0  | 2                                     | 0                                       | -7                     | -3                       |
| Total Workforce: Ratio Change %       | 0.00  | -0.76       | 0.76          | -0.01                   | 0.59                      | 0.23       | 0.58         | -0.60                          | 0.28                             | 0.15       | -0.37        | 0.00   | 0.00   | 0.20                                  | 0.00                                    | -0.71                  | -0.31                    |
| Total Workforce: Net Change %         | 0.82  | -0.93       | 2.20          | 0.00                    | 21.43                     | 1.83       | 4.46         | -4.27                          | 1.79                             | 3.18       | -4.28        | 0.00   | 0.00   | 100.00                                | 0.00                                    | -87.50                 | -27.27                   |
| <b>EMPLOYEE GAINS</b>                 |       |             |               |                         |                           |            |              |                                |                                  |            |              |  |  |                                       |   |                        |                          |
| Total Workforce: New Hires #          | 75    | 32          | 43            | 1                       | 6                         | 20         | 18           | 7                              | 16                               | 3          | 3            | 0  | 0  | 0                                     | 0                                       | 1                      | 0                        |
| Total Workforce: New Hires %          | 100   | 42.67       | 57.34         | 1.34                    | 8.00                      | 26.67      | 24.00        | 9.34                           | 21.34                            | 4.00       | 4.00         | 0.00   | 0.00   | 0.00                                  | 0.00                                    | 1.34                   | 0.00                     |
| <b>EMPLOYEE LOSSES</b>                |       |             |               |                         |                           |            |              |                                |                                  |            |              |  |  |                                       |   |                        |                          |
| Total Workforce: Reduction in Force # | 0     | 0           | 0             | 0                       | 0                         | 0          | 0            | 0                              | 0                                | 0          | 0            | 0  | 0  | 0                                     | 0                                       | 0                      | 0                        |
| Total Workforce: Reduction in Force % | 100   | 0.00        | 0.00          | 0.00                    | 0.00                      | 0.00       | 0.00         | 0.00                           | 0.00                             | 0.00       | 0.00         | 0.00   | 0.00   | 0.00                                  | 0.00                                    | 0.00                   | 0.00                     |
| Total Workforce: Removal #            | 2     | 2           | 0             | 0                       | 0                         | 1          | 0            | 1                              | 0                                | 0          | 0            | 0  | 0  | 0                                     | 0                                       | 0                      | 0                        |
| Total Workforce: Removal %            | 100   | 100.00      | 0.00          | 0.00                    | 0.00                      | 50.00      | 0.00         | 50.00                          | 0.00                             | 0.00       | 0.00         | 0.00   | 0.00   | 0.00                                  | 0.00                                    | 0.00                   | 0.00                     |
| Total Workforce: Resignation #        | 12    | 6           | 6             | 0                       | 0                         | 3          | 3            | 3                              | 2                                | 0          | 1            | 0  | 0  | 0                                     | 0                                       | 0                      | 0                        |
| Total Workforce: Resignation %        | 100   | 50.00       | 50.00         | 0.00                    | 0.00                      | 25.00      | 25.00        | 25.00                          | 16.67                            | 0.00       | 8.34         | 0.00   | 0.00   | 0.00                                  | 0.00                                    | 0.00                   | 0.00                     |
| Total Workforce: Retirement #         | 23    | 15          | 8             | 0                       | 0                         | 9          | 3            | 2                              | 4                                | 3          | 1            | 0  | 0  | 0                                     | 0                                       | 1                      | 0                        |
| Total Workforce: Retirement %         | 100   | 65.22       | 34.79         | 0.00                    | 0.00                      | 39.14      | 13.05        | 8.70                           | 17.40                            | 13.05      | 4.35         | 0.00   | 0.00   | 0.00                                  | 0.00                                    | 4.35                   | 0.00                     |
| Total Workforce: Other Separations #  | 33    | 13          | 20            | 0                       | 0                         | 9          | 7            | 3                              | 9                                | 0          | 4            | 0  | 0  | 0                                     | 0                                       | 1                      | 0                        |
| Total Workforce: Other Separations %  | 100   | 39.40       | 60.61         | 0.00                    | 0.00                      | 27.28      | 21.22        | 9.10                           | 27.28                            | 0.00       | 12.13        | 0.00   | 0.00   | 0.00                                  | 0.00                                    | 3.04                   | 0.00                     |
| Total Workforce: Total Separations #  | 70    | 36          | 34            | 0                       | 0                         | 22         | 13           | 9                              | 15                               | 3          | 6            | 0  | 0  | 0                                     | 0                                       | 2                      | 0                        |
| Total Workforce: Total Separations %  | 100   | 51.43       | 48.58         | 0.00                    | 0.00                      | 31.43      | 18.58        | 12.86                          | 21.43                            | 4.29       | 8.58         | 0.00   | 0.00   | 0.00                                  | 0.00                                    | 2.86                   | 0.00                     |
| <b>PERMANENT WORKFORCE</b>            |       |             |               |                         |                           |            |              |                                |                                  |            |              |  |  |                                       |   |                        |                          |
| Permanent Workforce: Prior FY #       | 933   | 411         | 522           | 17                      | 28                        | 215        | 147          | 112                            | 269                              | 62         | 67           | 0  | 0  | 2                                     | 1                                       | 3                      | 10                       |
| Permanent Workforce: Prior FY %       | 100   | 44.06       | 55.95         | 1.83                    | 3.01                      | 23.05      | 15.76        | 12.01                          | 28.84                            | 6.65       | 7.19         | 0.00   | 0.00   | 0.22                                  | 0.11                                    | 0.33                   | 1.08                     |
| Permanent Workforce: Current FY #     | 939   | 406         | 533           | 18                      | 34                        | 214        | 149          | 106                            | 275                              | 64         | 66           | 0  | 0  | 4                                     | 1                                       | 0                      | 8                        |
| Permanent Workforce: Current FY %     | 100   | 43.24       | 56.77         | 1.92                    | 3.63                      | 22.80      | 15.87        | 11.29                          | 29.29                            | 6.82       | 7.03         | 0.00   | 0.00   | 0.43                                  | 0.11                                    | 0.00                   | 0.86                     |
| Permanent Workforce: Difference #     | 6     | -5          | 11            | 1                       | 6                         | -1         | 2            | -6                             | 6                                | 2          | -1           | 0  | 0  | 2                                     | 0                                       | -3                     | -2                       |
| Permanent Workforce: Ratio Change %   | 0.00  | -0.82       | 0.82          | 0.09                    | 0.62                      | -0.25      | 0.11         | -0.72                          | 0.45                             | 0.17       | -0.16        | 0.00   | 0.00   | 0.21                                  | 0.00                                    | -0.33                  | -0.22                    |
| Permanent Workforce: Net Change %     | 0.65  | -1.21       | 2.11          | 5.89                    | 21.43                     | -0.46      | 1.37         | -5.35                          | 2.24                             | 3.23       | -1.49        | 0.00   | 0.00   | 100.00                                | 0.00                                    | -100.00                | -20.00                   |







**Table B1-1: TOTAL WORKFORCE - Distribution by Disability Status (Participation Rate)**

| Employment Tenure                     | Total | No Disability [05] | Not Identified [01] | Disability [02-03, 06-99] | Targeted Disability | Developmental Disability [02] | Traumatic Brain Injury [03] | Deaf or Serious Difficulty Hearing [19] | Blind or Serious Difficulty Seeing [20] | Missing Extremities [31] | Significant Mobility Impairment [40] | Partial or Complete Paralysis [60] | Epilepsy or Other Seizure Disorders [82] | Intellectual Disability [90] | Significant Psychiatric Disorder [91] | Dwarfism [92] | Significant Disfigure [93] |
|---------------------------------------|-------|--------------------|---------------------|---------------------------|---------------------|-------------------------------|-----------------------------|---|---|--------------------------|--------------------------------------|------------------------------------|--|------------------------------|---------------------------------------|---------------|----------------------------|
| <b>TOTAL WORKFORCE</b>                |       |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Total Workforce: Prior FY #           | 976   | 767                | 72                  | 137                       | 33                  | 1                             | 0                           | 7                                       | 5                                       | 0                        | 1                                    | 1                                  | 4  | 1                            | 13                                    | 0             | 0                          |
| Total Workforce: Prior FY %           | 100   | 78.59              | 7.38                | 14.04                     | 3.39                | 0.11                          | 0.00                        | 0.72                                    | 0.52                                    | 0.00                     | 0.11                                 | 0.11                               | 0.41                                     | 0.11                         | 1.34                                  | 0.00          | 0.00                       |
| Total Workforce: Current FY #         | 984   | 753                | 78                  | 153                       | 35                  | 1                             | 0                           | 8                                       | 6                                       | 0                        | 2                                    | 1                                  | 4  | 1                            | 12                                    | 0             | 0                          |
| Total Workforce: Current FY %         | 100   | 76.53              | 7.93                | 15.55                     | 3.56                | 0.11                          | 0.00                        | 0.82                                    | 0.61                                    | 0.00                     | 0.21                                 | 0.11                               | 0.41                                     | 0.11                         | 1.22                                  | 0.00          | 0.00                       |
| Total Workforce: 501 Goal %           |       |                    |                     | 12.00                     | 2.00                |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Total Workforce: Difference #         | 8     | -14                | 6                   | 16                        | 2                   | 0                             | 0                           | 1                                       | 1                                       | 0                        | 1                                    | 0                                  | 0  | 0                            | -1                                    | 0             | 0                          |
| Total Workforce: Ratio Change %       | 0.00  | -2.06              | 0.55                | 1.51                      | 0.17                | 0.00                          | 0.00                        | 0.10                                    | 0.09                                    | 0.00                     | 0.10                                 | 0.00                               | 0.00                                     | 0.00                         | -0.12                                 | 0.00          | 0.00                       |
| Total Workforce: Net Change %         | 0.82  | -1.82              | 8.34                | 11.68                     | 6.07                | 0.00                          | 0.00                        | 14.29                                   | 20.00                                   | 0.00                     | 100.00                               | 0.00                               | 0.00                                     | 0.00                         | -7.69                                 | 0.00          | 0.00                       |
| <b>EMPLOYEE GAINS</b>                 |       |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Total Workforce: New Hires #          | 75    | 47                 | 5                   | 23                        | 2                   | 0                             | 0                           | 1                                       | 0                                       | 0                        | 1                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: New Hires %          | 100   | 62.67              | 6.67                | 30.67                     | 2.67                | 0.00                          | 0.00                        | 1.34                                    | 0.00                                    | 0.00                     | 1.34                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| <b>EMPLOYEE LOSSES</b>                |       |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Total Workforce: Reduction in Force # | 0     | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Reduction in Force % | 100   | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Removal #            | 0     | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Removal %            | 100   | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Resignation #        | 0     | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Resignation %        | 100   | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Retirement #         | 0     | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Retirement %         | 100   | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Other Separations #  | 0     | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Other Separations %  | 100   | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Total Separations #  | 0     | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Total Separations %  | 100   | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| <b>PERMANENT WORKFORCE</b>            |       |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Permanent Workforce: Prior FY #       | 933   | 735                | 66                  | 132                       | 31                  | 1                             | 0                           | 5                                       | 5                                       | 0                        | 1                                    | 1                                  | 4  | 1                            | 13                                    | 0             | 0                          |
| Permanent Workforce: Prior FY %       | 100   | 78.78              | 7.08                | 14.15                     | 3.33                | 0.11                          | 0.00                        | 0.54                                    | 0.54                                    | 0.00                     | 0.11                                 | 0.11                               | 0.43                                     | 0.11                         | 1.40                                  | 0.00          | 0.00                       |
| Permanent Workforce: Current FY #     | 939   | 720                | 71                  | 148                       | 34                  | 1                             | 0                           | 7                                       | 6                                       | 0                        | 2                                    | 1                                  | 4  | 1                            | 12                                    | 0             | 0                          |
| Permanent Workforce: Current FY %     | 100   | 76.68              | 7.57                | 15.77                     | 3.63                | 0.11                          | 0.00                        | 0.75                                    | 0.64                                    | 0.00                     | 0.22                                 | 0.11                               | 0.43                                     | 0.11                         | 1.28                                  | 0.00          | 0.00                       |
| Permanent Workforce: Difference #     | 6     | -15                | 5                   | 16                        | 3                   | 0                             | 0                           | 2                                       | 1                                       | 0                        | 1                                    | 0                                  | 0  | 0                            | -1                                    | 0             | 0                          |
| Permanent Workforce: Ratio Change %   | 0.00  | -2.10              | 0.49                | 1.62                      | 0.30                | 0.00                          | 0.00                        | 0.21                                    | 0.10                                    | 0.00                     | 0.11                                 | 0.00                               | 0.00                                     | 0.00                         | -0.12                                 | 0.00          | 0.00                       |
| Permanent Workforce: Net Change %     | 0.65  | -2.04              | 7.58                | 12.13                     | 9.68                | 0.00                          | 0.00                        | 40.00                                   | 20.00                                   | 0.00                     | 100.00                               | 0.00                               | 0.00                                     | 0.00                         | -7.69                                 | 0.00          | 0.00                       |
| <b>EMPLOYEE GAINS</b>                 |       |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |





**Table B1-2: TOTAL WORKFORCE - Distribution by Disability Status (Inclusion Rate)**

| Employment Tenure                               | Total | Persons Without Disability | No Disability [05] | Not Identified [01] | Disability [02-03, 06-99] | Targeted Disability | Developmental Disability [02] | Traumatic Brain Injury [03] | Deaf or Serious Difficulty Hearing [19] | Blind or Serious Difficulty Seeing [20] | Missing Extremities [31] | Significant Mobility Impairment [40] | Partial or Complete Paralysis [60] | Epilepsy or Other Seizure Disorders [82] | Intellectual Disability [90] | Significant Psychiatric Disorder [91] | Dwarfism [92] | Significant Disfigure [93] |
|---|-------|----------------------------|--------------------|---------------------|---------------------------|---------------------|-------------------------------|-----------------------------|---|---|--------------------------|--------------------------------------|------------------------------------|--|------------------------------|---------------------------------------|---------------|----------------------------|
| <b>TOTAL WORKFORCE (Participation Rate)</b>     |       |                            |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Total Workforce: Prior FY #                     | 976   | 839                        | 767                | 72                  | 137                       | 33                  | 1                             | 0                           | 7                                       | 5                                       | 0                        | 1                                    | 1                                  | 4  | 1                            | 13                                    | 0             | 0                          |
| Total Workforce: Prior FY %                     | 100   | 85.97                      | 78.59              | 7.38                | 14.04                     | 3.39                | 0.11                          | 0.00                        | 0.72                                    | 0.52                                    | 0.00                     | 0.11                                 | 0.11                               | 0.41                                     | 0.11                         | 1.34                                  | 0.00          | 0.00                       |
| Total Workforce: Current FY #                   | 984   | 831                        | 753                | 78                  | 153                       | 35                  | 1                             | 0                           | 8                                       | 6                                       | 0                        | 2                                    | 1                                  | 4  | 1                            | 12                                    | 0             | 0                          |
| Total Workforce: Current FY %                   | 100   | 84.46                      | 76.53              | 7.93                | 15.55                     | 3.56                | 0.11                          | 0.00                        | 0.82                                    | 0.61                                    | 0.00                     | 0.21                                 | 0.11                               | 0.41                                     | 0.11                         | 1.22                                  | 0.00          | 0.00                       |
| Total Workforce: 501 Goal %                     |       |                            |                    |                     | 12.00                     | 2.00                |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Total Workforce: Difference #                   | 8     | -8                         | -14                | 6                   | 16                        | 2                   | 0                             | 0                           | 1                                       | 1                                       | 0                        | 1                                    | 0                                  | 0  | 0                            | -1                                    | 0             | 0                          |
| Total Workforce: Ratio Change %                 | 0.00  | -1.51                      | -2.06              | 0.55                | 1.51                      | 0.17                | 0.00                          | 0.00                        | 0.10                                    | 0.09                                    | 0.00                     | 0.10                                 | 0.00                               | 0.00                                     | 0.00                         | -0.12                                 | 0.00          | 0.00                       |
| Total Workforce: Net Change %                   | 0.82  | -0.95                      | -1.82              | 8.34                | 11.68                     | 6.07                | 0.00                          | 0.00                        | 14.29                                   | 20.00                                   | 0.00                     | 100.00                               | 0.00                               | 0.00                                     | 0.00                         | -7.69                                 | 0.00          | 0.00                       |
| <b>EMPLOYEE GAINS (Participation Rate)</b>      |       |                            |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Total Workforce: New Hires #                    | 75    | 52                         | 47                 | 5                   | 23                        | 2                   | 0                             | 0                           | 1                                       | 0                                       | 0                        | 1                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: New Hires %                    | 100   | 69.34                      | 62.67              | 6.67                | 30.67                     | 2.67                | 0.00                          | 0.00                        | 1.34                                    | 0.00                                    | 0.00                     | 1.34                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| <b>EMPLOYEE LOSSES (Inclusion Rate)</b>         |       |                            |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Total Workforce: Reduction in Force #           | 0     | 0                          | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Reduction in Force %           | 0.00  | 0.00                       | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Removal #                      | 0     | 0                          | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Removal %                      | 0.00  | 0.00                       | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Resignation #                  | 0     | 0                          | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Resignation %                  | 0.00  | 0.00                       | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Retirement #                   | 0     | 0                          | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Retirement %                   | 0.00  | 0.00                       | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Other Separations #            | 0     | 0                          | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Other Separations %            | 0.00  | 0.00                       | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| Total Workforce: Total Separations #            | 0     | 0                          | 0                  | 0                   | 0                         | 0                   | 0                             | 0                           | 0                                       | 0                                       | 0                        | 0                                    | 0                                  | 0  | 0                            | 0                                     | 0             | 0                          |
| Total Workforce: Total Separations %            | 0.00  | 0.00                       | 0.00               | 0.00                | 0.00                      | 0.00                | 0.00                          | 0.00                        | 0.00                                    | 0.00                                    | 0.00                     | 0.00                                 | 0.00                               | 0.00                                     | 0.00                         | 0.00                                  | 0.00          | 0.00                       |
| <b>PERMANENT WORKFORCE (Participation Rate)</b> |       |                            |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |
| Permanent Workforce: Prior FY #                 | 933   | 801                        | 735                | 66                  | 132                       | 31                  | 1                             | 0                           | 5                                       | 5                                       | 0                        | 1                                    | 1                                  | 4  | 1                            | 13                                    | 0             | 0                          |
| Permanent Workforce: Prior FY %                 | 100   | 85.86                      | 78.78              | 7.08                | 14.15                     | 3.33                | 0.11                          | 0.00                        | 0.54                                    | 0.54                                    | 0.00                     | 0.11                                 | 0.11                               | 0.43                                     | 0.11                         | 1.40                                  | 0.00          | 0.00                       |
| Permanent Workforce: Current FY #               | 939   | 791                        | 720                | 71                  | 148                       | 34                  | 1                             | 0                           | 7                                       | 6                                       | 0                        | 2                                    | 1                                  | 4  | 1                            | 12                                    | 0             | 0                          |
| Permanent Workforce: Current FY %               | 100   | 84.24                      | 76.68              | 7.57                | 15.77                     | 3.63                | 0.11                          | 0.00                        | 0.75                                    | 0.64                                    | 0.00                     | 0.22                                 | 0.11                               | 0.43                                     | 0.11                         | 1.28                                  | 0.00          | 0.00                       |
| Permanent Workforce: Difference #               | 6     | -10                        | -15                | 5                   | 16                        | 3                   | 0                             | 0                           | 2                                       | 1                                       | 0                        | 1                                    | 0                                  | 0  | 0                            | -1                                    | 0             | 0                          |
| Permanent Workforce: Ratio Change %             | 0.00  | -1.62                      | -2.10              | 0.49                | 1.62                      | 0.30                | 0.00                          | 0.00                        | 0.21                                    | 0.10                                    | 0.00                     | 0.11                                 | 0.00                               | 0.00                                     | 0.00                         | -0.12                                 | 0.00          | 0.00                       |
| Permanent Workforce: Net Change %               | 0.65  | -1.24                      | -2.04              | 7.58                | 12.13                     | 9.68                | 0.00                          | 0.00                        | 40.00                                   | 20.00                                   | 0.00                     | 100.00                               | 0.00                               | 0.00                                     | 0.00                         | -7.69                                 | 0.00          | 0.00                       |
| <b>EMPLOYEE GAINS (Participation Rate)</b>      |       |                            |                    |                     |                           |                     |                               |                             |   |   |                          |                                      |                                    |  |                              |                                       |               |                            |





# EEO Policy Statement



445 12th Street SW  
Washington, DC 20024-2101  
202-229-4000  
PBGC.gov

**February 6, 2025**

**TO:** All PBGC Staff  
**FROM:** Ann Y. Orr  
Acting Director  
**SUBJECT:** Equal Employment Opportunity Policy Statement

ANN ORR  
Digitally signed by ANN ORR  
Date: 2025.02.07 13:46:29 -05'00'

The Pension Benefit Guaranty Corporation (PBGC) protects the retirement incomes of nearly 33 million American workers. For PBGC to do its job well, we must continue to strive for cooperation, and respect for the positive outcomes a talented workforce can bring to any successful venture.

The core mission of the Equal Employment Opportunity Commission (EEOC or the Commission) is to prevent and remedy discrimination in America's workplaces and advance equal employment opportunity (EEO) for all. PBGC is committed to adhering to the laws that the Commission enforces. PBGC's EEO Policy Statement is published as a reminder that all PBGC employees and applicants for employment are protected and covered by federal laws and Presidential Executive Orders designed to safeguard federal employees and job applicants from discrimination. The Agency's policy further ensures that its employees and applicants for employment are treated fairly in an environment that is free from discrimination based on race, color, national origin, sex (including pregnancy, sexual harassment and non-sexual harassment based on sex), religion, age (40 and over), disability (mental or physical), family medical history, genetic information, and reprisal. PBGC's policy statement also protects against harassment based on parental and marital status. PBGC will not tolerate workplace harassment or reprisal against anyone who engages in protected activity. Employees and applicants who believe they have experienced discrimination on any of these bases, or who believe they may have been retaliated against for exercising the right to go through the EEO process, should contact the Office of Equal Employment Opportunity (OEEO) as discussed below.

PBGC employees and applicants are also protected against retaliation. Consistent with federal laws, acts of retaliation against an employee who engages in protected activity, such as reporting discrimination or harassment or participating in the EEO process, whistleblowing, or the exercise of any appeal or grievance right provided by law will not be tolerated at PBGC. PBGC will take swift action when a PBGC employee, agent of PBGC, or non-employee is found to have engaged in discrimination, retaliation, or harassment (including sexual harassment).

All employees will have the freedom to compete on a fair and level playing field. EEO protections extend to all personnel/employment programs, and management practices/decisions,

including, but not limited to, recruitment and hiring, appraisal systems, merit promotions, training, career development programs, transfers, reassignments, benefits, and separations.

PBGC provides reasonable accommodations to employees and applicants with disabilities and for sincerely held religious beliefs, observances, and practices.

All employees are responsible for exhibiting professional conduct and behavior in the workplace and cooperating in the enforcement of this policy. Individuals engaging in conduct or behavior that violates this policy may be subject to appropriate disciplinary action up to, and including, removal from Federal service. Collectively, we must be diligent in maintaining a workplace free from discrimination and take the responsibility to ensure that our Agency continues to be a model employer. Our goal is to be a model workplace through the implementation of PBGC's EEO Policy and full cooperation with its enforcement.

PBGC employees or applicants who believe they have been subjected to discrimination, harassment, or retaliation should contact OEEA at 202-229-4363 or email [all-eeo-federal@pbgc.gov](mailto:all-eeo-federal@pbgc.gov). If you decide to initiate the EEO complaint process, you must do so within 45 calendar days of the incident you felt was discriminatory or the date you became aware of the incident. Where an aggrieved individual elects, and OEEA determines that Alternative Dispute Resolution (ADR) is appropriate, managers and supervisors have a duty to participate in the ADR process.

In our work processes, PBGC will create avenues for full participation to enable excellence and innovation that is realized through collaboration amongst employees with diverse ideas, experiences, and perspectives. By working together to promote the principles of EEO, we will ensure that all employees and applicants for employment have an opportunity to succeed and contribute to PBGC's mission of protecting America's retirement security. PBGC leadership affirms our collective commitment to a workplace free of unlawful discrimination, harassment, and retaliation.



# EEO Anti-Harassment Policy Statement



445 12th Street SW  
Washington, DC 20024-2101  
202-229-4000  
PBGC.gov

**February 10, 2025**

**TO: ALL PBGC**

**FROM: Ann Y. Orr  
Acting Director**

**ANN ORR**  
Digitally signed by  
ANN ORR  
Date: 2025.02.10  
12:29:46 -05'00'

**SUBJECT: Anti-Harassment Policy Statement**

The Pension Benefit Guaranty Corporation (PBGC) policy statement establishes guidelines and procedures required by equal employment opportunity (EEO) laws that provide protection for a workplace free of all discriminatory harassment. The Agency's anti-harassment policy covers all the protected bases, including race, color, national origin, sex (including pregnancy, sexual harassment, and non-sexual harassment based on sex), religion, age (40 and over), disability (mental or physical), genetic information (including family medical history), and reprisal. PBGC's policy statement also protects against harassment based on parental and marital status. The Agency will not tolerate workplace harassment or reprisal against anyone who engages in protected activity and is committed to providing an environment where all employees are treated with dignity and respect, and free from unlawful discrimination and/or harassment. It is the Agency's policy not to tolerate the adverse treatment of employees because they report harassment or provide information related to such complaints. Agency employees are prohibited from retaliating against and/or harassing those who report such conduct or behavior. Agency employees found to have engaged in retaliatory conduct or behavior should expect timely and appropriate corrective and/or disciplinary action up to removal from the agency.

The Equal Employment Opportunity Commission (EEOC) defines harassment as unwelcome conduct that is based on race, color, national origin, sex (including pregnancy, sexual harassment, and non-sexual harassment based on sex), religion, age (40 and over), disability (mental or physical), genetic information (including family medical history), and reprisal. Harassment becomes unlawful when:

- 1) Enduring offensive conduct becomes a condition of continued employment, or
- 2) The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive; or
- 3) The harassing conduct causes a significant change in the employees' terms, or conditions of employment.

Examples of harassing conduct may include but are not limited to:

- making negative comments about an employee’s personal religious beliefs, or trying to convert them to a certain religious ideology;
- using racist slang, phrases, or nicknames;
- making remarks about an individual’s skin color or other ethnic traits;
- displaying racist drawings, or posters that might be offensive to a particular group;
- making offensive gestures;
- making offensive reference to an individual’s mental or physical disability;
- sharing inappropriate images, videos, e-mails, letters, or notes of an offensive nature;
- offensively talking about negative racial, ethnic, or religious stereotypes; or
- making derogatory age-related comments.

While isolated incidents of harassment generally do not violate federal law, the goal of the Anti-Harassment Policy Statement is to address and eliminate harassing conduct at the earliest possible stage, regardless of whether the conduct violated the law. Additionally, the Anti-Harassment Policy Statement aims to address and prevent antagonistic situations that violate the dignity of the Agency’s employees. It pertains to single or repeated incidents of intimidation, humiliation, degradation, bullying, or other undesirable verbal, non-verbal or physical conduct toward one person or a group of people. All employees are responsible for exhibiting professional conduct and behavior in the workplace and cooperating in the enforcement of this policy. Individuals engaging in conduct or behavior that violates this policy may be subject to appropriate disciplinary action up to, and including, removal from Federal service.

To prevent and remedy incidents of workplace harassment, PBGC officials must be made aware of the conduct or behavior as soon as possible.

No single situation constitutes harassment, and harassment may be direct or indirect.

Anti-discrimination laws also prohibit harassment against individuals in retaliation for filing a discrimination charge, testifying, or participating in any way in an investigation, proceeding, or lawsuit under these laws; or opposing employment practices that they reasonably believe discriminate against individuals, in violation of these laws.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual’s employment; submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance, or creating an intimidating, hostile, or offensive working environment. Such conduct may include:

- an employer or supervisor conditioning promotion, job assignments, or other tangible job benefits based on acquiescence to unwelcome sexual conduct, or penalizing an individual for refusing to participate in such conduct;
- sexist or stereotypical remarks about a person’s clothing, body, appearance, or activities;
- sexually oriented jokes, stories, remarks, or discussions;
- descriptions of sexual acts;

- posting or displaying sexually graphic pictures anywhere in the workplace;
- deliberately touching, pinching, patting, or giving inappropriate looks to another person;
- pressure for dates or sexual activity;
- unwelcome telephone calls, e-mail messages, social network postings or letters of a sexual nature; or
- demands for sexual favors.

In sexual harassment, the harasser may be male or female, and the victim may be of the opposite sex or the same sex as the harasser. Even a consensual relationship between the harasser and the victim may involve sexual harassment. For example, if the victim agrees to sexual behavior out of fear of retaliation, the conduct of the other party may still constitute sexual harassment despite the victim's consent. The focus is on whether the conduct was unwelcome, not consensual.

PBGC will not tolerate the creation of a hostile work environment and will address reported workplace harassment promptly. Individuals who believe they are being harassed or subjected to a hostile work environment are encouraged to tell the alleged harasser (orally or in writing) to stop, keep a record of the events, immediately report the behavior, and cooperate in any inquiry regarding allegations of harassment. Retaliation for reporting workplace harassment or for assisting in any inquiry concerning a report of harassment is prohibited and will not be tolerated. In addition, PBGC is committed to protecting the confidentiality of employees who bring harassment claims, to the extent possible.

PBGC employees who believe they have been harassed or have been subjected to a hostile work environment should report the matter immediately to their immediate supervisor, another management official, PBGC's Office of Equal Employment Opportunity (OEEO) at (202) 229-4363, [all-EEO-federal@PBGC.gov](mailto:all-EEO-federal@PBGC.gov) or PBGC's Harassment Inquiry Committee (HIC):

#### HIC Intake Points of Contact

Paul Chalmers (OGC) – (202) 229-3555

Jaime Kunce (OGC) – (202) 229-3463

Arrie Etheridge (HRD) – (202) 229-3728

Wendy Lawrence (HRD) – (202) 229-3142

- Upon receipt of a harassment allegation, the Agency will conduct a prompt, thorough and impartial inquiry, if appropriate. The fact-finding inquiry will commence within 10 calendar days of the HIC receiving notice of a harassment allegation. Absent extenuating circumstances, an inquiry should be completed, a decision reached, and final corrective action taken within 60 calendar days of the HIC receiving notice of the allegation. Extenuating circumstances include, but are not limited to, a delay in receiving the complainant's statement or supporting documentation. Employees who file internal complaints will be notified about the results of the investigation.

Additional information about the HIC Procedures is available on SharePoint at <http://pbgcgov.sharepoint.com/EEO/Pages/AntiHarassment.aspx>

An employee who reports allegations of harassment or hostile work environment, whether to the HIC, a PBGC supervisor/manager, or HRD, has **not** filed an EEO complaint. An employee who wishes to file an EEO complaint must contact PBGC's OEEO within **45 calendar days** of the alleged harassing conduct or the date they became aware of the harassing conduct. Failure to do so may result in the dismissal of the EEO complaint.

**The federal sector EEO discrimination complaint process cannot be initiated by reporting harassment or hostile work environment to a supervisor or management official, HRD or by contacting the Employee Assistance Program (EAP) or union.**

This policy applies to all PBGC employees. Related questions or requests for information should be directed to the OEEO Director at (202) 229-6868.

# PBGC Organization Chart

