



PENSION BENEFIT GUARANTY CORPORATION

**Management Directive 715
Annual EEO Program Status Report
Fiscal Year 2017**

**Pension Benefit Guaranty Corporation
FY17 Annual EEO Program Status Report
Management Directive 715**

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462 Report

EEOC FORM 715-01 PART A - D	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
For period covering October 1, 2016 to September 30, 2017.				
PART A Department or Agency Identifying Information	1. Agency		Pension Benefit Guaranty Corporation	
	1.a. 2 nd level reporting component			
	1.b. 3 rd level reporting component			
	1.c. 4 th level reporting component			
	2. Address		1200 K Street NW	
	3. City, State, Zip Code		Washington, DC 20005	
	4. CPDF Code	5. FIPS code(s)	4.	5.
PART B Total Employment	1. Enter total number of permanent full-time and part-time employees			908
	2. Enter total number of temporary employees			45
	3. Enter total number employees paid from non-appropriated funds			none
	4. TOTAL EMPLOYMENT [add lines B 1 through 3]			953
PART C Agency Official(s) Responsible For Oversight of EEO Program(s)	1. Head of Agency Official Title		W. Thomas Reeder, PBGC Director	
	2. Agency Head Designee		N/A	
	3. Principal EEO Director/Official Official Title/series/grade		Brenecia Watson, EEO Director/GS-260-15	
	4. Title VII Affirmative EEO Program Official		Hope Fuller, Lead EEO Specialist	
	5. Section 501 Affirmative Action Program Official		Hope Fuller, Lead EEO Specialist	
	6. Complaint Processing Program Manager		Dianne Wood, Attorney Advisor Craig Cassidy, EEO Specialist	
	7. Other Responsible EEO Staff		Kimberly Rodgers, EEO Specialist	
Cynthia Searles, EEO Specialist				

EEOC FORM 715-01 PART A - D	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
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PART D List of Subordinate Components Covered in This Report	Subordinate Component and Location (City/State)	CPDF and FIPS codes	
	N/A		

EEOC FORMS and Documents Included with This Report

*Executive Summary [FORM 715-01 PART E], that includes:	X	*Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01PART G]
Brief paragraph describing the agency's mission and mission-related functions	X	*EEO Plan to Attain the Essential Elements of a Model EEO Program [FORM 715-01PART H] for each programmatic essential element requiring improvement
Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"	X	*EEO Plan to Eliminate Identified Barrier [FORM 715-01 PART I] for each identified barrier
Summary of Analysis of Work Force Profiles including net change analysis and comparison to RCLF		*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 PART J]
Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies	X	*Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans
Summary of EEO Plan action items implemented or accomplished	X	*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues
*Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 PART F]		*Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects
*Copies of relevant EEO Policy Statement(s) and/or excerpts from revisions made to EEO Policy Statements	X	*Organizational Chart

EEOC FORM 715-01 PART E	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
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EXECUTIVE SUMMARY**Introduction**

The Pension Benefit Guaranty Corporation (PBGC) protects the retirement incomes of nearly 40 million American workers in nearly 24,000 private-sector defined benefit pension plans. PBGC was created by the Employee Retirement Income Security Act of 1974 to encourage the continuation and maintenance of private-sector defined benefit pension plans, provide timely and uninterrupted payment of pension benefits, and keep pension insurance premiums at a minimum. For over 40 years, the PBGC has protected the pension benefits of millions of America's workers and retirees, and it is critical to our nation's retirement security. During FY 2017, PBGC assumed responsibility for 23,000 people in 82 trustee single-employer plans and paid \$5.7 billion to nearly 840,000 retirees from more than 4,845 failed single-employer plans.

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

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

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

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

As required by the EEOC, this report was completed utilizing data compiled at the end of FY 2017 and covers the period from October 1, 2016 through September 30, 2017. The workforce data utilized includes permanent employees and was extracted from DataMart, the Interior Business Center of the Department of the Interior.

PBGC's noteworthy progress in FY 2017 in developing an equitable work environment and its plans for enhancing the EEO program are described in the remainder of the document.

The major occupations at PBGC during FY 2017 include Auditor (Series 0511), General Attorney (Series 0905), Actuary (Series 1510), Information Technology Specialist (Series 2210), Accountant (Series 0510), Employee Benefit Law Specialist (Series 0958), Financial Analyst (Series 1160), and Contract Specialist (Series 1102). These occupations represent a significant portion of the PBGC

workforce. Planned affirmative employment and outreach efforts include collaborating with management and the Human Resources Department on recruitment and retention in these major categories.

Workforce Analysis

During the reporting period, PBGC had 45 temporary and 908 permanent employees with total employment of 953. The total number of permanent and temporary employees decreased from FY 2016’s total of 980 employees. The data reflect that Hispanic males and females and White males and females are significantly below their expected Civilian Labor Force (CLF) representation.

The following groups decreased in their representation at PBGC in FY 2017:

- Asian female ratio change: -0.25% (from 5.82% to 5.56%)
- White female ratio change: -0.36% (from 17.04% to 16.68%)
- White male ratio change: -1.07% (from 25.20% to 24.13%)
- Hispanic female ratio change: -0.25% (from 2.45% to 2.20%)
- Hispanic male ratio change: -0.13% (from 2.04% to 1.89%)
- Two-or-More Race female ratio change: -.09% (from 0.51% to 0.42%)

PBGC did see increases in its representation of the following groups in FY 2017:

- Black female ratio change: 0.62% (from 29.18% to 29.80%)
- Black male ratio change: 0.76% (from 12.04% to 12.80%)
- Asian male ratio change: 0.57% (from 5.41% to 5.98%)
- Two-or-More Race males ratio change: 0.21% (from 0.10% to 0.31%)

PBGC Workforce	Benchmark (National 2010 CLF)	FY2017 PBGC %	FY2016 PBGC %	FY2015 PBGC %
White Males	38.33%	24.13%	25.20%	25.71%
White Females	34.03%	16.68%	17.04%	17.52%
Hispanic Males	5.17%	1.89%	2.04%	1.89%
Hispanic Females	4.79%	2.20%	2.45%	2.10%
Black Males	5.49%	12.80%	12.04%	12.59%
Black Females	6.53%	29.80%	29.18%	29.70%
Asian Males	1.97%	5.98%	5.41%	3.88%
Asian Females	1.93%	5.56%	5.82%	5.98%
American Indian Males	0.55%	0.10%	0.10%	0.10%
American Indian Females	0.53%	0.10%	0.10%	0.10%
Native Hawaiian Males	0.07%	0.00%	0.00%	0.00%
Native Hawaiian Females	0.07%	0.00%	0.00%	0.00%
Two or More Races Males	0.26%	0.31%	0.10%	0.10%
Two or More Races Females	0.28%	0.42%	0.51%	0.31%

PBGC also saw an increase in its representation of Persons with Disabilities (PWDs). In FY 2017, there were 85 PWDs which is an overall gain of one new employee from the previous year. This includes 14 persons with a targeted disability (PWTDs). PWDs represent 8.92% of the Agency’s workforce, a net increase of 1.19% from the previous year. PWTDs represent 1.47% of the Agency’s workforce, a net increase of 7.69% from the previous year. However, the representation rate remains below the EEOC’s goal of 2.00%. Persons with targeted disabilities are represented in the following occupations:

- Auditing
- Financial Analyst
- Actuarial Science

- Information Technology Specialist

PBGC Workforce	FY2017 PBGC %	FY2016 PBGC %	FY2015 PBGC %
People with Disabilities	8.92%	8.57%	8.08%
No Disability	86.57%	86.73%	87.83%
Not Identified	4.51%	4.69%	4.09%

As a result of the strategies implemented in its FY 2016-2018 Disabled Veterans Affirmative Action Program (DVAAP) Plan, PBGC hired five full-time equivalent (FTE) disabled veterans in FY 2017. As of the end of FY 2017, PBGC employed (a) 31 “10 point” disabled veterans; (b) 54 “5 point” veterans for a total of 85 documented veterans out of a total workforce of 953 employees (about 8.9 percent of PBGC’s workforce).

Results of the Agency’s Annual Self-Assessment

PBGC conducted its annual self-assessment of the EEOC’s Management Directive (MD) 715 six Essential Elements and continues to report steady progress towards model EEO program status. The following chart reflects the percentage met for each essential element of a model EEO program:

Element	Number of Deficiencies	FY 2017 Percentage	Number of Deficiencies	FY 2016 Percentage
A – Demonstrated Leadership Commitment	0	100%	1	95%
B – Integration of EEO in Strategic Mission	0	100%	3	91%
C - Management & Program Accountability	0	100%	0	100%
D - Proactive Discrimination Prevention	1	90%	2	80%
E - Efficiency	2	94%	2	94%
F - Responsiveness & Legal Compliance	0	100%	0	100%
Summary Score		97%		93%

Essential Element A: Demonstrated Commitment from Agency Leadership

- The EEO Director met with Agency Head, Senior Leadership and/or Department Directors to discuss EEO programs and initiatives throughout the year.
- The State of the Agency’s EEO Program briefing was delivered to the Agency Head and Senior Leadership. The presentation was posted to the Agency’s intranet. Agency leadership supported:
- MD-715 and No FEAR Act Quarterly and Annual Reports posting on internal and external websites.
- Dissemination of information about PBGC’s EEO programs to employees in new employee orientations and on Agency’s internal website.
- PBGC Senior Leadership demonstrated commitment to equal opportunity, diversity and inclusion by supporting the PBGC Diversity Council’s “Community Day” event which showcased the Agency’s organizational diversity.

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

- PBGC enhanced constructive collaborative departmental partnerships involving OEE0 that resulted in measurably improved integration of EEO, diversity and inclusion principles throughout the Agency's strategic operations in FY 2017.
- Agency's Strategic Human Capital Plan.
- PBGC Annual Performance Report.
- Collaborative preparation of Federal Equal Opportunity Recruitment Program (FEORP), Disabled Veterans Affirmative Action Program (DVAAP), and Hispanic Employment Reports for FY 2017.
- PBGC conducted barrier and trends analysis (BATA) in four organizations (representing 40 percent of its workforce), consisting of multiple departments, providing workforce demographics, trigger and barrier assessments on key human capital areas e.g. recruitment and hiring, separations, promotions. Comprehensive reports were provided to senior leadership including specific improvement strategies, and recommendations that will lead to greater organizational success and increased mission accomplishment.

The Agency developed, conducted, delivered, and participated in:

- Multiple trainings on EEO, diversity & inclusion, and reasonable accommodation.
- Seven well-attended educationally focused Special Emphasis Program observances.
- PBGC's OEE0 and HRD departments collaboratively participated in discussions on human capital programs, succession planning, recruitment, personnel directives/policies, special emphasis programming and training.
- OEE0 received from HRD quarterly reports of promotions to supervisory positions, confirms issuance of Policy Statements, and establishes training schedules for mandatory training.
- OEE0 reviewed and established a schedule for ongoing mandatory EEO training courses for both current and new managers and supervisors.
- OEE0 worked with HRD through ongoing EEO/HR Team meetings and PBGC's Diversity & Inclusion Strategic Plan initiatives to recommend and coordinate diversity-training courses for both current and new managers, supervisors and employees

Essential Element C: Management and Program Accountability

- PBGC managers and supervisors are evaluated on their commitment to PBGC's affirmative employment principles, and EEO and Diversity goals.

Agency policies, procedures, and practices were examined for hidden impediments to equal opportunity for groups of employees or applicants. Such reviews touched all aspects of PBGC operations:

- Preserving plans and protecting pensioners.
- Paying timely and accurate benefits.
- Maintaining high standards of stewardship and accountability.
- PBGC has a policy discouraging offensive conduct before it rises to the level of discriminatory harassment. Employees are encouraged to report offensive, unwanted conduct. In FY 2017,

based on such reports, the Office of the General Counsel and the Human Resources Department assisted 15 employees through the Agency's Harassment Inquiry Committee (HIC).

Essential Element D: Proactive Prevention of Unlawful Discrimination

- PBGC provided managers, supervisors, and employees' information regarding their rights and responsibilities under various anti-discrimination and anti-retaliation laws through posters, intranet content, all-employee emails, and policy statements.
- The Agency conducted formal trainings of PBGC managers and staff in the areas of EEO, Diversity, Inclusion, and reasonable accommodation.
- Agency organizations sought barrier analysis and workforce assessment services from OEEA to identify and/or correct potential barriers to equal opportunity.

Essential Element E: Efficiency

- The Agency promotes early resolution of complaints and the use of alternative dispute resolution (ADR) as an option to its traditional administrative EEO process. The commitment to ADR is communicated to employees through the intranet, training, and during individual meetings with parties seeking assistance from OEEA.
- For FY 2017, Alternative Dispute Resolution (ADR) was offered at a rate of 27% for the 22 Informal EEO Complaints cases filed. Of the 6 cases where it was offered, 4 individuals, or 66% percent accepted. The average days to set up a mediation was 10.
- PBGC received and processed 15 formal complaints alleging employment discrimination in FY 2017.

Essential Element F: Responsiveness and Legal Compliance

- Annual Federal EEO Statistical Report on Discrimination Complaints (EEOC Form 462) and Annual Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (NO FEAR) report was submitted within established timeframes.
- The Agency successfully processed 80 percent of informal complaints within regulatory time frames.
- The following reflects PBGC's formal complaints activity in FY 2017:
- By the end of the fiscal year, the Agency had 70 formal complaints in inventory.
 - 71 formal complaints were on hand from FY2016
 - 16 formal complaints were filed in FY2017
 - 3 formal complaints were remanded from the EEOC
 - 20 formal complaints were closed
- Of the 70 formal complaints on hand
 - 0 pending letter of acknowledgement
 - 3 pending accept/dismiss
 - 10 in the investigative phase
 - 51 pending hearing with administrative judge
 - 6 pending final agency decisions

PBGC's Ongoing Commitment to a Model EEO Program and a Look Ahead to FY 2018

- PBGC's senior leadership team, including its Director, demonstrate their commitment to moving the corporation to model EEO program status. Through their support, Agency-wide EEO, D & I training, and barrier analysis was continued during FY 2017.

- OEEEO will continue to collaborate with HRD through quarterly EEO/HR meetings to ensure use of meaningful and effective Senior Level and managerial performance standards that clearly demonstrate agency leadership commitment to and accountability for promoting EEO and affirmative employment principles, as well as incorporating the EEOC model agency program compliance indicators and measures.
- OEEEO receives from HRD quarterly reports of promotions to supervisory positions, confirms issuance of Policy Statements, and establishes training schedules for mandatory training.
- OEEEO offered mandatory Supervisory EEO training in FY 2017 and will review and establish a schedule for ongoing mandatory EEO training courses for both current and new managers and supervisors.
- OEEEO will continue to work with HRD through ongoing EEO/HR Team meetings and PBGC's Diversity & Inclusion Strategic Plan initiatives to recommend and coordinate diversity-training courses for both current and new managers, supervisors and employees.

- For FY 2018, Agency senior leaders have expressed continued support for conducting barrier analysis, expanded integration of equal opportunity, diversity and inclusion into the Agency's strategic operations, proactive prevention, and enhanced complaint processing efficiencies.
- Engage senior leaders, human resource staff, outreach coordinator and hiring officials to examine ways to improve recruitment and retention; discuss process improvement to determine whether the recruitment and selection process should be refined internally.

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

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

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

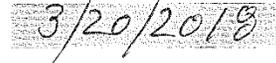
The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for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

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

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



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



Date



Signature of Agency Head or Agency Head Designee



Date

EEOC FORM 715-01 PART G		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT		
Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.				
 Compliance Indicator	EEO policy statements are up-to-date.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Was the EEO policy Statement issued within 6 - 9 months of the installation of the Agency Head? If no, provide an explanation.		X		
During the current Agency Head's tenure, has the EEO policy Statement been re-issued annually? If no, provide an explanation.		X		
Are new employees provided a copy of the EEO policy statement during orientation?		X		
When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO policy statement?		X		
 Compliance Indicator	EEO policy statements have been communicated to all employees.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Have the heads of subordinate reporting components communicated support of all agency EEO policies through the ranks?			X	N/A. There are no PBGC subordinate reporting components.
Has the agency made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?		X		
Has the agency prominently posted such written materials in all personnel offices, EEO offices, and on the agency's internal website? [see 29 CFR §1614.102(b)(5)]		X		

 Compliance Indicator	Agency EEO policy is vigorously enforced by agency management.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	
 Measures				
Are managers and supervisors evaluated on their commitment to agency EEO policies and principles, including their efforts to:		X		
resolve problems/disagreements and other conflicts in their respective work environments as they arise?		X		
address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?		X		
support the agency's EEO program through allocation of mission personnel to participate in community out-reach and recruitment programs with private employers, public schools and universities?		X		
ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?		X		
ensure a workplace that is free from all forms of discrimination, harassment and retaliation?		X		
ensure that subordinate supervisors have effective managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?		X		
ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?		X		
ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?		X		
Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?		X		Policy Statements & EEO trainings
Describe what means were utilized by the agency to so inform its workforce about the penalties for unacceptable behavior.				
Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedures available on the World Wide Web or Internet?		X		
Have managers and supervisor been trained on their responsibilities under the procedures for reasonable accommodation?		X		

Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION Requires that the agency's EEO programs be organized and structured to maintain a workplace that is free from discrimination in any of the agency's policies, procedures or practices and supports the agency's strategic mission.				
 Compliance Indicator	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 has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
<p>Is the EEO Director under the direct supervision of the agency head? [see 29 CFR §1614.102(b)(4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)</p>		X		
<p>Are the duties and responsibilities of EEO officials clearly defined?</p>		X		
<p>Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?</p>		X		
<p>If the agency has 2nd level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?</p>			X	N/A - There are no subordinate components.
<p>If the agency has 2nd level reporting components, does the agency-wide EEO Director have authority for the EEO programs within the subordinate reporting components?</p>			X	N/A - There are no subordinate components.
<p>If not, please describe how EEO program authority is delegated to subordinate reporting components.</p>				
 Compliance Indicator	The EEO Director and other EEO professional staff responsible for EEO programs have regular and effective means of informing the agency head and senior management officials of the status of EEO programs and are involved in, and consulted on, management/personnel actions.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
<p>Does the EEO Director/Officer have a regular and effective means of informing the agency head and other top management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program?</p>		X		
<p>Following the submission of the immediately preceding FORM 715-01, did the EEO Director/Officer present to the head of the agency and other senior officials the "State of the Agency" briefing covering all components of the EEO report, including an assessment of the performance of the agency in each of the six elements of the Model EEO Program and a report on the progress of the agency in completing its barrier analysis including any barriers it identified and/or eliminated or reduced the impact of?</p>		X		
<p>Are EEO program officials present during agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes?</p>		X		
<p>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 re-alignments?</p>		X		

Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? [see 29 C.F.R. § 1614.102(b)(3)]		X		
Is the EEO Director included in the agency's strategic planning, especially the agency's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into the agency's strategic mission?		X		
 Compliance Indicator	The agency has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the EEO Director have the authority and funding to ensure implementation of agency EEO action plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?		X		
Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?		X		
Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?		X		
Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204		X		
Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204		X		
People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102; 5 CFR 213.3102(t) and (u); 5 CFR 315.709		X		
Are other agency special emphasis programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as FEORP - 5 CFR 720; Veterans Employment Programs; and Black/African American; American Indian/Alaska Native, Asian American/Pacific Islander programs?		X		
 Compliance Indicator	The agency has committed sufficient budget to support the success of its EEO Programs.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Are there sufficient resources to enable the agency to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems		X		

Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)	X		
Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?	X		
Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?	X		
Does the agency fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?	X		
Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?	X		
Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [see 29 C.F.R. § 1614.102(b)(5)]	X		
Is there sufficient funding to ensure that all employees have access to this training and information?	X		
Is there sufficient funding to provide all managers and supervisors with training and periodic up-dates on their EEO responsibilities:	X		
for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?	X		
to provide religious accommodations?	X		
to provide disability accommodations in accordance with the agency's written procedures?	X		
in the EEO discrimination complaint process?	X		
to participate in ADR?	X		

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY				
This element requires the Agency Head to hold all managers, supervisors, and EEO Officials responsible for the effective implementation of the agency's EEO Program and Plan.				
 Compliance Indicator	EEO program officials advise and provide appropriate assistance to managers/supervisors about the status of EEO programs within each manager's or supervisor's area or responsibility.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	
Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?		X		
Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief Information Officer?		X		

 Compliance Indicator	The Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [see 29 CFR § 1614.102(b)(3)]	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Have time-tables or schedules been established for the agency to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?	X		
	Have time-tables or schedules been established for the agency to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all groups?	X		
	Have time-tables or schedules been established for the agency to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?	X		
 Compliance Indicator	When findings of discrimination are made, the agency explores whether or not disciplinary actions should be taken.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	Does the agency have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?	X		
	Have all employees, supervisors, and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?	X		
	Has the agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?	X		
If so, cite number found to have discriminated and list penalty /disciplinary action for each type of violation.				
	Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?	X		
	Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	X		
Essential Element D: PROACTIVE PREVENTION Requires that the agency head makes early efforts to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.				
 Compliance Indicator	Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	

Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?		X		
When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?		X		See Part H planned activities.
Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?			X	See Part H planned activities.
Are trend analyses of workforce profiles conducted by race, national origin, sex and disability?		X		
Are trend analyses of the workforce's major occupations conducted by race, national origin, sex and disability?		X		
Are trends analyses of the workforce's grade level distribution conducted by race, national origin, sex and disability?		X		
Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex and disability?		X		
Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex and disability?		X		
 Compliance Indicator	The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Are all employees encouraged to use ADR?		X		
Is the participation of supervisors and managers in the ADR process required?		X		
Essential Element E: EFFICIENCY Requires that the agency head ensure that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO Programs as well as an efficient and fair dispute resolution process.				
 Compliance Indicator	The agency has sufficient staffing, funding, and authority to achieve the elimination of identified barriers.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?		X		
Has the agency implemented an adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?		X		
Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?			X	N/A. PBGC does not have any field facilities.

Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of the agency?		X		
Are 90% of accommodation requests processed within the time frame set forth in the agency procedures for reasonable accommodation?		X		
 Compliance Indicator	The agency has an effective complaint tracking and monitoring system in place to increase the effectiveness of the agency's EEO Programs.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the agency use a complaint tracking and monitoring system that allows identification of the location, and status of complaints and length of time elapsed at each stage of the agency's complaint resolution process?		X		
Does the agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?		X		
Does the agency hold contractors accountable for delay in counseling and investigation processing times?		X		
<p>If yes, briefly describe how:</p> <p>Contracts provide for reductions in contract amounts for overdue/unsatisfactory contractor performance.</p>				
Does the agency monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?		X		
Does the agency monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?		X		
 Compliance Indicator	The agency has sufficient staffing, funding and authority to comply with the time frames in accordance with the EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Are benchmarks in place that compare the agency's discrimination complaint processes with 29 C.F.R. Part 1614?		X		
Does the agency provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?		X		
Does the agency provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?		X		
Does the agency complete the investigations within the applicable prescribed time frame?			X	28% of the Agency's investigation were completed within the prescribe time frames.
When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?		X		

When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?		X		
When a settlement agreement is entered into, does the agency timely complete any obligations provided for in such agreements?		X		
Does the agency ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by the agency?		X		
 Compliance Indicator	There is an efficient and fair dispute resolution process and effective systems for evaluating the impact and effectiveness of the agency's EEO complaint processing program.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
In accordance with 29 C.F.R. §1614.102(b), has the agency established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?		X		
Does the agency require all managers and supervisors to receive ADR training in accordance with EEOC (29 C.F.R. Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?		X		
After the agency has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?		X		
Does the responsible management official directly involved in the dispute have settlement authority?			X	<i>When EEO ADR is offered, the accused manager has a duty to cooperate in the EEO ADR process. However, that manager may not be the agency official that has settlement authority.</i>
 Compliance Indicator	The agency has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the agency have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?		X		
Does the agency provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. § 1614.102(a)(1)?		X		
Does the agency EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all the required data elements for submitting annual reports to the EEOC?		X		
Do the agency's EEO programs address all of the laws enforced by the EEOC?		X		

Does the agency identify and monitor significant trends in complaint processing to determine whether the agency is meeting its obligations under Title VII and the Rehabilitation Act?		X		
Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?		X		
Does the agency consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?		X		
 Compliance Indicator	The agency ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints?		X		
Does the agency discrimination complaint process ensure a neutral adjudication function?		X		
If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?		X		
Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE This element requires that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions.				
 Compliance Indicator	Agency personnel are accountable for timely compliance with orders issued by EEOC Administrative Judges.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the agency have a system of management control to ensure that agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?		X		
 Compliance Indicator	The agency's system of management controls ensures that the agency timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
Does the agency have control over the payroll processing function of the agency? If Yes, answer the two questions below.		X		
Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?		X		
Are procedures in place to promptly process other forms of ordered relief?		X		

 Compliance Indicator	Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		 Measures	Yes	
Is compliance with EEOC orders encompassed in the performance standards of any agency employees?		X		
If so, please identify the employees by title in the comments section, and state how performance is measured.				The EEO Director and EEO Attorney Advisor's performance plans require compliance with EEOC orders. Performance is measured by quality and timeliness of compliance with EEOC orders.
Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?		X		
If not, please identify the unit in which it is located, the number of employees in the unit, and their grade levels in the comments section.				
Have the involved employees received any formal training in EEO compliance?		X		
Does the agency promptly provide to the EEOC the following documentation for completing compliance.		X		
Attorney Fees: Copy of check issued for attorney fees and /or a narrative statement by an appropriate agency official, or agency payment order dating the dollar amount of attorney fees paid?		X		
Awards: A narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?		X		
Back Pay and Interest: Computer print-outs or payroll documents outlining gross back pay and interest, copy of any checks issued, narrative statement by an appropriate agency official of total monies paid?		X		
Compensatory Damages: The final agency decision and evidence of payment, if made?		X		
Training: Attendance roster at training session(s) or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a date certain?		X		
Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s		X		
Posting of Notice of Violation: Original signed and dated notice reflecting the dates that the notice was posted. A copy of the notice will suffice if the original is not available.		X		
Supplemental Investigation: 1. Copy of letter to complainant acknowledging receipt from EEOC of remanded case. 2. Copy of letter to complainant transmitting the Report of Investigation (not the ROI itself unless specified). 3. Copy of request for a hearing (complainant's request or agency's transmittal letter).		X		
Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing.		X		

Restoration of Leave: Print-out or statement identifying the amount of leave restored, if applicable. If not, an explanation or statement.	X		
Civil Actions: A complete copy of the civil action complaint demonstrating same issues raised as in compliance matter.	X		
Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable. Also, appropriate documentation of relief is provided.	X		

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Pension Benefit Guaranty Corporation	FY 2017
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STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Essential Element D: PROACTIVE PREVENTION - Senior managers do not actively participate and collaborate with OEEO in the identification of barriers to equal employment.
OBJECTIVE:	EEO Director and EEO program officials to meet with Senior managers annually to assist in the identification of barriers that may be impeding the realization of equal employment opportunity; Senior managers successfully implement EEO Action Plans and incorporate plan objectives into their organizational strategic plans.
RESPONSIBLE OFFICIAL:	Management officials (Department Directors, managers and supervisors) EEO Director and staff, Human Resources Director and staff.
DATE OBJECTIVE INITIATED:	April 2013
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 2019

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The EEO Office will continue to monitor and assess trends regarding the various organizational workforce demographics to determine areas that may require continued focus in realizing equal opportunity.	September 30, 2019
The EEO will meet with each organizational Director and leadership to review Barrier and Trend Analysis recommendations and collaborate to develop action plans to address recommendations.	September 30, 2019

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

- Provided five organizational leaders with Barrier and Trend Analysis regarding their workforce demographics.
- PBGC provided managers, supervisors and employees information regarding their rights and responsibilities under various anti-discrimination and anti-retaliation laws through posters, intranet content, all-employee emails, and policy statements.
- The Agency conducted formal trainings of PBGC managers and staff regarding the following subject:
 - EEO for New Supervisors
 - Workplace Harassment
 - No FEAR
 - EEO For Supervisors
 - OEEO Hosted an Open House to reintroduce its mission and staff to PBGC's workforce.
- Established two Special Emphasis Program Committees (Affirmative Employment Committees)
 - The Federal Women's Program Committee
 - The Hispanic Employment Program

In addition, this effort to address proactive prevention also supports the integration of EEO into the agency's strategic mission (Essential Element B) by identifying the roles and responsibilities of each organization in eliminating unlawful discrimination.

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Pension Benefit Guaranty Corporation		FY 2017
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Essential Element E: EFFICIENCY - Agency does not complete investigations within the applicable prescribed time frame of 180 days.	
OBJECTIVE:	To complete investigations within the applicable prescribed time frame of 180 days.	
RESPONSIBLE OFFICIAL:	OEEO Director, Complaints Manager, and Complaints Staff.	
DATE OBJECTIVE INITIATED:	January 2018	
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 2019	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
Complaint staff will review internal process to look for obstacles to timely completion of investigations.	September 30, 2019	
Manage external investigators more closely by requiring weekly status reports to ensure investigators are on track to timely complete and submit the reports of investigation.	September 30, 2019	
The complaints staff will meet on a regular basis (bi-weekly) to review the status of complaints in process and to identify potential obstacles that may impact timely completion of investigations.	September 30, 2019	
Staff was hired in FY17 to alleviate the workload of the complaints manager. Complaints Manager's focus can be given to the timely completion of final agency decisions.	September 30, 2019	

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

During FY17, OEEEO hired staff to address insufficient staffing that had impacted the efficiency of the agency's Model EEO Program.

Additional accomplishments will be listed on FY 2018 MD-715 report.

Pension Benefit Guaranty Corporation

FY 2017

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

When comparing representation rates of mission critical occupations to the Occupational Civilian Labor Force benchmark, Hispanic males have lower than anticipated participation rates in Accounting (0510), Auditing (0511), General Attorney (0905), Employee Law benefit (0958), and ITS (2210).

Hispanic females also have consistently lower than anticipated participation rates across all mission-critical occupations except Auditing (0511).

PBGC Major Occupations & Occupational CLF Rates	Male	Female
ACCOUNTING (0510)	1.56%	1.56%
<i>Occupational CLF</i>	2.19%	3.93%
AUDITING (0511)	0.00%	5.26%
<i>Occupational CLF</i>	2.19%	3.93%
GENERAL ATTORNEY (0905)	1.01%	1.01%
<i>Occupational CLF</i>	2.52%	1.85%
EMPLOYEE BENEFITS LAW (0958)	0.00%	0.00%
<i>Occupational CLF</i>	2.05%	7.35%
CONTRACTING (1102)	5.26%	0.00%
<i>Occupational CLF</i>	3.29%	3.80%
FINANCIAL ANALYSIS (1160)	4.08%	0.00%
<i>Occupational CLF</i>	3.10%	1.97%
ACTUARIAL SCIENCE (1510)	3.23%	0.00%
<i>Occupational CLF</i>	1.30%	0.56%
INFORMATION TECHNOLOGY MANAGEMENT (2210)	3.67%	0.00%
<i>Occupational CLF</i>	5.39%	2.17%

When reviewing grades GS-12 through SL, Hispanic females are not represented at GS-15 or SL levels. However, they are at parity or above their rate of representation in the grades that they do occupy. It should also be noted that Hispanics are not represented on the Executive Management Council.

	<p>Furthermore, when compared to the National Civilian Labor Force (NCLF), Hispanic employees have lower than anticipated representation in the PBGC workforce. The participation rates of Hispanic males and females in PBGC and the NCLF are as follows:</p> <table border="1" data-bbox="886 443 1398 569"> <thead> <tr> <th></th> <th>Males</th> <th>Females</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>PBGC</td> <td>1.89%</td> <td>2.20%</td> <td>4.09%</td> </tr> <tr> <td>NCLF</td> <td>5.17%</td> <td>4.79%</td> <td>9.96%</td> </tr> </tbody> </table> <p>Finally, FY 2017 Hispanic representation within PBGC had a net decrease of 11% (5 FTEs) when compared to the FY 2016 representation.</p>		Males	Females	Total	PBGC	1.89%	2.20%	4.09%	NCLF	5.17%	4.79%	9.96%
	Males	Females	Total										
PBGC	1.89%	2.20%	4.09%										
NCLF	5.17%	4.79%	9.96%										
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>The Office of Equal Employment Opportunity completed a review of FY 2017 workforce and human resources data for PBGC major occupations, applicant flow, recruitment activities and new hires. Triggers were identified through analysis of the FY 2017 workforce tables.</p> <p>In FY 2017, barrier analysis efforts will continue to focus on the applicant flow data, recruitment, and hiring. Other elements of the employee life cycle will also be analyzed to determine the impact of the recruitment and retention of Hispanics.</p>												
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>The workforce data analysis suggest that barriers may exist for Hispanic employees in the hiring/selections processes of PBGC's mission-critical occupations.</p>												
<p>OBJECTIVE:</p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Increase the hiring of Hispanic males and females in PBGC by expanding the applicant pool for mission-critical occupations. Work with management and staff to identify any barriers and develop effective strategies and action plans. Provide recommendations to agency management and HRD to overcome any identified triggers/barriers.</p>												
<p>RESPONSIBLE OFFICIAL:</p>	<p>EEO and HRD Directors and Staff, PBGC, Department Directors and Management Team</p>												
<p>DATE OBJECTIVE INITIATED:</p>	<p>October 1, 2016</p>												

TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2020	
EEOC FORM 715-01 PART I	EEO Plan To Eliminate Identified Barrier	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
Build relationships with organizations such as National Hispanic MBA Association, Hispanic National Bar Association, Latinos in Information Sciences and Technology	March 30, 2020	
Review the applicant pool and exit interview data to identify trends/barriers in hiring and selection of Hispanic employees	September 30, 2019	
Evaluate policies and practices and observe how qualified applicants are selected into positions and assess whether the agency's selection process has any deficiencies or potential barriers	September 30, 2020	
Assess the effectiveness of mentorships and developmental programs in increasing representation of groups that are below their rate of representation in senior level positions and the feeder pool for senior level positions.	September 30, 2020	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE		
<p>Established the Hispanic Employment Program Committee which focuses on eliminating discriminatory practices; ensuring that Hispanics are adequately represented throughout the workforce; identifying and removing barriers that may impede Hispanics from achieving their full potential in the workforce; and increasing awareness and fostering an environment of inclusion.</p> <p>In FY 2017, PBGC received applications from Hispanic males and females in seven out of the eight mission critical occupations: Accountant (0510), Actuary (1510), Auditor (0511), Contract Specialist (1102), Employee Benefits Law Specialist (0958), General Attorney (0905), and Information Technology Specialist (2210). One female was hired as an Employee Benefits Law Specialist. Two Hispanic males applied and received internal promotions in Accounting and Supervisory Actuary.</p>		

EEOC FORM 715-01 PART I	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
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<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>When comparing Female representation rates of grades GS-12 through SL to the representation rate of the Female workforce benchmark, we identified the following:</p> <p>Black females are below their rate of representation at grades GS-14 through SL levels and Asian females at grades GS-14 and the SL level. White females occupy grades GS-12 & GS-13 below their representation in the Corporation and Hispanic females are below in GS-15 and SL levels. All other female demographics are at parity with their representation in the workforce.</p> <p><i>*Triggers were identified through review and analysis of the FY 2017 workforce tables A/B1, A/B4, A/B6.</i></p>	
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>The OEEO completed a review of FY 2017 workforce data for PBGC grades, applicant flow, recruitment activities and new hires when triggers were identified.</p> <p>In FY 2017, barrier analysis efforts will continue to focus on the applicant flow data, recruitment, and hiring. Other elements of the employee life cycle will also be analyzed to determine where barriers may exist that hinder Hispanic, Black and Asian females from being hired and/or promoted into the senior level grades at their expected representation rate.</p>	
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>The workforce data suggest that barriers may exist for Hispanic, Black and Asian females in the recruitment and/or hiring processes of PBGC's occupations that lead to the management track.</p>	
<p>OBJECTIVE:</p>	<p>To increase the hiring and/or promotion of Hispanic, Black and Asian females within PBGC by expanding the applicant pool for positions that lead to senior level management and SL track.</p>	

State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.		Work with management and staff to identify potential barriers, develop effective strategies and action plans within PBGC.	
RESPONSIBLE OFFICIAL:		EEO and HRD Directors and Staff, PBGC Department Directors and Management Team	
DATE OBJECTIVE INITIATED:		January 1, 2017	
TARGET DATE FOR COMPLETION OF OBJECTIVE:		September 30, 2020	
EEOC FORM 715-01 PART I	EEO Plan To Eliminate Identified Barrier		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		TARGET DATE (Must be specific)	
Conduct focus groups of current staff to identify anecdotal information regarding promotion experiences.		September 30, 2019	
Review the applicant pool, review position files and exit interview data to identify trends and potential barriers in hiring and retention of white females.		September 30, 2019	
Evaluate policies and practices and observe how qualified applicants are selected into senior grade level positions and assess whether the agency's selection process has any deficiencies or potential barriers.		September 30, 2020	
Assess the effectiveness of mentorships and developmental programs in increasing representation of groups that are below their rate of representation in senior level positions and the feeder pool for senior level positions.		September 30, 2020	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE			
OEEEO completed statistical analysis of workforce data and barrier and Trends Analysis (BATA). This information will be used to develop strategies to support equal opportunity for all groups.			

EEOC FORM 715-01 PART I	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
Pension Benefit Guaranty Corporation	FY 2017	
<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Persons with Disabilities(PWD) or Persons with Targeted Disabilities (PWTD) are not tracked in the US labor pool. However, EEOC has established goals for persons with reportable disabilities (12%) and targeted disabilities (2%)Currently PBGC has an 8.94% representation rate for PWD and representation rate of 1.47% for PWTD.</p> <p>*Triggers were identified through analysis of FY 2017 workforce tables B1-6, B7, B9, B11 and B13</p>	
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>The Office of Equal Employment Opportunity completed a review and analysis of FY 2017 workforce and human resources data for PBGC major occupations, applicant flow, recruitment activities and new hires.</p>	
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>The workforce data suggest that barriers may exist for PWTD in the recruitment and/or hiring processes for PBGC's mission-critical occupations.</p>	
<p>OBJECTIVE:</p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Increase the hiring of PWDs in PBGC by expanding the applicant pool for mission-critical occupations. Work with management and staff to identify any barriers and develop effective strategies and action plans. Provide recommendations to agency management and HRD to overcome any identified triggers/barriers.</p>	
<p>RESPONSIBLE OFFICIAL:</p>	<p>EEO and HRD Directors and Staff, PBGC, Department Directors and Management Team</p>	
<p>DATE OBJECTIVE INITIATED:</p>	<p>October 1, 2016</p>	
<p>TARGET DATE FOR COMPLETION OF OBJECTIVE:</p>	<p>September 30, 2020</p>	

EEOC FORM 715-01 PART I	EEO Plan To Eliminate Identified Barrier	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)	
Use BATA Action Planning to work with organizations to develop strategic communications and target outreach efforts focused on engaging potential applicants that belong to PWTD focused affinity groups.	September 30, 2019	
Review the applicant pool and exit interview data to identify trends/barriers in hiring and retention of persons with targeted disabilities (PWTDs).	September 30, 2019	
Evaluate policies and practices and observe how qualified applicants are selected into positions and assess whether the agency's selection process has any deficiencies or potential barriers	September 30, 2020	
Determine the inclusion rate of PWTD for PBGC's mission critical occupations and those that lead to SL positions. Analyze industry benchmarks to identify opportunities for improvement.	September 30, 2019	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE		
Continued to conduct statistical analysis of workforce data focused on persons with targeted disabilities for occupational series at various grade levels and conducted trend and barrier analysis on the identified work life cycle trigger areas.		

EEOC FORM 715-01 PART I	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT																
Pension Benefit Guaranty Corporation	FY 2017																
<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>When comparing African American representation rates of grades GS-14 through SL to the representation rate of the African American workforce benchmark, the males and females in these demographics are in most cases, below their rate of representation at grades GS-14 through SL levels. Males comprise 12.8% and females comprise 29.8% of the PBGC workforce yet they are represented at the following rates in the senior level grades:</p> <table border="1" data-bbox="922 737 1386 1010"> <thead> <tr> <th colspan="3" style="text-align: center;">African-American Representation By Sr. Grades</th> </tr> <tr> <th></th> <th style="text-align: center;">Male</th> <th style="text-align: center;">Female</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">GS-14</td> <td style="text-align: center;">12.17%</td> <td style="text-align: center;">20.72%</td> </tr> <tr> <td style="text-align: center;">GS-15</td> <td style="text-align: center;">10.34%</td> <td style="text-align: center;">15.17%</td> </tr> <tr> <td style="text-align: center;">SL</td> <td style="text-align: center;">2.94%</td> <td style="text-align: center;">5.88%</td> </tr> </tbody> </table> <p><i>*Triggers were identified through review and analysis of the FY 2017 workforce tables A/B1, A/B4, A/B6.</i></p>		African-American Representation By Sr. Grades				Male	Female	GS-14	12.17%	20.72%	GS-15	10.34%	15.17%	SL	2.94%	5.88%
African-American Representation By Sr. Grades																	
	Male	Female															
GS-14	12.17%	20.72%															
GS-15	10.34%	15.17%															
SL	2.94%	5.88%															
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>The OEEO completed a review of FY 2017 workforce data for PBGC grades when triggers were identified.</p> <p>In FY 2018, barrier analysis efforts will continue to focus on the applicant flow data, recruitment, and hiring. Other elements of the employee life cycle will also be analyzed to determine where barriers may exist that hinder African Americans from being hired and/or promoted into the senior level grades at their expected representation rate.</p>																
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>The workforce data suggest that barriers may exist for African Americans in the recruitment and/or hiring processes for PBGC's occupations that lead to the senior level and SL levels.</p>																

OBJECTIVE: State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.		To increase the promotion of African Americans within PBGC by expanding the feeder pool for positions that lead to senior level management and SL track. Work with management and staff to identify potential barriers, develop educational programs and develop effective strategies and action plans to support this objective.	
RESPONSIBLE OFFICIAL:		EEO and HRD Directors and Staff, PBGC Department Directors and Management Team	
DATE OBJECTIVE INITIATED:		January 1, 2017	
TARGET DATE FOR COMPLETION OF OBJECTIVE:		September 30, 2020	
EEOC FORM 715-01 PART I	EEO Plan To Eliminate Identified Barrier		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:		TARGET DATE (Must be specific)	
Conduct focus groups of current staff to identify anecdotal information regarding promotion experiences.		September 30, 2019	
Review the applicant pool, review position files and exit interview data to identify trends and potential barriers in hiring and retention of African Americans.		September 30, 2019	
Evaluate policies and practices and observe how qualified applicants are selected into senior grade level positions and assess whether the agency's selection process has any deficiencies or potential barriers.		September 30, 2020	
Assess the effectiveness of mentorships and developmental programs in increasing representation of groups that are below their rate of representation in senior level positions and the feeder pool for senior level positions.		September 30, 2020	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE			
OEEO completed statistical analysis of workforce data and Barrier and Trends Analysis (BATA). This information will be used to develop strategies to support equal opportunity for all groups.			

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

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

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

Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWD) **No X**
- b. Cluster GS-11 to SES (PWD) **Yes X**

In reviewing Table B-1 and comparing PBGC’s PWD to the 12% benchmark, a trigger was identified in grades GS-11 through SLS and are reflected on the following graph:

GS-11	8.57%	GS-14	7.24%
GS-12	9.90%	GS-15	6.21%
GS-13	8.23%	SL	2.94%

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWTD) **Yes X**
- b. Cluster GS-11 to SES (PWTD) **Yes X**

In reviewing Table B-1 and comparing PBGC’s PWTD to the 2% benchmark, a trigger was identified in in the following grades as they are below the benchmark percentage:

GS-05	0.00%	GS-13	1.30%
GS-06	0.00%	GS-14	1.32%
GS-08	0.00%	GS-15	0.69%
GS-09	0.00%	SL	0.00%

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

Agency managers are informed of the numerical goal each year during the State of The Agency briefing. That information is also included in the annual MD-715 report which is available on the agency's intranet and the public internet.

Section II: Model Disability Program

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

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

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

Yes

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	8			Brandy Pelham, Supervisory HR Specialist, Recruitment & Replacement
Answering questions from the public about hiring authorities that take disability into account	1			Donald Beasley, Reasonable Accommodations Coordinator
Processing reasonable accommodation requests from applicants and employees	1	1		Donald Beasley, Reasonable Accommodations Coordinator
Section 508 Compliance			Section 508 Compliance Team, headed by the Office of Information Technology	Angela Watkins IT Specialist

Architectural Barriers Act Compliance				Terri Garner Industrial Specialist (WSD)
Special Emphasis Program for PWD and PWTD	1			Loraine Johnson, Special Emphasis Program Manager

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

Yes No

One employee has taken National Employment Law Institute’s Americans With Disabilities Act Workshop (2-days) One employee plans to take the same training later this year.

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 No

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.

The staff uses knowledge of the Schedule A hiring authority to identify job applicants with disabilities.

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

The agency uses the Schedule A Hiring Authority for persons with disabilities, the 30% or more disabled veteran hiring authority, and the Veterans Recruitment Appointment (VRA) authority to recruit PWD for positions in the permanent workforce.

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

The agency reviews the Schedule A documentation to make a determination regarding the candidate's eligibility for one or more of the hiring authorities listed above. Depending on the applicable authority, the candidate is referred on a Selection Certificate and the Hiring Official is advised as to what kind of Selection Certificate he or she has been issued as well as the interview and selection rules for that Selection Certificate (i.e., who must be interviewed and whether the Hiring Official must select any specific candidate[s]).

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 0 No 0 N/A 0

Yes. The agency provides Reasonable Accommodations training, which includes Schedule A Hiring. The training is mandatory for all managers and supervisors and is offered on a quarterly basis.

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.

(1) PBGC utilizes social media such as Facebook, Twitter and LinkedIn to attract persons with disabilities as a tool for recruitment and outreach; (2) PBGC uses the Diversity Recruitment feature on Monster Hiring Management (PBGC's electronic application system) to automatically communicate PBGC's vacancy announcements to disability organizations; (3) PBGC shares vacancy announcements, networks and collaborates with vocational rehabilitation offices in Maryland, Virginia and DC; (4) PBGC actively operates and promotes a Selective Placement Program and Workforce Recruitment Program to enhance recruitment and hiring of people with disabilities, including utilizing OPM's shared register of candidates with disabilities prior to posting vacancy announcements; (5) PBGC recruiters attend job fairs targeting persons with disabilities.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

When reviewing tables B7 for PWD Hires for Major Occupations, PWD are not represented in 4 of the 7 occupations where there were hires. PWTD are not represented in 6 of the 7 occupations where there were hires.

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

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

When reviewing tables B7 for PWD Hires for Major Occupations, PWD are not represented in 4 of the 7 occupations where there were hires at rates. PWTD are not represented in 6 of the 7 occupations where there were hires:

General Attorney-Series 0905 0% PWD & PWTD
Employee Benefits- Series 0958 0% PWD & PWTD
Financial Analysis- Series 1160 0% PWD & PWTD
IT-Series 2210 0% PWD & PWTD

PWTD are only represented in the Actuarial Series 1510 at 50% of the hires for major occupations.

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

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

When reviewing data table B9, PWD & PWTD are not represented on the Internal Promotions for Major Occupations.

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

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

When reviewing data table B9, PWD & PWTD are not represented on the Internal Promotions for Major Occupations. However, when reviewing table A10 Non-Competitive Occupations, they are represented at the relevant rates.

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.

PBGC offered the Project Management Certification Training Program, Leadership/Executive Coaching Program, and a wide variety of both technical and common needs training courses, making them open and accessible to all employees; (2) PBGC conducted exit interviews of all PBGC employees separating from employment, closely monitoring the reasons noted for separation by any PBGC employee with a disability; (3) PBGC continued its recognition program for management officials who make significant contributions toward the hiring and retention of disabled veterans at PBGC; (4) PBGC continued to operate a robust Special Emphasis Observance Program with dedicated resources, including special emphasis communications and events targeting persons with disabilities; (5) In FY 2016, PBGC introduced a Veterans Integration Program (VIP) which supports newly hired veterans, including disabled veterans, with their transition to the federal workforce.

B. Career Development Opportunities

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

For MD-715 purposes, career development programs as defined by EEOC, are formal programs that, upon completion, qualifies an employee for a promotion to a senior grade level. There's also a requirement that the employee must compete to participate in the career development program. Developmental programs provide the employee with the skills needed for the next level. However, PBGC has a variety of programs that require supervisory approval but not competition, including: (1) Project Management Certification; (2) executive coaching; (3) conflict coaching; (4) detail opportunities; (5) Pathways and HACU internships; (6) multiple training opportunities for employees at all grade levels; (7) training program for new supervisors. In addition, in FY 2017, the agency launched a pilot leadership development mentoring program for non-bargaining unit employees at the GS-13, 14 and 15 grade levels. All NBU employees at these

C. Awards

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

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

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

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

When reviewing table B13, PWTD are not represented in persons that received QSIs.

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

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

D. Promotions

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

a. SES

i. Qualified Internal Applicants (PWD) Yes No 0

ii. Internal Selections (PWD) Yes No 0

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Yes No 0

ii. Internal Selections (PWD) Yes No 0

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Yes No 0

ii. Internal Selections (PWD) Yes No 0

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Yes No 0

ii. Internal Selections (PWD) Yes No 0

When reviewing table B11, triggers were identified when no PWD were hired in any senior grades.

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

a. SES

i. Qualified Internal Applicants (PWD) Yes No 0

ii. Internal Selections (PWD) Yes No 0

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Yes No 0

ii. Internal Selections (PWD) Yes No 0

c. Grade GS-14

- i. Qualified Internal Applicants (PWD) Yes No 0
 - ii. Internal Selections (PWD) Yes No 0
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Yes No 0
 - ii. Internal Selections (PWD) Yes No 0

When reviewing table B11, triggers were identified when no PWD were hired in any senior grades.

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

When reviewing the data tables, triggers were identified when no PWD were hired in any senior grades.

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

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

When reviewing the data tables, triggers were identified when no PWTD were hired in any senior grades Levels.

5. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate

benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

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

b. Managers

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

c. Supervisors

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

When reviewing the B9 data tables, triggers were identified when no PWD were hired in any Supervisory positions.

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

a. Executives

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

b. Managers

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

c. Supervisors

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

When reviewing the B9 data tables, triggers were identified when no PWD were hired in any Supervisory positions.

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) | <input checked="" type="checkbox"/> Yes | No 0 |
| b. New Hires for Managers (PWD) | <input checked="" type="checkbox"/> Yes | No 0 |
| c. New Hires for Supervisors (PWD) | <input checked="" type="checkbox"/> Yes | No 0 |

When reviewing the B9 data tables, triggers were identified when no PWD were hired in any Executive, Manager, or Supervisory level positions.

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) | <input checked="" type="checkbox"/> Yes | No 0 |
| b. New Hires for Managers (PWTD) | <input checked="" type="checkbox"/> Yes | No 0 |
| c. New Hires for Supervisors (PWTD) | <input checked="" type="checkbox"/> Yes | No 0 |

When reviewing the B9 data tables, triggers were identified when no PWTD were hired in any Executive, Manager, or Supervisory level positions.

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 0 No N/A 0

Of the 6 Schedule A employees, 3 were converted in FY17, 1 was converted in FY18, 1 left the agency, and one has still not been converted.

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

a. Voluntary Separations (PWD)	Yes 0	<input type="checkbox"/> No <input checked="" type="checkbox"/> X
b. Involuntary Separations (PWD)	Yes 0	<input type="checkbox"/> No <input checked="" type="checkbox"/> 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.

a. Voluntary Separations (PWTD)	Yes 0	<input type="checkbox"/> No <input checked="" type="checkbox"/> X
b. Involuntary Separations (PWTD)	Yes 0	<input type="checkbox"/> No <input checked="" type="checkbox"/> X

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

NOT APPLICABLE

B. Accessibility of Technology and Facilities

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

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

Currently PBGC does not have Section 508 Complaint procedure on the PBGC website. We do have 508 Manual on the Intranet site.

<https://pbgcgov.sharepoint.com/EGD/PCD/Pages/Section508.aspx>

To fulfil this requirement, we will work with COLA to possibly post a miniature version of the content on PBGC.gov page along with the Complaint procedure in the near future.

COLA contact is Mike Rucki who can help with this for PBGC.gov. Mike did a quick look at websites of other agencies and found the following on some of them:

1. Section 508 Resources

For more information on Section 508, including the technical requirements, procurement policy and regulation, and a variety of online training opportunities, contact:

GSA Office of Government-wide Policy Center for IT Accommodation (CITA)

1800 F Street, N.W.

Room 1234, MC:MKC

Washington, DC 20405-0001

www.section508.gov

(202) 501-4906 (voice)

(202) 501-2010 (TTY)

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

<https://www.pbgc.gov/about/policies>

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

The agency will continue to operate a Section 508 Compliance Team whose mission is to develop a plan for raising awareness of Section 508 accessibility through assistive technologies; promote a shared commitment to making electronic information accessible to individuals with disabilities, in accordance with Section 508; and create, coordinate and channel resources and training to meet Section 508 needs across the agency.

C. Reasonable Accommodation Program

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

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

1-2 workdays is the average time frame for processing initial requests for reasonable accommodations

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

PBGC has been able to process timely RA request, and timely approvals of accommodations 100% of the time during the reporting period. Reasonable Accommodation Coordinator (RAC) conducts 6-7 RA trainings each FY. RAC also makes regular adjustments to how reasonable accommodations are provided on a consistent basis.

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 agency anticipates using existing reasonable accommodations procedures and personnel to process PAS requests.

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 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 N/A 0

- 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

B. EEO Complaint Data involving Reasonable Accommodation

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

Yes 0 No X N/A 0

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

Yes 0 No X N/A 0

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

NOT APPLICABLE

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.

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

Yes 0 No X

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

Yes 0 No 0 N/A X

- Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

Trigger 1	Persons with Disabilities(PWD) or Persons with Targeted Disabilities (PWTD) are not tracked in the US labor pool. However, EEOC has established goals for person’s with reportable disabilities (12%) and targeted disabilities (2%) Currently PBGC has a 8.94% representation rate for PWD and representation rate of 1.47% for PWTD.
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	*Triggers were identified through analysis of FY 2017 workforce tables B1-6, B7, B9, B11 and B13			
Barrier(s)	The Office of Equal Employment Opportunity completed a review and analysis of FY 2017 workforce and human resources data for PBGC major occupations, applicant flow, recruitment activities and new hires.			
Objective(s)	Increase the hiring of PWDs AND PWDT in Senior level and Supervisory level positions in PBGC by expanding the applicant pool for mission-critical occupations. Work with management and staff to identify any barriers and develop effective strategies and action plans. Provide recommendations to agency management and HRD to overcome any identified triggers/barriers.			
Responsible Official(s)		Performance Standards Address the Plan?		
EEO and HRD Directors and Staff, PBGC, Department Directors and Management Team		No		
Barrier Analysis Process Completed?		Barrier(s) Identified?		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	YES	Statistics on PWD & PWTD		
Complaint Data (Trends)	YES	Demographics of Complainants and bases and issues,		
Grievance Data (Trends)	NO			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	YES	462 Data		
Climate Assessment Survey (e.g., FEVS)	YES	Employee perceptions regarding the status of the workplace.		
Exit Interview Data	YES	Identify demographics of and trends		
Focus Groups	NO			
Interviews	NO			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	YES	EEO/HR Guidelines		
Other (Please Describe)				
Target Date	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Review data and documents included on "Part J Sources Reviewed" List	Yes	N/A	N/A

09/30/2019	Conduct focus groups to gather anecdotal information regarding employment related concerns and perceptions from PWD & PWTB.	Yes	N/A	N/A
09/30/2019	Implement Part I Barrier Analysis plan as it related to disabilities	Yes	N/A	N/A
Fiscal Year	Accomplishments			
FY 2018	None			

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

This is a new endeavor. As such, accomplishments have not been met at this time.

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

NOT APPLICABLE

5. 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.

NOT APPLICABLE

Appendix