

**Written Testimony**  
**Lorraine Cole, Director, Office of Minority and Women Inclusion**  
**Departmental Offices, U.S. Department of the Treasury**  
**Before the**  
**House Financial Services Committee Subcommittee on Diversity and Inclusion**  
**Holding Financial Regulators Accountable for Diversity and Inclusion: Perspectives from**  
**the Offices of Minority and Women Inclusion**  
**Tuesday, September 8, 2020**

Chair Beatty, Ranking Member Wagner, and distinguished Members of the Subcommittee, thank you for the opportunity to share my perspectives on how Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) has been the catalyst for driving diversity and inclusion efforts at Treasury’s Departmental Offices (Treasury).

“Diversity and Inclusion” has emerged as a discipline over the past fifty or so years. But I prefer to trace the origin of these values in this country to the words inscribed on the Great Seal of the United States, “E Pluribus Unum,” out of many, one. Of course, hundreds of thousands of people were enslaved<sup>1</sup> when we included that motto in the first design of the Great Seal in 1776.<sup>2</sup> So, our nation’s practices did not reflect our founding principles when that motto came to be. But it can be celebrated that this has been our nation’s longstanding ideal and our continuing quest to this day. So, I’m pleased to have this opportunity to share the ongoing work toward this end throughout Treasury’s headquarters.

I have had the privilege of serving as the OMWI Director since the office was first established in 2011. I have a firsthand perspective of Treasury’s accomplishments and challenges in diversity and inclusion for nearly a decade. I will briefly touch on a few of the highlights that are detailed in the ninth *Office of Minority and Women Inclusion Annual Report to Congress*,<sup>3</sup> as well as some noteworthy occurrences amid the current pandemic.

---

<sup>1</sup> According to the first U.S. Census, conducted in 1790, 14 years after American Independence, 694,280 people were enslaved. [https://www2.census.gov/library/publications/decennial/1790/number\\_of\\_persons/1790a-02.pdf](https://www2.census.gov/library/publications/decennial/1790/number_of_persons/1790a-02.pdf)

<sup>2</sup> <http://www.greatseal.com/committees/firstcomm/index.html>

<sup>3</sup> <https://home.treasury.gov/system/files/2016/OMWI-FY19-Annual-Report-FINAL-SUBMISSION.pdf>

**Treasury has continued to increase its use of minority-owned and women-owned businesses.** In FY 2019, more than one-third (34 percent) of the contract obligations for Treasury Departmental Offices, amounting to \$112 million, were awarded to minority-owned and women-owned businesses (accounting for overlapping categories). Contracts to women-owned businesses alone accounted for 23 percent, in the amount of \$75.9 million; and those to minority-owned businesses alone accounted for 25 percent, in the amount of \$82.1 million. These were among the highest levels since OMWI began tracking minority-owned and women-owned business contracting in FY 2011. Utilization of minority-owned and women-owned businesses is not limited to minor purchases, but occurs across five of the seven industry categories in which Treasury Departmental Offices spends the majority (approximately 77 percent) of contract award dollars.

Since March of this year, Treasury also has been tracking contracts made specifically for COVID-19 related purchases. This includes purchases for such goods and services as information technology design, wired telecommunications services, medical and cleaning supplies, and legal services. Nearly \$14 million (10 percent) for such purchases has been from minority-owned businesses and nearly \$15 million (11 percent) has been from women-owned small businesses.<sup>4</sup>

Treasury conducts targeted efforts to reach diverse businesses with information about doing business with Treasury and new contracting opportunities. In FY 2019, Treasury hosted a series of vendor outreach sessions reaching over 3,400 small, minority-owned, and women-owned businesses as prospective contractors. Special outreach to Historically Black Colleges and Universities has been conducted to better position them to compete for federal contracts.

**Treasury supports small and minority-owned financial institutions.** Of all the federal financial agencies represented at today's hearing, Treasury is the only one that is not a regulatory agency. Therefore, the provision of Dodd-Frank Act Section 342 pertaining to the diversity policies and practices of regulated entities<sup>5</sup> does not apply to Treasury. In 2018, Treasury

---

<sup>4</sup> Data extracted from FPDS-NG on August 27, 2020 including cumulative contract actions from March 13 through August 24, 2020

<sup>5</sup> Section 342 (b)(2)(C) of the Dodd-Frank Wall Street Reform and Consumer Protection Act

launched a program to engage large commercial banks in mentor relationships with small and minority-owned banks as protégés. The aim of the Treasury Bank Mentor-Protégé Program has been to increase the capacity of protégé banks. The program is serving to strengthen and sustain small and minority-owned banks to better serve low- to moderate-income communities and potentially serve as financial agents to Treasury. Currently, there are fourteen banks participating in the program and among them eight established mentor-protégé relationships. There are five large mentor banks and nine small and minority-owned protégé banks. Several other banks are in various stages of the relationship development process.

Secretary Mnuchin has been a strong advocate and partner in expanding the Bank Mentor Protégé Program and bringing minority business leaders together to advance such initiatives. In addition to hosting roundtables and smaller gatherings, this year Treasury hosted the Freedman's Bank Forum, convening over 200 professionals to engage in a dialogue that both informs and highlights the Federal government's programs and policies related to Minority Depository Institutions (MDI) and promotes opportunities that support economic development for all American communities.

**Treasury supported MDI participation as lenders in the Paycheck Protection Program (PPP).** The unprecedented PPP was established by the Coronavirus Aid, Relief and Economic Security Act (CARES Act) in response to the economic fallout of the COVID-19 pandemic. The PPP provided small businesses with critical funds to support payroll costs and certain other business expenses.

Throughout the PPP process, the SBA and Treasury worked tirelessly to expand the reach of the program to ensure that traditionally underserved communities have the resources they need, so that the broadest possible segment of small businesses would have the opportunity to access the PPP. Guidance was issued calling on lenders to redouble their efforts to assist eligible borrowers in underserved communities. On July 30, 2020, Treasury and SBA participated in a roundtable discussion with executives from MDIs; the discussion focused on the MDIs' experiences as lenders in the PPP, including their work to serve small businesses in low- and moderate-income communities.

As of August 8, 2020, when the PPP closed to new loan applications, 175 MDIs had approved over 123,000 PPP loans that provided more than \$10 billion to small businesses.<sup>6</sup> In addition, 27 percent of all PPP funds have been distributed to low- and moderate-income communities, which is in proportion to their percentage of the population.

**Treasury strives to increase workforce diversity at all levels of the agency.** The representation of Black and Asian employees in the overall workforce in Treasury’s headquarters is at or above nearly all of the relevant benchmarks. But there is a need for continued efforts to increase Hispanic representation in the overall workforce. We have placed particular emphasis on increasing race and gender diversity in senior management and executive positions, as well as in major mission-critical occupations. Our continuing challenge is to identify and mitigate any and all barriers to the employment, retention, and advancement of women and minority groups in specific areas of the workforce.

Treasury strives to promote a workplace culture that is inclusive, including increasing awareness of unconscious bias and promotion of management practices that ensure fairness. Toward that end, we provide a broad array of training to promote management competencies in inclusive diversity. This year, following the George Floyd tragedy, the eight OMWI agencies collaborated to conduct a joint training that brought together 9,000 of our employees for a frank conversation about race and racism.

**Treasury works to inspire tomorrow’s leaders.** We conduct the Treasury Scholars Program, which hosts talented minority student interns at Treasury’s headquarters. Students come from leading colleges and universities, including Historically Black Colleges and Universities and Hispanic-Serving Institutions. These students gain marketable skills working with managers in critical areas, such as national and international economic policy.

---

<sup>6</sup> <https://home.treasury.gov/system/files/136/SBA-Paycheck-Protection-Program-Loan-Report-Round2.pdf>

Treasury is in the process of establishing an agreement with the Economics Department at a Historically Black University to engage students in experiential learning experiences with economists at Treasury. This is part of a program sponsored by the American Economics Association to prepare talented undergraduate students with skills for successful doctoral studies in economics. We also hope that these experiences will inspire students to consider public service careers, as well as position them for future employment at Treasury.

**Treasury advances financial literacy.** The Secretary of the Treasury serves as Chair of the Financial Literacy and Education Commission (FLEC), comprising 23 federal government entities, created in 2003 to improve “the financial literacy and education of persons in the United States.” Treasury provides expertise and support to the FLEC, and works to empower more Americans to create financially secure futures for themselves and for their families.

In FY 2019, Treasury and FLEC issued reports on financial literacy reform and best practices for financial literacy and education in higher education. The first report, issued by Treasury and entitled *Federal Financial Literacy Reform: Coordinating and Improving Financial Literacy Efforts*,<sup>7</sup> includes a number of recommendations to enhance coordination of federal financial education activities and to prioritize key areas of basic financial capability (including access to financial services, saving, and credit), retirement savings and investor education, housing counseling, postsecondary education, and military and their families.

The second report, issued by FLEC and entitled *Best Practices for Financial Literacy and Education at Institutions of Higher Education*,<sup>8</sup> provides recommendations for higher education institutions to deliver effective financial literacy education to help students make informed decisions and avoid pitfalls associated with financing education. Best practices for evidence-based, effective financial education covered in the report include:

- Providing clear, timely, and customized information to inform student borrowing
- Effectively engaging students in financial literacy and education

---

<sup>7</sup> <https://home.treasury.gov/system/files/136/FFLRCoordinatingImprovingFinancialLiteracyEfforts.pdf>

<sup>8</sup> <https://home.treasury.gov/system/files/136/Best-Practices-for-Financial-Literacy-and-Education-at-Institutions-of-Higher-Education2019.pdf>

- Targeting different student populations by use of national, institutional, and individual data
- Communicating importance of graduation and major on repayment of student loans
- Preparing students to meet financial obligations upon graduation.

This report was highlighted at a November 2019 event attended by a wide array of higher education institutions. The report was shared widely by the Education Department's Federal Student Aid and has been widely cited by higher education organizations.

Throughout 2020, Treasury's coordination of the FLEC has proven useful in response to the financial challenges stemming from the COVID-19 national emergency. Federal agencies have worked together to meet these challenges and provide resources and tools to a wide range of diverse populations. For example, IRS has worked with the FDIC to help unbanked people find and open bank accounts in order to quickly and safely receive their Economic Impact Payments (EIP); HHS's [www.youth.gov](http://www.youth.gov) website has disseminated information on access to EIP to youth-serving organizations, such as those serving foster youth; and the Federal Trade Commission has worked with Treasury to inform Americans about possible EIP scams.

**Treasury invests in underserved communities.** In FY 2019, Treasury continued to invest millions of dollars to support underserved communities through the Community Development Financial Institutions Fund (CDFI Fund) and the Small Business Lending Fund (SBLF). CDFIs are mission-driven financial institutions (banks, credit unions, loan funds, and venture capital funds) certified by the Department of the Treasury's CDFI Fund. They share a common goal of expanding economic opportunity in the most distressed and underserved communities. CDFIs provide a wide range of lending, including consumer, small business, affordable housing, commercial real estate, charter schools, health care centers, community services, non-profits.

Over the past decade, CDFI Fund program recipients have reported that nearly 40% of their lending activity, totaling \$19.2 billion, has been in predominantly minority communities (census tracts where 50% or more of the population is part of a minority community).

Since its inception more than twenty-five years ago, the CDFI Fund has provided \$2.6 billion through its flagship assistance program, the CDFI Program. In FY 2019 alone, the CDFI Fund granted more than \$197 million in CDFI Program awards to support affordable lending, small business lending, and homeownership loans nationwide, as well as technical assistance activities. \$18.2 million of those funds was specifically targeted for Persistent Poverty Counties—those counties where 20% or more of the population has lived in poverty over the past 30 years.

The Small Business Lending Fund (SBLF) was established by the Small Business Jobs Act of 2010. The fund specifically is dedicated to providing capital to qualified community banks and CDFI Fund certified community development loan funds to stimulate small business lending in communities across the United States. The purpose of the SBLF is to encourage community banks, loan funds, and small businesses to work together, help create jobs, and promote economic growth in these communities.

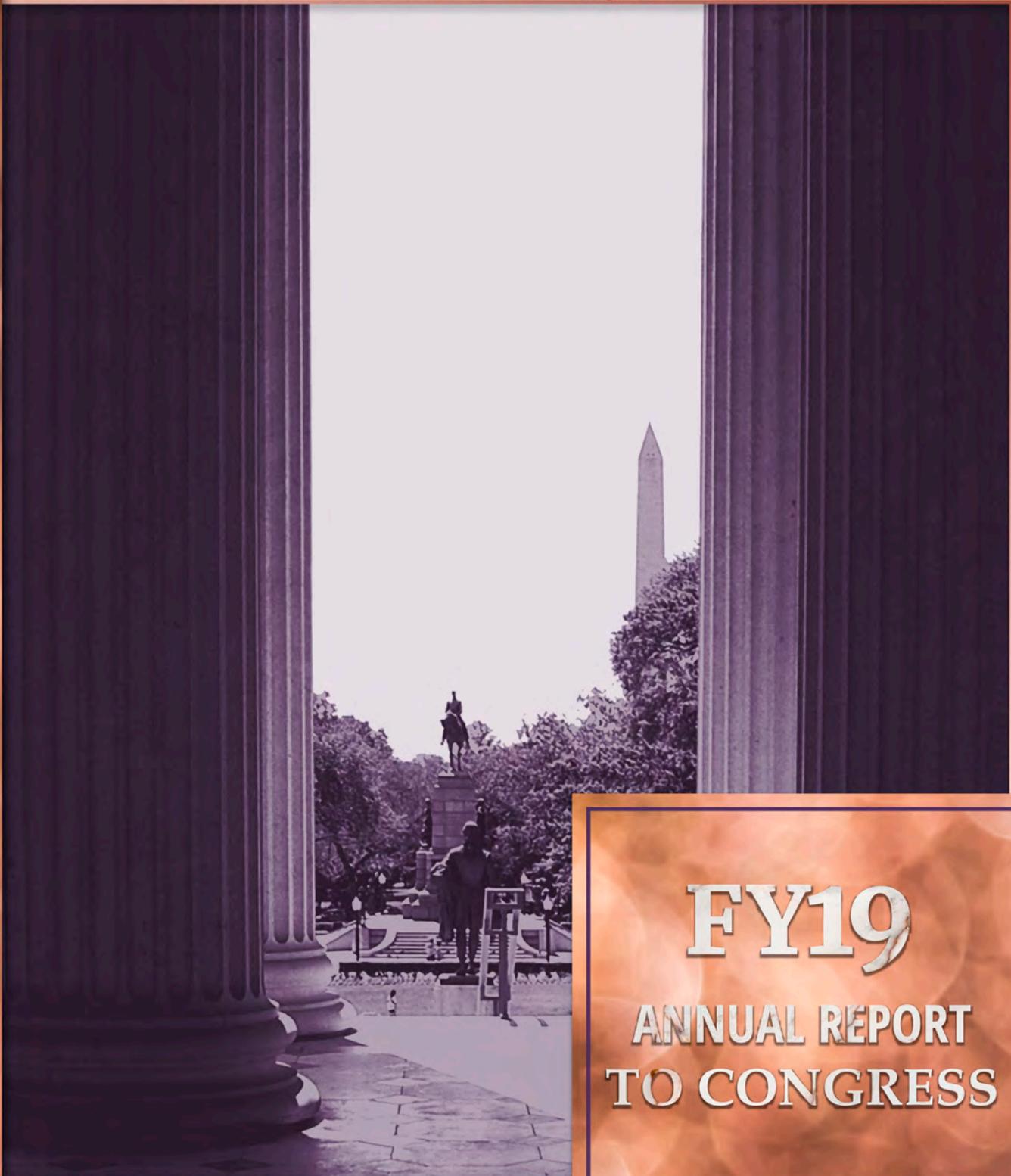
Treasury invested over \$4.0 billion that has been leveraged by lending institutions participating in SBLF to increase their lending to small businesses that support local economies across the nation. From this \$4 billion investment in 2011, there has been \$19.1 billion in cumulative lending through the end of June 2019 (the third quarter of FY 2019).

In conclusion, Treasury has made much progress, but we acknowledge that much work remains. We can achieve more and we will. Through the efforts of the OMWI team to methodically quantify and qualify our progress against benchmarks and aspirations, we know where gaps exist, barriers reside, and challenges remain. We also know that leadership commitment, accountability measures, and strategic action are the formula for advancing positive changes toward inclusive diversity.

As Americans, we live in one of the most multi-ethnic, multi-racial, and culturally diverse nations in the world. In the spirit of “E Pluribus Unum,” we take seriously our obligation to ensure that those who do the work of Treasury, as employees, contractors, or financial agents, are representative of the beneficiaries of our work—the American people.

---

**OMWI**  
Office of Minority  
and Women Inclusion



**FY19**  
**ANNUAL REPORT**  
**TO CONGRESS**

---

DEPARTMENT OF  
THE TREASURY



# TABLE OF CONTENTS

MESSAGE FROM THE CHIEF DIVERSITY & INCLUSION OFFICER .....	1
EXECUTIVE SUMMARY .....	3
OVERVIEW .....	5
<b>BUSINESS DIVERSITY &amp; INCLUSION</b>	
Minority-Owned and Women-Owned Business Utilization .....	9
Trends in Minority-Owned Business Utilization .....	10
Trends in Women-Owned Business Utilization .....	11
Trends in MWOB Small Business Utilization .....	12
MWOB Participation in Specific Acquisition Categories .....	13
Good Faith Effort Mandate .....	16
Financial Agent Authority .....	17
<b>INITIATIVES &amp; ACCOMPLISHMENTS</b>	
Capacity Building .....	19
Bank Mentor Protégé Program .....	19
Industry Outreach .....	19
Historically Black Colleges and Universities Contracting .....	22
Economic Empowerment .....	22
Community Development Financial Institutions Fund .....	22
Small Business Lending Fund .....	23
Accountability .....	23
Challenges .....	24
Fiscal Year 2020 Plans .....	24
<b>WORKFORCE DIVERSITY &amp; INCLUSION</b>	
Workforce Demography .....	27
Racial, Ethnic and Gender Profiles .....	27
Benchmark Comparisons .....	28
Senior Management .....	29
All Grade Groupings .....	30
Hiring and Attrition .....	31
Mission Critical Occupations Trends by Race/Ethnicity and Gender .....	33
Student Employment .....	35
Workplace Inclusion .....	37
New IQ Inclusion Quotient .....	37
Best Places to Work Ranking .....	37
<b>INITIATIVES ACCOMPLISHMENTS</b>	
Organizational Transformation .....	39
Quantitative and Qualitative Analysis .....	39
Inclusive Diversity Awareness and Training .....	39
Community Empowerment .....	41
Outreach .....	41
Financial Literacy .....	41
Accountability .....	42
Challenges .....	43
Fiscal Year 2020 Plans .....	45
<b>APPENDIX</b>	
List of Abbreviations .....	46





# MESSAGE FROM THE CHIEF DIVERSITY & INCLUSION OFFICER



**Lorraine Cole, Ph.D.**

Chief Diversity and Inclusion Officer  
Office of Minority and Women Inclusion

'Diversity and Inclusion' has emerged as a discipline over the past fifty or so years. But, I contend that the origin of these values in this country can be traced back to the founding of this nation and the ideal of "E Pluribus Unum" inscribed on the Great Seal of the United States. That Latin phrase, which translates to "From many, one", encapsulates what we have come to mean as 'diversity and inclusion.' So, in the spirit of E Pluribus Unum, this ninth *Office of Minority and Women Inclusion Annual Report to Congress* details statistical data, accomplishments, and challenges in workforce and business diversity and inclusion throughout Treasury's headquarters in fiscal year 2019. For example:

- ✓ *We maintained an upward trajectory.* The percentage and dollar amounts of contract obligations with minority-owned and women-owned businesses were among the highest ever.
- ✓ *We supported community financial institutions.* OMWI and the Bureau of Fiscal Services Office of Revenue Collections expanded an unprecedented Bank Mentor-Protégé Program between large banks and small financial institutions, including minority-owned banks.
- ✓ *We reached diverse businesses.* The Office of Small Disadvantaged Business Utilization hosted a series of vendor outreach sessions reaching over 3,400 small, minority-owned, and women-owned businesses as prospective contractors, including Historically Black Colleges and Universities.
- ✓ *We invested in underserved communities.* Millions of dollars supported community investment through the Community Development Financial Institutions Fund and the Small Business Lending Fund.
- ✓ *We opened minds.* Through training offered by OMWI and the Treasury Executive Institute, a broad array of opportunities to promote competencies in inclusive diversity was accessible to all Treasury employees.
- ✓ *We advanced financial literacy.* The Office of Consumer Policy coordinated the issuance of two reports on financial literacy reform and best practices for financial literacy and education in higher education.
- ✓ *We achieved benchmarks.* The overall workforce in Treasury's headquarters is *racially* diverse, with Black and Asian employees represented at or above nearly all of the relevant benchmarks.
- ✓ *We inspired tomorrow's leaders.* OMWI hosted 12 talented minority students in the Treasury Scholars Program, increasing the diversity among all interns by 18 percent in Treasury's headquarters.

Much progress has been made, but much work remains. We can achieve more and we will. Through the efforts of the OMWI team to methodically quantify and qualify our progress against benchmarks and aspirations, we know where gaps exist, barriers reside, and challenges remain. We also know that leadership commitment, accountability measures, and strategic action are the formula for advancing positive changes toward inclusive diversity.

As Americans, we live in one of the most multi-ethnic, multi-racial, and culturally diverse nations in the world. As this report shows, we take seriously our obligation to ensure that those who do the work of Treasury, as either employees or contractors, are representative of the beneficiaries of our work – the American people.

*Lorraine Cole*

**Lorraine Cole, Ph.D.**

Chief Diversity and Inclusion Officer  
Office of Minority and Women Inclusion  
**U.S. Department of the Treasury**  
Departmental Offices

**FY 2019**  
**October 1, 2018 – September 30, 2019**

**BY THE NUMBERS**

**24**

PERCENTAGE OF WOMEN PERMANENT EMPLOYEES AT THE SENIOR EXECUTIVE SERVICE (SES) LEVEL

FEVS INCLUSION QUOTIENT SCORE

**63.49**

PERCENTAGE OF MINORITY PERMANENT EMPLOYEES AT THE SENIOR EXECUTIVE SERVICE (SES) LEVEL

**14**

**44**

PERCENTAGE OF WOMEN PERMANENT EMPLOYEES

**36**

PERCENTAGE OF RACIAL/ETHNIC MINORITY PERMANENT EMPLOYEES

**1,760**

TOTAL NUMBER OF PERMANENT EMPLOYEES

**\$75,996,188**

TOTAL AMOUNT OF CONTRACT DOLLARS OBLIGATED WITH WOMEN-OWNED BUSINESSES

**23.1**

PERCENTAGE OF CONTRACT OBLIGATIONS WITH WOMEN-OWNED BUSINESSES

**25**

PERCENTAGE OF CONTRACT OBLIGATIONS WITH MINORITY-OWNED BUSINESSES

**54.75**

**FEVS FAIRNESS SCORE**

**\$82,150,086**

TOTAL AMOUNT OF CONTRACT DOLLARS OBLIGATED WITH MINORITY-OWNED BUSINESSES

# EXECUTIVE SUMMARY

**The Office of Minority and Women Inclusion (OMWI)** The Office of Minority and Women Inclusion (OMWI) in the Department of the Treasury Departmental Offices was established by the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) § 342 (P.L. 111-203) and is responsible for all matters relating to diversity in management, employment, and Treasury’s business activities in Departmental Offices, excluding the enforcement of statutes, regulations, or executive orders pertaining to civil rights. This ninth report is submitted to Congress pursuant to the Dodd-Frank Act regarding the actions taken by Treasury and the OMWI during Fiscal Year (FY) 2019.



**BUSINESS DIVERSITY.** Despite the absence of mandated contracting goals for other than small businesses, Treasury Departmental Offices’ commitment to minority-owned and women-owned business (MWOB) utilization has remained strong. In FY 2019, Treasury Departmental Offices’ total procurement contracts for goods and services represented \$329 million in obligations (with 1,754 contract actions), with over one-third (34 percent) of contract dollars totaling \$112 million going to either minority-owned or women-owned businesses. A total of \$82 million, or 25 percent of total contract obligations, was awarded to minority-owned businesses. A total of \$76 million, or 23 percent of total contract

obligations, was awarded to women-owned businesses of all sizes. Among the small business categories, contract obligations to small disadvantaged businesses represented 6 percent of all Departmental Offices contracts; and contract obligations to women-owned small businesses represented 17 percent – both above the 5 percent statutory goal.

Since OMWI first began tracking MWOB contracting in 2011, there has been an almost steady upward trajectory in MWOB utilization. The percentage and dollar amounts of minority-owned business and women-owned business contract obligations by Treasury Departmental Offices were among the highest ever in FY19. These achievements were accomplished without mandated goals as incentives for other than specific small business categories. With such strong performance in the utilization of minority-owned and women-owned businesses in FY 2019, it is difficult to propose or predict challenges.

However, with the implementation of category management strategies as a recent directive for the government-wide acquisition community, there remains the potential for a negative impact on contracting with minority-owned and women-owned businesses as an unintended consequence, particularly in specific industries where such businesses are not abundantly present. Therefore, even though no particular challenge in this regard was noted in FY 2019 for the second consecutive, this is an area where continued monitoring will be important.

**WORKFORCE DIVERSITY.** In FY 2019, the Treasury Departmental Offices permanent workforce of 1,760 represented about 2 percent of the total Treasury-wide workforce. More than one-third (36%) of Treasury Departmental Offices permanent employees across all grade levels are racial or ethnic minorities. Blacks represent the largest of the minority groups at 20 percent. Asians and Hispanics comprise 10 percent and 5 percent, respectively. Native Hawaiian or Other Pacific Islanders, American Indian or Alaska Natives, and those who identify themselves as Two or More Races each represent less than 1 percent of the total Treasury Departmental Offices permanent workforce. Within senior management positions, minorities represent 18 percent of the permanent GS-15 level, and 14 percent of the permanent senior executive service (SES) positions. With regard to gender representation within Treasury Departmental Offices, 44 percent are women and 56 percent are men. Within senior management positions, women comprise 41 percent of the permanent GS-15 level and 24 percent of the permanent SES positions.

Treasury Departmental Offices is committed to adopting leading edge strategies to maintain accountability, transform the workplace culture, analyze data, and conduct outreach as we aim to secure a high performing workforce drawn from a diverse pool of candidates. The biggest challenges to implementing the workforce diversity provisions of Dodd-Frank Act § 342 have been hiring restrictions, retention rates, identifying and mitigating underlying root causes for underrepresentation in specific racial/ethnic and gender categories, and perceptions of the workplace culture.

First, throughout FY 2018, there was a personnel cap imposed for Treasury Departmental Offices, which maintained staffing at specified levels and, thus, constrained hiring and prospects to further impact workforce diversity in FY 2019. The hiring rates in FY 2019 were comparable (only +/- 1 percent). Over a period of 5 years, Hispanic employees have been hired at an average of 6 percent and attrition rates remain unchanged at 5 percent. Among minority groups, Hispanic employees at Treasury Departmental Offices are represented at a lower rate compared to the Treasury workforce and the federal government workforce (12 percent, 9 percent, respectively).

Second, hiring constraints were compounded by retention rates. Black employees left at a significantly higher rate in FY 2019 than the preceding four years at Treasury Departmental Offices. In FY2019, the separation rate was the highest for Black employees which was 6 percent greater (23 percent) than FY 2018. Although the separation rate of minorities (36 percent) was slightly higher than the hiring rate of minorities (34 percent); it is important to note the significant change from one year to the next. The hire rate of minorities increased from FY 2018 to FY 2019 by 9 percent improving the ratio of separation to hire rate of minorities.

Third, the continuing challenge is to identify and mitigate the root causes and systemic barriers to the employment and advancement of women and racial/ethnic minority groups in specific areas of the workforce. There is an overall underrepresentation of Hispanics in the workforce below nearly all benchmarks, in senior management and senior executive positions, and in mission critical occupations. Similarly, there is an underrepresentation of women, Blacks, and Asians in senior executive positions, at specific senior management levels, and in certain mission critical occupations.

Fourth, employee perceptions of fairness (54.75 in FY 2019 and 53.28 in FY 2018) have been consistently below the acceptable score of 65 percent on the inclusion quotient of the annual Federal Employee Viewpoint Survey (FEVS). On rankings across the federal government of Best Places to Work, Treasury Departmental Offices ranked in the third quartile (312 out of 420) among federal agency subcomponents on this quotient; ranked in the third quartile (308 out of 414) on the subcategory of "support for diversity"; and ranked in the third quartile (259 out of 413) on the subcategory of "effective leadership: fairness."

# OVERVIEW

This ninth annual report is submitted to Congress pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) § 342 (P.L. 111-203) regarding the actions taken by Treasury and the Office of Minority and Women Inclusion, Departmental Offices (OMWI) during Fiscal Year (FY) 2019.<sup>1</sup>

## U.S. DEPARTMENT OF THE TREASURY

### *Mission*

Maintain a strong economy and create economic and job opportunities by promoting conditions that enable economic growth and stability at home and abroad; strengthen national security by combating threats and protecting the integrity of the financial system; and manage the U.S. government's finances and resources effectively.

### GOALS

- 1** → **Boost U.S. Economic Growth**
- 2** → **Promote Financial Stability**
- 3** → **Enhance National Security**
- 4** → **Transform Government-wide Financial Stewardship**
- 5** → **Achieve Operational Excellence**

1. Refer to <https://legcounsel.house.gov/Comps/Dodd-Frank%20Wall%20Street%20Reform%20and%20Consumer%20Protection%20Act.pdf>. For the purposes of this report and consistent with Dodd Frank Act § 342 (g) (3), the standards employed by the Office of Personnel Management (OPM), and the Equal Employment Opportunity Commission (EEOC), the definition used for the term "minority" is: Hispanic or Latino; Black or African American; Asian; Native Hawaiian or Other Pacific Islander; and American Indian or Alaska Native.

# U.S. DEPARTMENT OF THE TREASURY

Throughout its rich history, Treasury's core mission has not changed. With nearly 100,000 employees in its ranks, Treasury is still the steward of the U.S. economy – taking in revenue, paying bills, and, when appropriate, borrowing and investing public funds. In more recent years, Treasury's role has expanded to being a leader in safeguarding and growing the nation's economy.

Treasury is organized into the Departmental Offices (i.e., Treasury's headquarters), seven operating bureaus, and three inspectors general. The Departmental Offices are primarily responsible for policy formulation, while the bureaus are primarily the operating units of the organization. Internally, the Departmental Offices are responsible for overall management of Treasury.

**The Office of Domestic Finance**

**The Office of Economic Policy**

**The Office of General Counsel**

**The Office of  
International Affairs**

**The Office of Legislative Affairs**

**The Office of Management**

**The Office of Public Affairs**

**The Office of Tax Policy**

**The Office of Terrorism  
and Financial Intelligence**

**The Treasurer  
of the United States**

## Treasury Departmental Offices (Headquarters)

- **Domestic Finance** works to preserve confidence in the U.S. Treasury market, effectively manage federal fiscal operations, strengthen financial institutions and markets, promote access to credit, and improve financial access and education in service of America's long-term economic strength and stability.
- **Economic Policy** reports on current and prospective economic developments and assists in the determination of appropriate economic policies.
- **The Office of General Counsel** provides legal and policy advice to the Secretary and other senior Departmental officials.
- **International Affairs** protects and supports U.S. economic prosperity and national security by working to help ensure the most favorable external environment for sustained jobs and economic growth in the United States.
- **Legislative Affairs** develops strategies to implement legislative initiatives, communicates Treasury's positions to the Congress, and keeps the Department informed of Congressional objectives, concerns, activities, and interests.
- **Management** is responsible for managing the Department's financial resources and overseeing Treasury-wide programs, including human capital, information technology, acquisition, and diversity issues.
- **Public Affairs** develops and implements communications strategy for the Department and advises officials within the Department and its bureaus how best to communicate issues and priorities of public interest.
- **Tax Policy** develops and implements tax policies and programs, reviews regulations and rulings to administer the Internal Revenue Code, negotiates tax treaties, and provides economic and legal policy analysis for domestic and international tax policy decisions. Tax Policy also provides revenue estimates for the President's Budget.
- **Terrorism and Financial Intelligence** marshals the Department's intelligence and enforcement functions with the twin aims of safeguarding the financial system against illicit use and combating rogue nations, terrorist facilitators, weapons of mass destruction (WMD) proliferators, money launderers, drug kingpins, and other national security threats. The office is responsible for the review and analysis of domestic economic issues and developments in the financial markets.
- **The Treasurer of the United States** has direct oversight of the U.S. Mint and Fort Knox and is a key liaison with the Federal Reserve. Additionally, the Treasurer oversees the Office of Consumer Policy at Treasury and serves as a senior advisor to the Secretary on community development and engagement.

# OFFICE OF MINORITY & WOMEN INCLUSION PRIMARY DUTIES

**The Office of Minority and Women Inclusion (OMWI)** was established on January 21, 2011 in accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank) § 342 (P.L. 111-203). The express statutory authority of OMWI covers Treasury Departmental Offices. For Treasury Departmental Offices, OMWI is responsible for all matters relating to diversity in management, employment, and business activities, excluding the enforcement of statutes, regulations, or executive orders pertaining to civil rights. OMWI is required to develop standards for equal employment opportunity

and the racial, ethnic, and gender diversity of the workforce. OMWI is also required to take steps to seek diversity, in a manner consistent with applicable law, in the workforce of Treasury Departmental Offices at all levels of the organization, but particularly within senior management. In addition to workforce diversity, OMWI is charged with seeking increased participation of minority-owned and women-owned businesses in the programs and contracts of the agency. OMWI is responsible for establishing procedures to determine if agency contractors and their subcontractors have made good faith efforts to include minorities and women in their workforce.<sup>2</sup>

The Chief Diversity and Inclusion Officer for Treasury Departmental Offices is the Director of OMWI and serves as the chief strategist to the Treasury Secretary and chief advisor to the Assistant Secretary for Management of efforts pertaining to workforce and business diversity and inclusion. The OMWI Director directly reports to Assistant Secretary for Management on a day-to-day basis and has a dotted reporting line to the Secretary of the Treasury. Throughout 2019 and in accordance with Dodd Frank § 342, Lorraine Cole, Chief Diversity and Inclusion Officer, held meetings with Treasury Secretary Steven T. Mnuchin and the Deputy Secretary to provide briefings on relevant aspects of workforce and business diversity and inclusion, consult on new initiatives, and recommend leadership action, as necessary.

**Develop standards for diversity of the workforce and senior management**

**Support recruitment/advancement efforts toward workforce diversity at all levels**

**Develop standards for increased minority-owned and women-owned business contracts**

**Develop standards for technical assistance to businesses**

**Develop procedures for contracting that considers the diversity of the applicant**

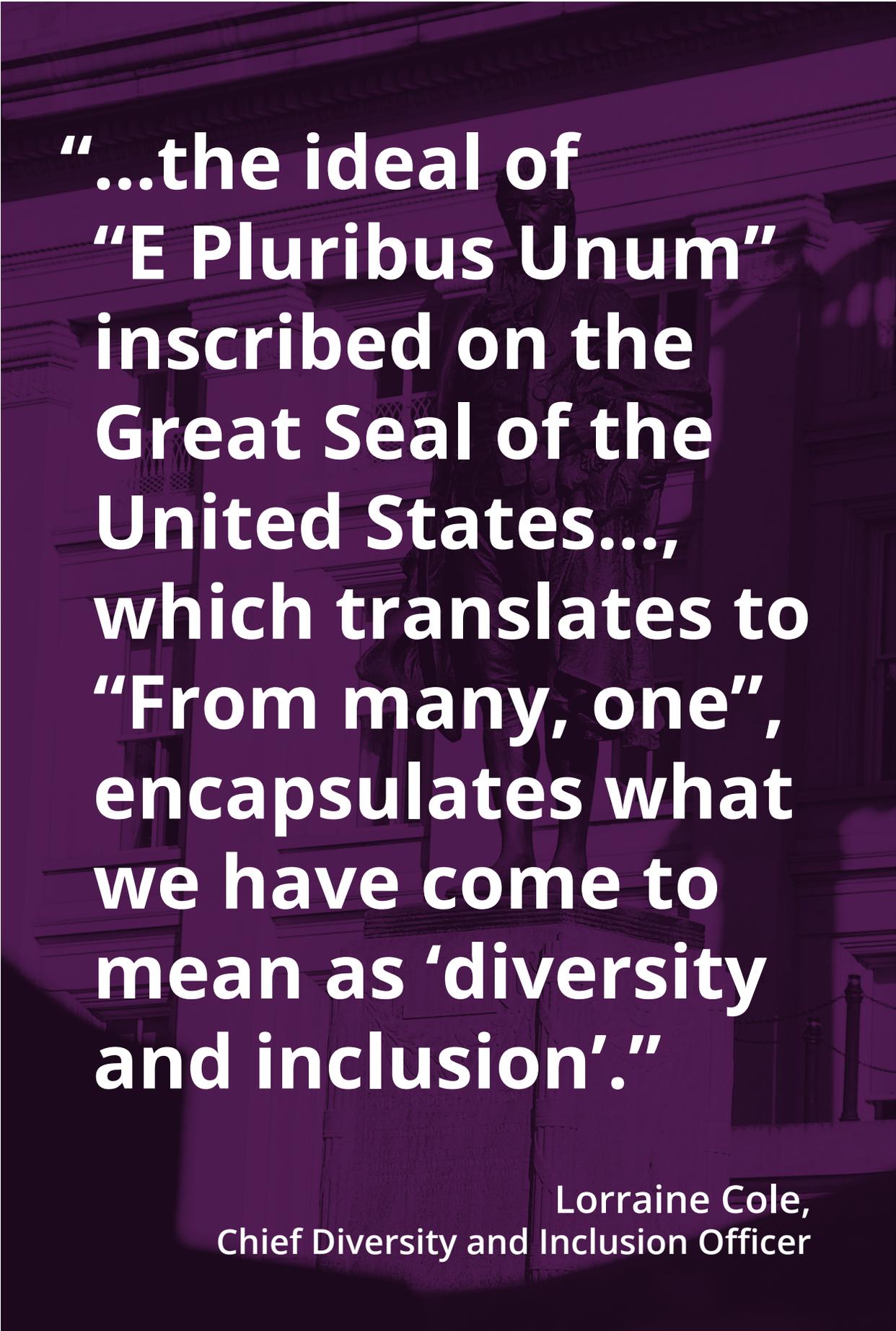
**Develop standards to determine whether contractors and subcontractors are making a good-faith effort to include minorities and women in their workforce**

**Submit an annual report to Congress**

**Conduct data analysis and produce internal reports**

**Provide advice and advocacy**

2. It should be noted that Treasury Departmental Offices is not a financial regulatory agency. Thus, the requirement in the Dodd-Frank Act § 342 to assess the diversity policies and practices of entities regulated by the agency is not applicable to the Treasury Departmental Offices OMWI.



**“...the ideal of  
“E Pluribus Unum”  
inscribed on the  
Great Seal of the  
United States...,  
which translates to  
“From many, one”,  
encapsulates what  
we have come to  
mean as ‘diversity  
and inclusion’.”**

**Lorraine Cole,  
Chief Diversity and Inclusion Officer**

# BUSINESS DIVERSITY & INCLUSION

## MINORITY-OWNED AND WOMEN-OWNED BUSINESS UTILIZATION

Of the twenty agencies and federal reserve banks with an OMWI, Treasury Departmental Offices is one of the few required to adhere to the Federal Acquisition Regulation (FAR) for the procurement of goods and services. The FAR requires a full and open competitive process for federal procurements, with some exceptions for small business set-asides under specific circumstances. Additionally, it is important to note that, due to legal restrictions pertaining to civil rights, no specific goals can be established for contracting with minority-owned businesses regardless of size or women-owned businesses, with the exception of certain small business parameters.

Treasury-wide, the total (appropriated and non-appropriated) contract procurement decreased from \$4.8 billion in FY 2018 to \$4.6 billion in FY 2019. Within Treasury Departmental Offices, procurement for products and services increased from a total of \$313 million in FY 2018 (with 1,746 contract actions) to \$329 million in FY 2019 (with 1,754 contract actions). Despite the absence of mandated contracting goals for other than small businesses, the commitment to minority-owned and women-owned business utilization within Treasury Departmental Offices remained strong in FY 2019, with 34 percent of contract dollars totaling \$112 million going to either minority-owned or women-owned businesses (MWOB). Specifically, \$76 million (23 percent) of contract obligated award dollars went to women-owned businesses and \$82 million (25 percent) went to minority-owned businesses (dollar amounts awarded to minority women-owned businesses are included within each category). (Refer to Table 1) This level of contracting with minority-owned businesses declined slightly from FY 2018 levels while the FY 2019 percentage of women-owned business contract obligations increased slightly from that in FY 2018. Both remain among the highest percentages since OMWI began reporting in 2011.

**Table 1**

FY 2019 Treasury Departmental Offices

Contract Obligations by Demographic Groups, Total Awards, and Percentages of Awards\*

Category	Total Awards in Dollars	Percentage of Awards
<b>All Departmental Offices Awards</b>	<b>\$329,258,644</b>	<b>100.0%</b>
Neither Minority-owned nor Women-owned	\$216,815,876	65.8%
Minority-owned or Women-owned <sup>3</sup>	\$112,442,768	34.2%
Woman-owned	\$75,996,188	23.1%
Minority-owned <sup>4</sup>	\$82,150,087	25.0%
Asian American <sup>5</sup>	\$50,011,805	14.7%
Black American	\$17,353,172	5.1%
Hispanic American	\$15,316,871	4.5%
Native American	\$1,937,971	0.6%
Other Minority <sup>6</sup>	\$2,072,078	0.6%

\*Contracting dollar amounts are based on Federal Procurement Data System (FPDS-ng) data extracted March 16, 2020 for FY19 using the following filters:

Awarding Agency Name: 20 Department of the Treasury | Awarding Sub Agency Name: 2001 Departmental Offices, 2050 Internal Revenue Services

Funding Agency Name: 20 Department of Treasury | Funding Sub Agency Name: 2001 Departmental Offices

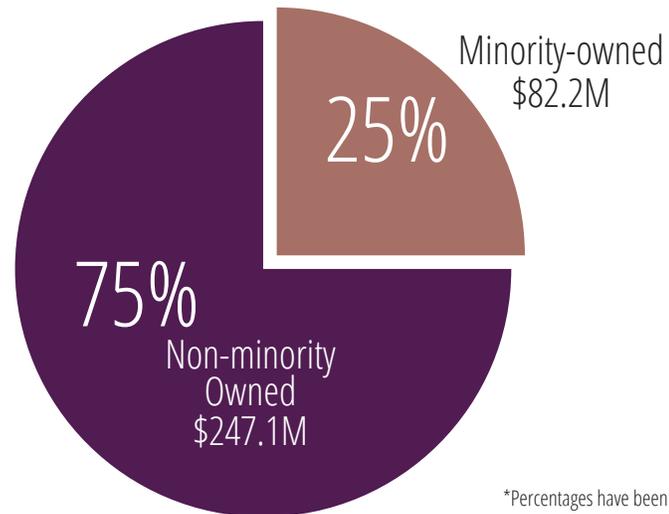
- The total amount of awards to minority women-owned businesses was \$45,703,507. However, awards to businesses that are both minority- and women-owned are counted within Federal Procurement Data System (FPDS-ng) in all applicable individual minority- and women-owned individual categories. Therefore, to ensure there was no duplicate counting of overlapping categories of race/ethnicity and gender, the total dollars and percentages have been reduced to adjust for the \$45,703,507.
- The sum of the award dollars to businesses within the minority-owned sub-categories does not equal the total minority-owned award amount because several awards under the minority categories were not identified in the reporting system as minority-owned businesses.
- "Asian American" includes both Subcontinent Asian (Asian-Indian) American-owned businesses and Asian Pacific American-owned businesses.
- "Other minority" means those businesses designating "minority-owned" in the System for Award Management, but not designating Asian American, Black American, Hispanic American, or Native American.

## TRENDS IN MINORITY-OWNED BUSINESS UTILIZATION

In FY 2019, utilization of minority-owned businesses overall within Treasury Departmental Offices has decreased relative to total spending compared to FY 2018 (\$87 million or 28 percent). A total of \$82.2 million or 25 percent of the total in contract obligations were awarded to minority-owned businesses (Figure 1).

Contract obligations to minority-owned businesses by specific racial and ethnic designation of the ownership for the five most recent consecutive years are listed in Table 2.<sup>7</sup>

**Figure 1**  
FY 2019 Treasury Departmental Offices  
Overall Contract Obligations by Minority Status\*



\*Percentages have been rounded to whole numbers

**Table 2**  
Treasury Departmental Offices  
Overall Contract Obligations by Specific Racial or Ethnic Minority Group\*, FY 2015-2019

Category	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015
Minority-owned Businesses	\$82 million (25%)	\$87 million (28%)	\$72 million (24%)	\$59 million (18%)	\$43 million (17%)
Black-owned	\$17 million	\$16 million	\$14 million	\$14 million	\$14 million
Hispanic-owned	\$15 million	\$14 million	\$16 million	\$10 million	\$5 million
Asian-owned	\$50 million	\$51 million	\$42 million	\$24 million	\$22 million
American Indian-owned	\$1 million	\$7 million	\$1 million	\$1 million	\$4 million
Non-minority Businesses	\$247 million (75%)	\$226 million (72%)	\$230 million (76%)	\$274 million (83%)	\$205 million (83%)

\* Contracting dollar amounts are based on Federal Procurement Data System (FPDS-ng) data extracted March 16, 2020 for FY19; dollars and percentages are rounded.

7. Some businesses have self-identified in more than one category; their contract amounts are reflected within all categories indicated.

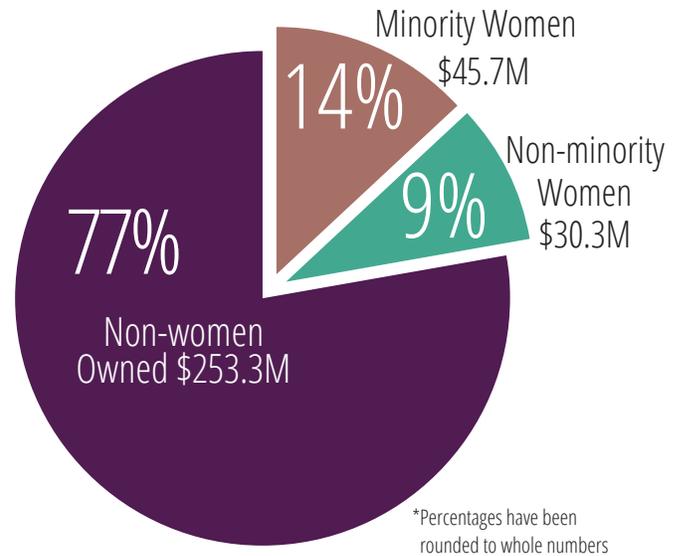
## TRENDS IN WOMEN-OWNED BUSINESS UTILIZATION

In FY 2019, there was a slight increase in the contracts awarded to women-owned businesses within Treasury Departmental Offices compared to FY 2018 (\$70 million or 22 percent). In FY 2019, a total of \$76 million or 23 percent of the total contract obligations were awarded to women-owned businesses, including minority women (Figure 2).

Contract obligations to women-owned businesses, including minority status, for the five most recent consecutive years are listed in Table 3. Percentage and dollar amounts of contract obligations with minority-owned businesses increased in FY 2019 (23 percent and \$76 million) compared to FY 2018 (22 percent and \$70 million), remaining among the highest across the five-year period. It is also noteworthy that, for the third consecutive year, the percentage and dollar amounts of contract obligations with minority women-owned business (14 percent and \$46 million) exceeded that with non-minority women-owned businesses (9 percent and \$30 million).

**Figure 2**

FY 2019 Treasury Departmental Offices  
Overall Contract Obligations by Gender Categories\*



**Table 3**

Treasury Departmental Offices  
Overall Contract Obligations by Gender-specific Business\*, FY 2015-2019

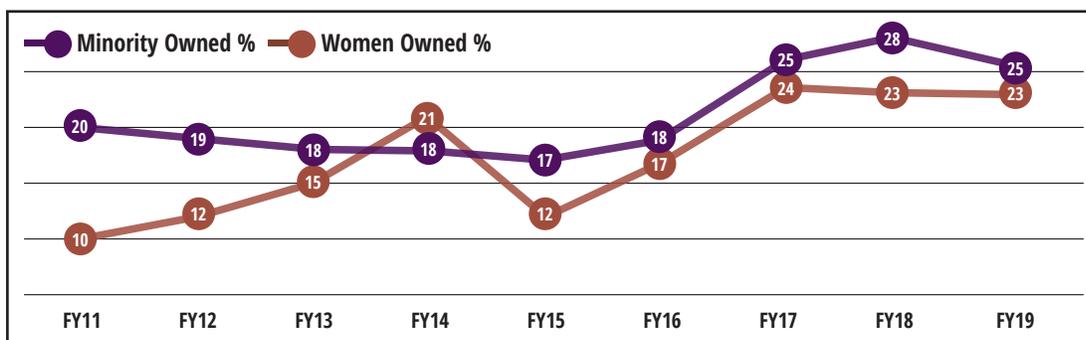
Category	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015
Women-owned Businesses	\$76 million (23%)	\$70 million (22%)	\$76 million (25%)	\$57 million (17%)	\$31 million (12%)
Minority Women	\$46 million (14%)	\$42 million (13%)	\$42 million (14%)	\$15 million (4%)	\$13 million (5%)
Non-minority Women	\$30 million (9%)	\$29 million (9%)	\$34 million (11%)	\$42 million (13%)	\$18 million (7%)
Non-women-owned Businesses	\$253 million (77%)	\$243 million (78%)	\$226 million (75%)	\$276 million (83%)	\$220 million (88%)

\* Contracting dollar amounts are based on Federal Procurement Data System (FPDS-ng) data extracted March 16, 2020 for FY19; Dollars and percentages are rounded.

Since OMWI first began tracking MWOB contracting in 2011, there has been an upward trajectory in MWOB utilization with a notable increase in the past two years. In FY 2018, the percentage and dollar amounts of minority-owned business contract obligations by Treasury Departmental Offices was the highest ever and among the highest in contract obligations with women-owned businesses (Figure 3).

**Figure 3**

Treasury Departmental Offices MWOB Contracting Trends Overall Percentages of Contract Obligations by Year, FY 2011-2019.



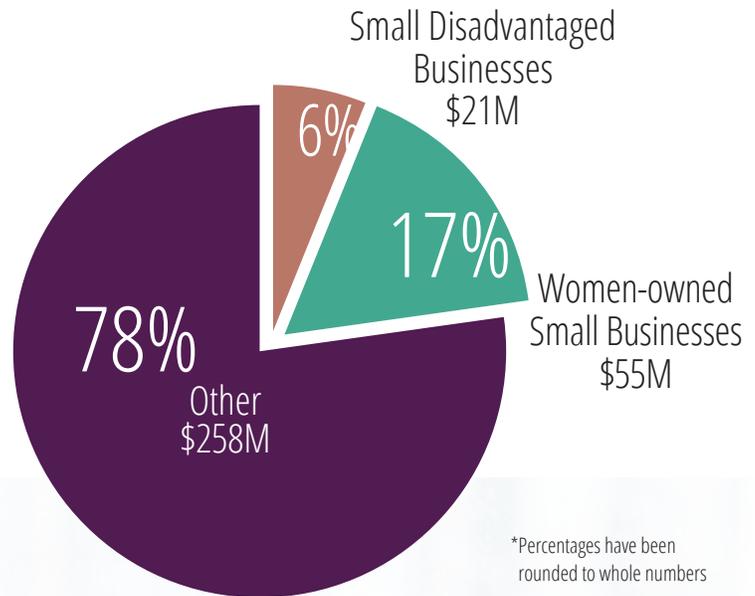
## TRENDS IN MWOB SMALL BUSINESS UTILIZATION

The vast majority of minority-owned businesses and women-owned businesses (MWOB) in the United States are small businesses with 98 percent of all MWOBs earning revenue under \$1 million, according to the most recently available census data. Consistent with the Dodd-Frank Act § 342 mandate to focus on minority-owned and women-owned businesses, there are statutory goals set by the Small Business Administration (SBA) for small disadvantaged businesses (which are largely minority-owned) and women-owned small businesses.

In FY 2019, contract obligations to small businesses by Treasury Departmental Offices comprised 50 percent of the value of contracts awarded, exceeding the 38.5 percent statutory goal. Contract obligations to small disadvantaged businesses represented 6.3 percent, exceeding the 5 percent statutory goal; similarly, contract obligations to women-owned small businesses represented 16.7 percent, more than triple the 5 percent statutory goal. (Table 4 and Figure 4)

Contract obligations to small minority-owned and women-owned businesses (MWOB) for the five most recent consecutive years are listed in Table 4.

**Figure 4**  
FY 2019 Treasury Departmental Offices  
Small MWOB Contract Obligations \* 8



**Table 4**

Treasury Departmental Offices  
Overall Contract Obligations to Small MWOB\*, FY 2015-2019

Category	FY 2018	FY2017	FY 2016	FY 2015	FY 2014
Total Contract Obligations (regardless of size)	\$329 million	\$313 million	\$301 million	\$333 million	\$250 million
Overall Small Businesses Contract Obligations	\$163 million (49%)	\$154 million (49%)	\$135 million (45%)	\$134 million (40%)	\$135 million (54%)
Small Disadvantaged Businesses (SDB)**	\$21 million (6%)***	\$69 million (22%)	\$36 million (12%)	\$42 million (13%)	\$32 million (13%)
Women-owned Small Businesses	\$55 million (17%)	\$47 million (15%)	\$70 million (23%)	\$51 million (15%)	\$25 million (10%)

\*Contracting dollar amounts are based on Federal Procurement Data System (FPDS-ng) data extracted March 16, 2020 for FY19; Dollars and percentages are rounded.

\*\*SDB is used in this context as a proxy for minority-owned businesses; contracting includes overlap between categories.

\*\*\*Small Disadvantaged Businesses (SDB) includes both Self-Certified Small Disadvantaged Businesses and -Small Business Administration (SBA) Certified Small Disadvantaged Businesses.

8. The combined total of awards to either women-owned small businesses or small disadvantaged businesses was \$73,508,805. This includes awards totaling \$2,447,858 to individual businesses that have overlapping classifications as both women-owned small business and disadvantaged small business. However, when calculating total contract obligation dollars and percentages for "Other" businesses, the overall contract obligations total (\$329,258,644) was reduced by \$71,060,947 (rather than \$73,508,805) to eliminate duplicate counting of businesses with overlapping classifications. To accurately portray the real value of awards to women-owned small businesses and small disadvantaged businesses, Figure 4 includes the \$2,447,858 overlap between classifications in both the "Woman-owned Small Businesses" and "Small Disadvantaged Businesses" contract obligation classifications. For this reason, the total dollar amount does not equal \$329 million and the total percentage does not equal 100% in Figure 4.

## MWOB PARTICIPATION IN SPECIFIC ACQUISITION CATEGORIES

In FY 2019, 95 percent of all Treasury Departmental Offices contracts tendered were for services (i.e., not including products), representing \$311 million in spending. 34 percent of Departmental Offices service contract obligated award dollars were awarded to minority-owned or women-owned businesses: 23 percent of service contract obligated award dollars went to women-owned businesses and 25 percent of service contract obligated award dollars went to minority-owned businesses.

The North American Industry Classification System (NAICS) is used by the United States, Canada, and Mexico to classify businesses by industry. Each business is classified into a six-digit NAICS code number based on the majority of activity at the business. Within Treasury Departmental Offices, approximately 77 percent of contract award dollars are made in seven NAICS code categories and minority or women-owned business utilization is highest among five of those categories. The highest utilization of minority- or women-owned businesses is in “Custom Computing Programming Service” (NAICS 541511), for \$28 million (91% of the category obligations) (Table 5).



**Table 5**

FY 2019 Treasury Departmental Offices (DO) Awards by Demographic Groups  
in Dollars and Percentage of Dollar Awards in the DO Top Seven NAICS Codes\*

Total Departmental Office Annual Obligated Dollars \$329,258,644 and processed 1,754 actions	NAICS Codes and Descriptions					
	541519		517110		541512	
	Other Computer Related Services		Wired Telecommunications Carriers		Computer Systems Design Services	
<b>Unique Vendor Count</b>	<b>62</b>		<b>1</b>		<b>22</b>	
<b>Award Category</b>	<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>
<b>Total DO Awards in NAICS</b>	<b>87,438,808</b>	<b>26.6</b>	<b>63,187,441</b>	<b>18.5</b>	<b>32,973,108</b>	<b>10.0</b>
<b>Minority-owned or Women-owned<sup>9</sup></b>	<b>21,025,023</b>	<b>24.0</b>	<b>0</b>	<b>0</b>	<b>21,635,596</b>	<b>65.6</b>
• Women-owned	17,389,304	19.9	0	0	6,294,664	19.1
• Minority-owned	4,797,830	5.5	0	0	21,490,596	65.2
Asian American	3,955,609	4.5	0	0	17,744,536	53.8
Black American	138,603	0.2	0	0	2,063,603	6.3
Hispanic American	9,801	0.0	0	0	3,884,917	11.8
Native American	-547,702	-0.6	0	0	0	0.0
Other Minority	189,716	0.2	0	0	0	0.0
<b>Neither Minority-owned nor Women-owned</b>	<b>66,413,784</b>	<b>76.0</b>	<b>63,187,441</b>	<b>100</b>	<b>11,337,512</b>	<b>34.4</b>

\*Contracting dollar amounts are based on Federal Procurement Data System (FPDS-ng) data extracted March 16, 2020 for FY19.

\*\*Percentages are greater than 100% or less than 0% due to funding that is deobligated from contracts.

9. Awards to businesses that are both minority- and women-owned are counted within the Federal Procurement Data System (FPDS-ng) in all applicable individual minority- and women-owned individual categories. To ensure there was no duplicate counting of overlapping categories of race/ethnicity and gender, the total dollars and percentages have been reduced.

NAICS Codes and Descriptions							
541511		541611		928120		493110	
Custom Computer Programming Services		Administrative Management and General Management Consulting Services		International Affairs		General Warehousing and Storage	
13		33		202		1	
\$	%	\$	%	\$	%	\$	%
<b>30,411,746</b>	<b>9.24</b>	<b>14,681,567</b>	<b>4.4</b>	<b>14,450,029</b>	<b>4.2</b>	<b>11,020,362</b>	<b>3.2</b>
<b>27,625,386</b>	<b>90.8</b>	<b>6,458,848</b>	<b>44.0</b>	<b>2,393,572</b>	<b>16.6</b>	<b>0</b>	<b>0.0</b>
26,521,585	87.2	457,110	3.1	2,047,252	14.2	0	0.0
19,219,925	63.2	6,081,693	41.4	568,836	3.9	0	0.0
19,156,026	63.0	5,046,656	34.4	-65,243	-0.5	0	0.0
0	0.0	409,646	2.8	-4,051	0.0	0	0.0
63,899	0.2	789,924	5.4	611,571	4.2	0	0.0
0	0.0	0	0.0	26,560	0.2	0	0.0
0	0.0	0	0.0	0	0.0	0	0.0
<b>2,786,360</b>	<b>9.2</b>	<b>8,222,719</b>	<b>56.0</b>	<b>12,056,457</b>	<b>83.4</b>	<b>11,020,362</b>	<b>100.0</b>

## GOOD FAITH EFFORT MANDATE

The contracts provision in the Dodd-Frank Act § 342 requires OMWI agencies to establish a procedure to evaluate whether an agency contractor has failed to make a good faith effort to include minorities and women in their workforce. In accordance with the mandate regarding the diversity of the contractor's workforce, the Treasury Departmental Offices OMWI, in collaboration with other OMWI agencies, developed language for inclusion in Departmental Offices service contracts in excess of \$150,000. The final rule was published in the Federal Register on March 20, 2014<sup>10</sup> and, subsequently, this clause has been included in applicable contracts.

The Department of Labor (DOL) Office of Federal Contract Compliance Programs (OFCCP) conducts diversity-related reviews on a subset of contractors across the federal government, including good faith effort assessments of contractor workforce diversity. Treasury determined that reliance on OFCCP's good faith effort assessments and findings would reduce overlapping reviews and leverage OFCCP's expertise. Utilizing OFCCP evaluation and investigation data, OMWI has developed and implemented a procedure to determine whether applicable Departmental Offices contractors have failed to make a good faith effort to include minorities and women in their workforce.

From OFCCP's assessments, OMWI uses OFCCP's binary (yes/no) findings of the five categories used to establish "good faith effort": 1) hiring, 2) recruitment, 3) systemic discrimination, 4) salary, and 5) other. A vendor would fail to demonstrate a good faith effort to achieve workforce diversity if there is a violation found in one or more of these categories:

- Hiring – failure to actively monitor the demographic data of new hires and make an unbiased hiring decision
- Recruitment – failure to conduct appropriate outreach and recruitment activities that avoid excluding any specific group
- Systemic Discrimination – systematic discrimination against any group
- Salary – indication that any a group has been unfairly compensated
- Other – a violation that does not fall into one of the categories listed above.

If no violations are found in any of the areas assessed by OFCCP, including the good faith effort categories, the contractor will receive a Notice of Compliance to denote compliance with all regulations. If the evaluated vendor is found to have one or more violations, OFCCP may enter into an agreement with the contractor to remedy the violation within a set period of time, typically 6 months. Otherwise, OFCCP may issue a Consent Decree with the vendor by reaching a settlement with no admission of guilt. Alternatively, OFCCP may enter a financial arrangement with the vendor to rectify identified violations. In the case that a Treasury Departmental Offices contractor evaluated by OFCCP does not receive a Notice of Compliance, OMWI will accept as final the specific remedy conferred by OFCCP.

In addition to its regular review of federal contractors based on random sampling, OFCCP will conduct individual investigations in response to a specific allegation of discrimination by a federal contractor that is reported to OFCCP. A vendor would be found in violation if there was indication of discrimination based on color, national origin (Hispanic), race (American Indian/Alaskan, Asian/Pacific, Black), religion, sex (female, male), veteran, disability, or "other." In the case that a Treasury Departmental Offices contractor is investigated by OFCCP, OMWI will accept as final the specific remedy conferred by OFCCP.

Treasury Departmental Offices had 238 contracts in FY 2019 that met the requirements for a good faith effort review. Of those contracts, there were 149 unique Treasury Departmental Offices contractors. Thirteen percent (20) of these contractors had undergone either OFCCP comprehensive compliance evaluations or OFCCP investigations for discrimination in response to a specific allegation within the past 5 years.

The comprehensive OFCCP compliance evaluation included 12 percent (18) of the 149 contractors. These 18 contractors represented 43 percent of the FY 2019 contract dollars obligated by Treasury Departmental Offices for vendors with contracts that met the threshold for good faith effort reviews (\$132 million out of \$307 million in vendors with GFE-eligible contracts). OFCCP evaluations for violations in the five categories showed that 83 percent (15 contractors) received a Notice of Compliance. Of the three

11. Refer to <http://www.gpo.gov/fdsys/pkg/FR-2014-03-20/html/2014-05846.html>.

contractors that did not receive a Notice of Compliance, one was cited for a Recruitment violation (\$4 million in contracts) and two were cited for an Other violation (\$2 million in contracts). OFCCP ultimately conferred conciliation agreements as the remedy for these violations.

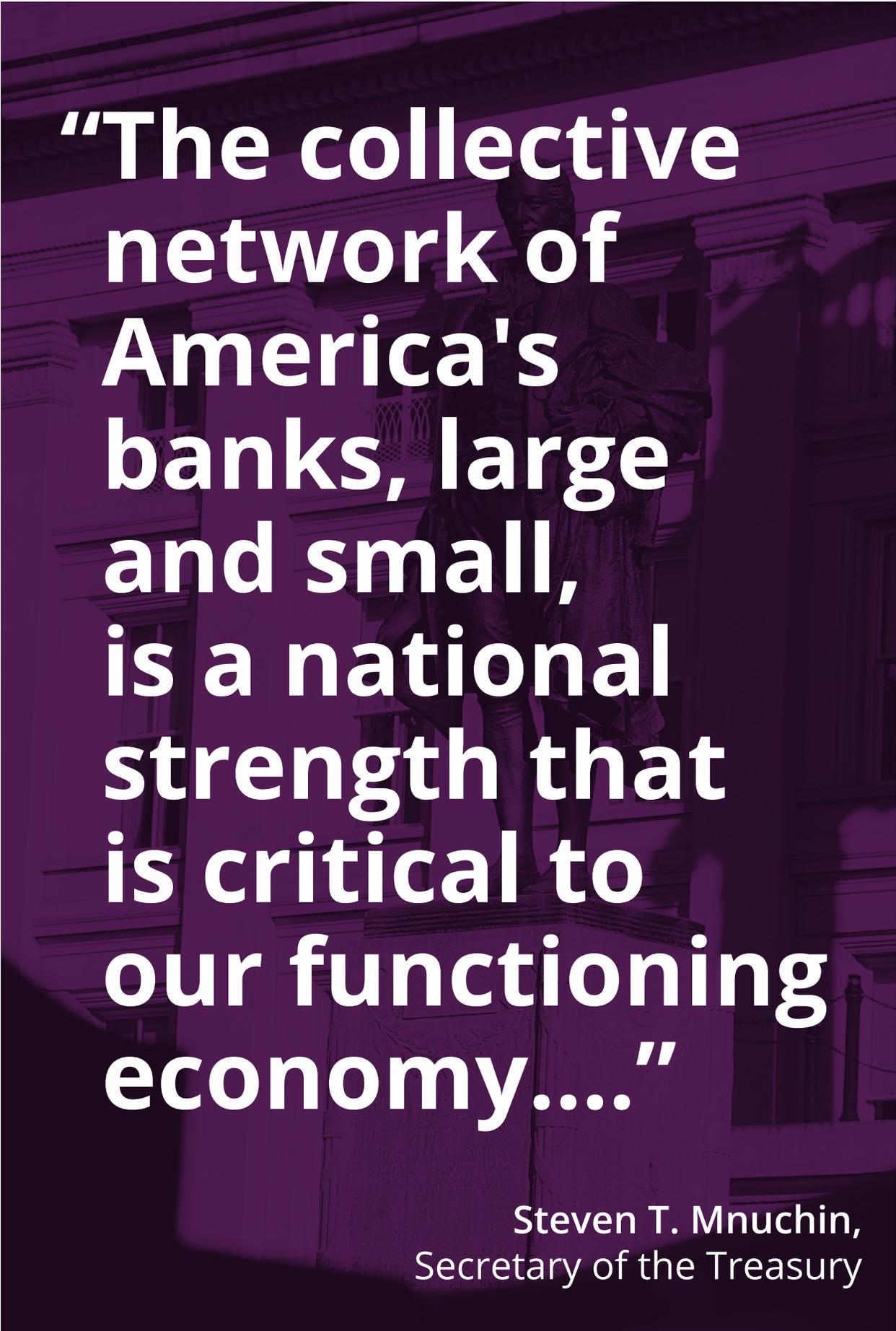
OFCCP conducted investigations for eight reported allegations of discrimination, five percent of the 149 contractors (\$73 million in total contracts). The reported allegations against the eight contractors included discrimination against one or more of the following: Hispanic, Black, religiously-affiliated, female, male, veteran, disabled employees, or a reported allegation cited as “other discrimination.” The outcomes of these investigations resulted in no violations being confirmed.

## FINANCIAL AGENT AUTHORITY

In addition to the procurement of goods and services through processes governed by the Federal Acquisition Regulation (FAR), Treasury also has financial agent authority (FAA). Unique to the Treasury and granted by the National Bank Acts of 1863 and 1864, the FAA allows Treasury to designate financial institutions to provide certain services on the government’s behalf. These firms act on behalf of the government during the performance of their duties under an agent-principal relationship with Treasury. Financial agents also have the fiduciary obligation to protect the interests of the United States.

or advertising activities targeting women, veteran, or minority communities. In total, 83 percent of SBLF participants reported that they are members of, or participate in, community organizations and/or trade associations that target women, veteran, or minority communities; 59 percent reported using paid advertisement or notices in print, radio, or electronic media to target women, veteran, or minority communities; and, 52 percent indicated that they distributed marketing materials targeting women, veteran, or minority communities. In total, participants reported expenditures of \$15.4 million associated with small business-related outreach activities and allocated approximately \$5.0 million (32 percent) to activities targeting women, veteran, or minority communities.





**“The collective network of America's banks, large and small, is a national strength that is critical to our functioning economy....”**

**Steven T. Mnuchin,  
Secretary of the Treasury**

# INITIATIVES & ACCOMPLISHMENTS

## CAPACITY BUILDING

**Treasury's Bank Mentor-Protégé Program.** In FY 2018, OMWI and the Bureau of Fiscal Services Office of Collections collaborated to launch a new program to facilitate the inclusion of a broader segment of the financial institution community to serve as Treasury financial agents. Several large banks perform revenue collections and deposits activities as financial agents on behalf of Treasury. This program has sought that these large financial agent banks establish mentor-protégé agreements with small financial institutions (with assets under \$2 billion) in order to provide technical assistance to the participating protégé institutions to build their capacity to serve as conduits for financial agent work. This first-of-its-kind program was officially launched in August 2018 when the first financial agent mentor-protégé agreement was signed.

Beyond the potential service to Treasury as Financial Agents, small community banks, including minority-owned banks are critical to our financial network and essential to our functioning economy. For generations, small community banks, including minority-owned banks, have been crucial to the economic vitality of low- to moderate-income communities. Such banks align their services based on their longstanding relationships with their customers and specialized knowledge of their community. For local communities, access to credit, loans, deposit services, financial expertise, and even bank jobs are essential to daily life and economic stability.

Minority-own banks were disproportionately impacted by the 2008 financial crisis. Leading up to 2008, the number of minority depository institutions increased from 164 to 215 before declining to 149 by year-end 2018. Since 2008, the number of Black-owned banks decreased by more than half, leaving the total number of Black-owned banks to just 22 (of the 148 total minority owned banks)<sup>11</sup>. Although the number of Native-American, Hispanic-American, and Asian-American owned banks increased during the same period, minority banks overall were about 2½ times more likely to fail than all other banks.<sup>12</sup>

In order to ensure these institutions remain viable, Treasury Secretary Mnuchin requested an expansion of the mentor-protégé program beyond the original focus of only financial agent work involving existing Treasury financial agent banks. The expanded programmatic aim is for approximately 20 percent of all minority-owned banks (30 banks) to become protégés and 20 of the nation's largest banks to become mentors with 1 to 2 protégés each. In September 2019, Secretary Mnuchin wrote letters to the CEOs of the 26 largest commercial banks to ask their consideration in participating in the program.

By the end of FY 2019, there were 8 banks participating in the program and among them five established mentor-protégé relationships. Three are three large mentor banks and five are small protégé banks. Treasury continues to engage with institutions in order to expand the reach of the program.

Congress has also recognized the importance of the Bank Mentor-Protégé Program as a mechanism for broadening the capacity of small and community banks, and in particular minority banks, including the benefit of having committed mentor institutions providing technical and service capability. OMWI and Treasury will continue to work with Congress on advancing the important goals of increasing opportunities for these institutions, to expand networks within the financial-services industry, and to facilitate the inclusion of a broader range of financial institutions in Treasury business opportunities. As Secretary Mnuchin has stated, the collective network of America's banks, large and small, is a national strength that is critical to our functioning economy.

**Industry Outreach.** For a second consecutive year, Secretary Mnuchin hosted an event that brought together African American business leaders designed as an opportunity for informal conversations and networking among the group and with the Secretary. Participants included national and international corporations in various industries, minority-owned community banks, professional associations in the financial industry, community organizations and foundations, and economics departments in historically Black colleges and universities.

11. Federal Depository Institutions (3rd Quarter 2019) Minority Depository Institutions List <https://www.fdic.gov/regulations/resources/minority/mdi.html>

12. Federal Deposit Insurance Corporation (2019) *2019 Minority Depository Institutions: Structure, Performance, and Social Impact*.

Treasury effectively engaged with small minority-owned and women-owned businesses through substantial outreach efforts. Treasury employs multiple strategies and communication channels to reach candidate vendors, including:

- Posting requests for proposals on the Federal Business Opportunities website at [www.fbo.gov](http://www.fbo.gov)
- Conducting multiple vendor outreach sessions throughout the year
- Providing resources on the Treasury Office of Small and Disadvantaged Business Utilization website at [www.treasury.gov/osdbu](http://www.treasury.gov/osdbu) and on the OMWI homepage of [www.treasury.gov](http://www.treasury.gov)
- Extending the use of techniques proven effective in engaging the small business community to the broader industry audience, including minority-owned and women-owned firms
- Reviewing vendor engagement strategy as part of acquisition planning for high-impact acquisitions
- Conducting strategic reviews of targeted acquisitions to ensure that acquisition planning includes adequate and appropriate industry outreach and communications consistent with law, regulation, and Treasury policy.

When OMWI was first established in 2011, Treasury's small business efforts were conducted within the OMWI organizational structure. After legislative changes pertaining to the reporting structure of Offices of Small Disadvantaged Business Utilization (OSDBU) across government, Treasury's small business program became a separate OSDBU in FY 2015, but has remained closely aligned with OMWI. Throughout FY 2019, the Treasury OSDBU hosted four vendor outreach sessions, which included specialized sessions exclusively for 1) subcontracting and mentor-protégé opportunities with Treasury prime contractors, 2) women-owned small businesses, 3) historically underutilized business zones (HUBZone) and service-disabled veteran-owned businesses, and 4) vendors interested in information technology opportunities. Participation in these sessions increased by nearly one-third in FY 2019 compared to FY 2018. Approximately 3,429 vendors registered to participate in these sessions (2,315 in 2018), including 1,684 representing minority-owned businesses (729 in FY 2018) and 1,003 representing women-owned businesses (868 in 2018). Participating vendors received individual counseling from Treasury procurement specialists from the individual bureaus to learn about upcoming opportunities and doing business with Treasury.

In December 2018, the Treasury OSDBU and General Service Administration took the lead in hosting the ChallengeHER program, a national training initiative designed to train women-owned small business owners on the best practices for working as federal contractors, and the unique federal programs available to them. In response to Executive Order 13157, "*Increasing Opportunities for Women-owned Small Businesses*," this event was conducted in partnership with the U.S. Small Business Administration (SBA), Women Impacting Public Policy (WIPP), and American Express OPEN. Treasury provided free workshops, mentoring, and direct access to Treasury and 26 other Federal agency partners, educating over 700 women-owned small businesses. Workshops included: *The Future of Women-owned Small Business (WOSB) in Federal Contracting; Working with Agencies and Primes; and Leveraging Your WOSB Certification*. There was also a business matchmaking session with over 253 small businesses that met with Treasury, federal agency partners, Treasury prime contractors, and national and local resource partners.

In May 2019, the Treasury OSDBU supported the Montgomery County Chamber of Commerce GovConNet Conference. This signature event hosts over 1,000 regional and federal business and government leaders. It provided small businesses with an interactive overview of "How to Do Business with Treasury." It served as a capacity building program, primarily focused on educating small businesses on the category management and best-in-class contracting vehicles, acquisition life cycle and business matchmaking. Content of some of the breakout sessions included: success strategies for 8(a) graduating firms, new rules pertaining to mentors and protégés, limitations on subcontracting, creating strong capabilities statements, and set-asides for GSA schedules contracting.

Treasury also participated in several small business outreach events sponsored by SBA, other federal agencies, local government, members of Congress, and external organizations that represent SMWOB, serving as panelists, speakers, facilitators, planning committee members, and exhibitors. Those events are listed below:

- National Women’s Business Council (NWBC) – Washington, DC
- 2019 National HBCU Week Conference – Washington, DC
- Mid-Tier Advocacy Association – Huntsville, AL
- Women’s Chamber of Commerce & Catalyst Group – Huntsville, AL
- Elite SDVOSB Conference – New York, NY
- Women’s Power Conference – Bethesda, MD
- U.S. Department of Transportation Small Business
- Information Technology Industry Day – Washington, DC
- U.S. Department of State Annual Large Prime Subcontracting
- Training/Small Business Networking Session – Fairfax, VA
- Women’s Business Enterprise National Council Conference (WBENC) – Baltimore, MD
- Women Impacting Public Policy Leadership Summit – Washington, DC
- 2019 HUBZone Small Business Summit – Atlanta, GA
- SAIC – Reston, VA
- Pathway for Growth Procurement Conference – Rockville, MD
- OMWI: Leading the Way to Cultural Transformation Symposium – Washington, DC
- (Supplier Diversity Sessions) – Washington, DC
- Prime Contractors Vendor Outreach Session – Washington, DC
- Maryland PTAC HUBZone Connections – College Park, MD
- Government Procurement Conference – Washington, DC
- NIH HBCU Industry Day – Bethesda, MD
- Small Business Vendor Outreach Session – Washington, DC
- Procuring Opportunity Meet & Greet at Morgan State University (HBCU) – Baltimore, MD
- ChallengeHer General Services Administration – Washington, DC
- U.S. Women’s Chamber of Commerce Conference – Arlington, VA
- VETS 2 Training – New Carrollton, MD
- All Small Businesses Vendor Outreach Session – Washington, DC
- National Minority Supplier Development Council – Austin, TX
- National HUBZone Council – Chantilly, VA
- The Institute for Federal Leadership in Diversity & Inclusion – Bethesda, MD

**Historically Black Colleges and Universities Contracting.** Treasury, led by the Office of Small and Disadvantaged Business Utilization (OSDBU), participates on the White House Initiative for Historically Black Colleges and Universities Working Group to address matters related implementing *Executive Order 13779, “White House Initiative to Promote Excellence and Innovation at Historically Black Colleges and Universities.”* As part of this network activity, OSDBU delivered a presentation entitled, “The Unveiling of Transformational Federal Government Procurement Initiative” that presented the concept of establishing a contracting vehicle that would be inclusive of Historically Black Colleges and Universities (HBCU) contracting.

The U.S. General Services Administration (GSA) Schedule Contract is one of the most widely used government contract vehicles because it streamlines the government procurement process and can be used by any federal agency. The federal government spends over \$30 billion annually through GSA Schedule contracts. In FY 2019, the Treasury, via OSDBU, collaborated with the GSA in support of including HBCUs on GSA IT-70, a “Best in Class” contracting vehicle for information technology services. Through this collaboration, Treasury was instrumental in getting three HBCUs (Alabama A&M University, Oakwood University and Fayetteville University) included under this contract vehicle for the first time and eligible for consideration for IT contracts. Because this contract vehicle can be leveraged government-wide, many different agencies across the federal government can now consider contracting with these HBCUs and, at the same time, address their “Best in Class” contracting goals.

## ECONOMIC EMPOWERMENT

In addition to supporting the minority-owned and women-owned businesses through federal contracting, Treasury takes a leadership role in supporting economic development in underserved communities through funding programs designed to support community investment and access to capital for small businesses.

**Community Development Financial Institutions Fund.** Access to affordable financial products and services is a staple of economically sound communities. Yet, one quarter of American households are unbanked (6.5 percent) or underbanked (18.7 percent) and rely on more costly financial products and services outside of the banking system.<sup>13</sup> In recent years, the lack of access to capital investment for small businesses and other community development projects has led to increased need for alternative and reliable sources of financing. Mission-driven organizations called Community Development Financial Institutions (CDFIs) fill these gaps by offering affordable financial products and services that meet the unique needs of economically underserved communities. Through awards and training, Treasury’s Community Development Financial Institutions Program (CDFI Program) invests in and builds the capacity of CDFIs, empowering them to grow, achieve organizational sustainability, and contribute to the revitalization of their communities.

Since its creation in 1994, the CDFI Fund has awarded more than \$2.4 billion in Financial Assistance and Technical Assistance awards through the CDFI Program, including the Healthy Food Financing Initiative-Financial Assistance and Disability Funds-Financial Assistance awards. In FY 2019, 321 organizations received more than \$182 million in awards, consisting of 261 Financial Assistance and 60 Technical Assistance awards. Recipients of the awards included 200 loan funds, 73 credit unions, 43 depository institutions/holding companies, and 5 venture capital funds.

The Consolidated Appropriations Act for Fiscal Year 2019 required that 10 percent of the funds awarded by the CDFI Fund under the appropriation “shall be used for awards that support investments that serve populations living in Persistent Poverty Counties (PPCs). PPCs are defined as counties where 20 percent or more of the population has lived in poverty over the past 30 years. These counties can be found in the United States in both rural and urban areas. For the FY 2019 round, 125 organizations received \$18.2 million in awards specifically for investments in PPCs, which is in addition to the work that CDFIs already do in PPCs. Historically, past CDFI Program awardees made 17 percent of their loans and investments in PPCs.

3. <https://www.fdic.gov/householdsurvey/2017/2017report.pdf>

**Small Business Lending Fund.** Established by the Small Business Jobs Act of 2010 (the Act), the Small Business Lending Fund (SBLF) is a fund specifically dedicated to provide capital to qualified community banks and community development loan funds (CDLFs) in order to encourage small business lending. The purpose of the SBLF is to encourage community-based banks and small businesses to work together, help create jobs, and promote economic growth in communities across the nation. The Act defines “small business lending” as business loans that are (i) \$10 million or less to businesses with \$50 million or less in revenue, and (ii) included in one of the following categories:

- Commercial and industrial loans
- Owner-occupied nonfarm, nonresidential real estate loans
- Loans to finance agricultural production and other loans to farmers
- Loans secured by farmland

Treasury invested over \$4.0 billion in 332 institutions through the SBLF program. These amounts include investments of \$3.9 billion in 281 community banks and \$104 million in 51 development loan funds. Collectively, these institutions operate in over 3,000 locations across 47 states and the District of Columbia. Through the end of June 2019 (the third quarter of FY 2019), institutions participating in SBLF have made important progress in increasing their small business lending, helping to support small businesses and local economies across the nation. Since the program's inception, the total increase in small business lending reported by current and former SBLF participants is \$19.0 billion over the 2010 baseline of approximately \$35 billion.

Increases in small business lending are widespread among remaining SBLF participants. Through June 2019, all currently participating community banks and 30 of the 34 CDLFs (or 88 percent) have increased their small business lending. In addition, 34 of the 41 current SBLF participants (or 83 percent) have increased their small business lending by 10 percent or more.

Treasury does not collect racial/ethnic or gender information on the SBLF participant's borrowers. However, in a survey of SBLF participants for the year ended June 30, 2014 (the most recent available), 92 percent of participants reported engaging in outreach or advertising activities targeting women, veteran, or minority communities. In total, 83 percent of SBLF participants reported that they are members of, or participate in, community organizations and/or trade associations that target women, veteran, or minority communities; 59 percent reported using paid advertisement or notices in print, radio, or electronic media to target women, veteran, or minority communities; and, 52 percent indicated that they distributed marketing materials targeting women, veteran, or minority communities. In total, participants reported expenditures of \$15.4 million associated with small business-related outreach activities and allocated approximately \$5.0 million (32 percent) to activities targeting women, veteran, or minority communities.

## ACCOUNTABILITY

**Leadership Monitoring.** OMWI develops detailed weekly reports of MWOB contracting for the senior leadership and staff. Each bureau's small business and MWOB contracting performance also is reported to the senior leadership in performance review sessions with Bureau Heads. The Senior Procurement Executive uses monthly Treasury Acquisition Council meetings with Bureau Chief Procurement Officers to review and discuss the status of Treasury's overall small business contracting performance against its goals, and examine the MWOB contracting rate.

**Performance Elements.** The performance criteria for the Chief Procurement Officers in each Treasury bureau include elements pertaining to the achievement of small business contracting goals and the fair utilization of minority and women-owned businesses, without regard to size. At minimum, Chief Procurement Officers are required to demonstrate the following:

**Small Business Goals.** Actively promote and support early market research and acquisition planning activities to foster business strategies that maximize small business contracting opportunities and small business set asides with overall small business, small disadvantaged business, service disabled veteran owned small business, women-owned small business and HUBZone Small business—when the research and planning indicate that the small business community is capable of performing the work at a reasonable cost or price.

**Minority-owned and Women-owned Business (MWOB) Utilization.** Actively support efforts to ensure fair inclusion and utilization of minority-owned and women-owned businesses, without regard to size, in contracting opportunities to the maximum extent possible. Develop and implement strategies for diversification of the vendor base, including early acquisition planning, regular procurement forecasting, strategic market research, and outreach.

**Recognition.** OMWI, in collaboration with the Office of Small Disadvantaged Business Utilization, holds an annual awards recognition program for outstanding performance in Small, Minority-owned, and Women-owned Businesses (SMWOB) contracting, which provides an additional achievement incentive to the acquisition community. Awards include recognition to bureaus that achieve the highest percentages of contract obligations with minority-owned and women-owned businesses. For FY 2019, the two leading bureaus with total procurement spending of \$100 million or more expended 30 percent of their contracting dollars with minority-owned businesses in the amount of \$41 million (Office of the Comptroller of the Currency) and 35 percent with women-owned businesses in the amount of \$71 million (Bureau of Fiscal Services). Two other bureaus with total procurement spending under \$100 million expended 54 percent of their contracting dollars with minority-owned businesses in the amount of \$20 million (Alcohol and Tobacco Tax and Trade Bureau) and 59 percent with women-owned businesses in the amount of \$505 thousand (Office of the Inspector General for TARP).

Because of the limited nature of goods and services purchased by the U.S. Mint (Mint) and the Bureau of Engraving and Printing (BEP), which mint coins and print currency, the percentage of contract obligations expended with minority and women owned business is relatively small. However, it should be noted that the dollar amounts expended by the Mint and BEP are substantial. In FY 2019, MWOB contract obligations by the Mint and BEP totaled \$36 million and \$41 million, respectively.

## CHALLENGES

Since OMWI first began tracking MWOB contracting in 2011, there has been an upward trajectory in MWOB utilization within Treasury Departmental Offices. In FY 2019, the percentage and dollar amounts of minority-owned business contract obligations and women-owned business contract obligations were among the highest ever. During FY 2019, these results were achieved without mandated goals (other than for specific small business categories).

Category management strategies have been employed by the government-wide acquisition community to streamline and manage entire categories of spending across government as a single enterprise. The purpose of category management is to better leverage the government's buying power, reduce unnecessary contract duplication, increase efficiency, and deliver more value and savings. Safeguards have been put in place to promote small business utilization within the context of category management. For example, small business utilization is one of the five key performance indicators of the category management initiative, and each of the ten Common Spend Category strategic plans must include small business utilization. No safeguards are mandated with regard to the utilization of MWOB businesses (other than specific small business categories). As a result, there were concerns about the potential for more limited use of MWOB businesses resulting from the creation of new acquisition vehicles, such as "Best in Class" contract vehicles for mandatory sourcing to specified pools of businesses that contain only a small number of MWOB vendors. However, after the implementation of category management strategies, there has been no appreciable changes recorded in MWOB utilization since FY 2018, the first year of implementation. OMWI will continue monitoring for possible changes resulting from category management of MWOB utilization.

## FISCAL YEAR 2020 PLANS

The commitment to MWOB contracting within Treasury Departmental Offices has remained strong. In FY 2019, more than one-third (34 percent) of contract dollars totaling \$112 million went to either minority-owned or women-owned businesses. These percentage and dollar amounts were among the highest ever for minority-owned and women-owned business contract obligations by Treasury Departmental Offices.

Although there are no goals for MWOB contracting, the congressionally mandated small business goals can serve as useful benchmarks to gauge performance. The Treasury Departmental Offices MWOB contracting performance of 49 percent exceeds the

benchmarked goal for contracting with small businesses as mandated for Treasury in FY 2019. Similarly, contracting with minority-owned businesses was at 25 percent in FY 2019, which is well above the benchmarked 5 percent goal as mandated for contracting with small disadvantaged businesses (and are largely minority-owned). Further, contracting with women-owned businesses was 23 percent in FY 2019, which greatly exceeds the benchmarked 5 percent goal as mandated for contracting with small women-owned businesses. It is also important to note that MWOB contracting is not limited to less prominent business categories. There is strong MWOB representation among contracts in five of the Treasury Departmental Offices top seven industry codes.

OMWI will strive to support efforts that will not only maintain but continually improve this performance. Specific efforts that will be undertaken in FY 2020 include the following:

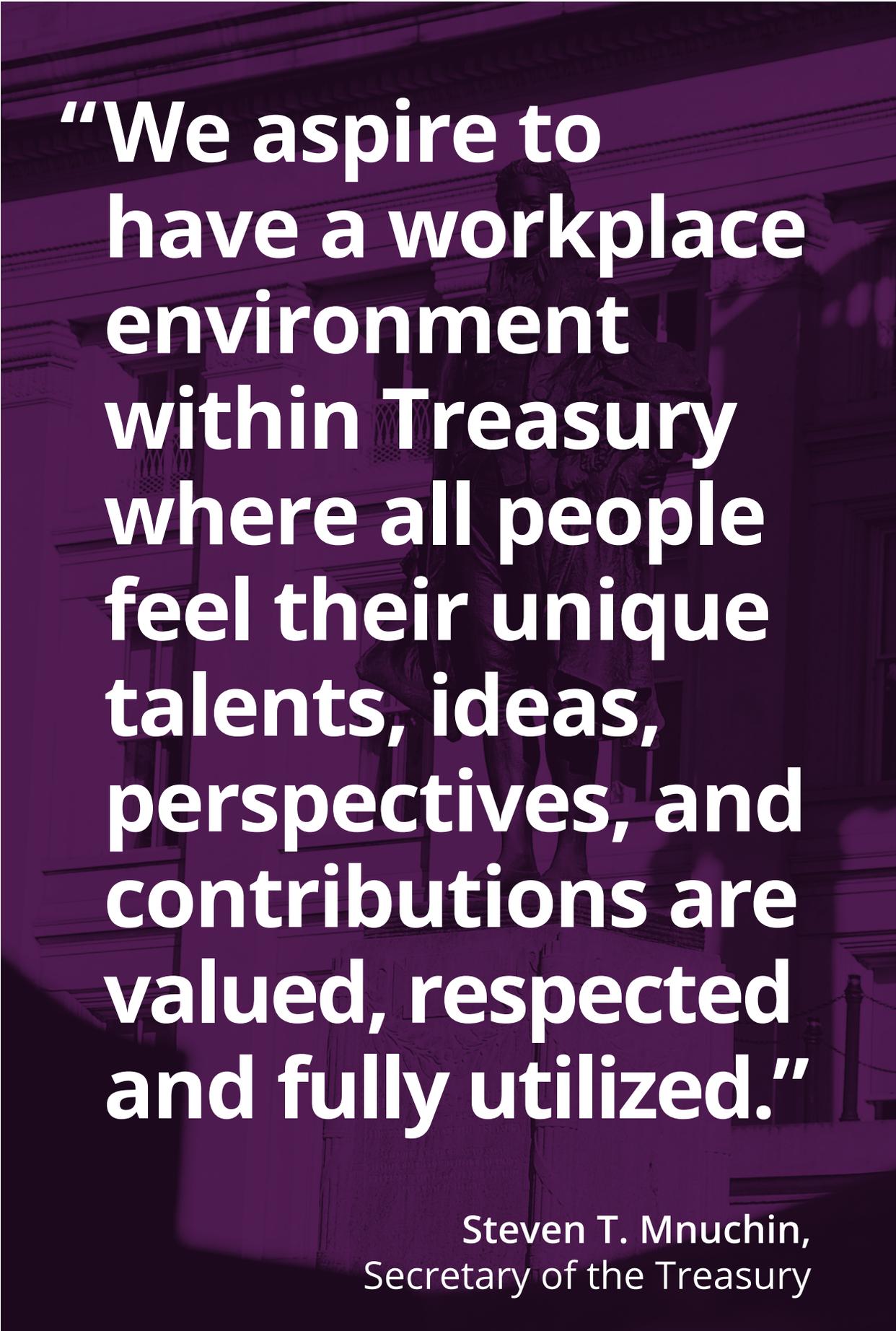
**Accountability.** OMWI will continue to monitor and develop regular reports on the utilization of minority and women-owned businesses by each of the Bureaus. Such reports will provide a record tracking progress for use by the acquisition community and leadership, including the quarterly performance reviews conducted by senior leadership. Additionally, OMWI will continue to explore the use of new metrics and benchmarks to increase understanding of possible barriers and aspirational standards for business diversity and inclusion.

**MWOB Utilization.** For nine consecutive years, utilization of minority- and women-owned businesses of all sizes by Treasury Departmental Offices has been well above government benchmark standards. In addition, Treasury Departmental Offices has met or exceeded aggressive goals in contracting with small disadvantaged businesses and women-owned small businesses. In FY 2020, Treasury will strive to maintain its strength in MWOB utilization and small business goal attainment by continuing to employ the strategies that have proven successful for Treasury since FY 2011. This has included targeted outreach, leadership oversight and accountability, new policies when necessary, regular monitoring and reporting, new tools and resources for the acquisition community, and regular intra-agency communication.

**Financial Agent Authority (Non-FAR).** Treasury will continue to build relationships and actively engage with stakeholder groups that represent minority-owned and women-owned financial institutions and minority and women professionals. This open dialogue and engagement will support diverse participation in future program opportunities that may arise under the Treasury financial agent authority. Treasury will continue to ensure that requests for proposals or other solicitation processes for financial agent opportunities are fair and will encourage meaningful participation of minority-owned and woman-owned businesses either as financial agents or contractors to financial agents.

In FY 2020, OMWI and the Bureau will continue its collaborative work to expand the Bank Mentor-Protégé Program between large and small banks. The long-term programmatic aim is for approximately 20 percent of all minority-owned banks (30 banks) to become protégés and 20 of the largest banks to become mentors with 1 to 2 protégés each.

**Outreach:** OMWI is committed to conducting robust and effective outreach to minority-owned and women-owned small businesses. In addition to public posting on the Federal Business Opportunities web-site, Treasury will continue to conduct regular vendor outreach sessions and presentations at conferences and events conducted by industry organizations and federal agencies.



**“We aspire to have a workplace environment within Treasury where all people feel their unique talents, ideas, perspectives, and contributions are valued, respected and fully utilized.”**

Steven T. Mnuchin,  
Secretary of the Treasury

# WORKFORCE DIVERSITY & INCLUSION

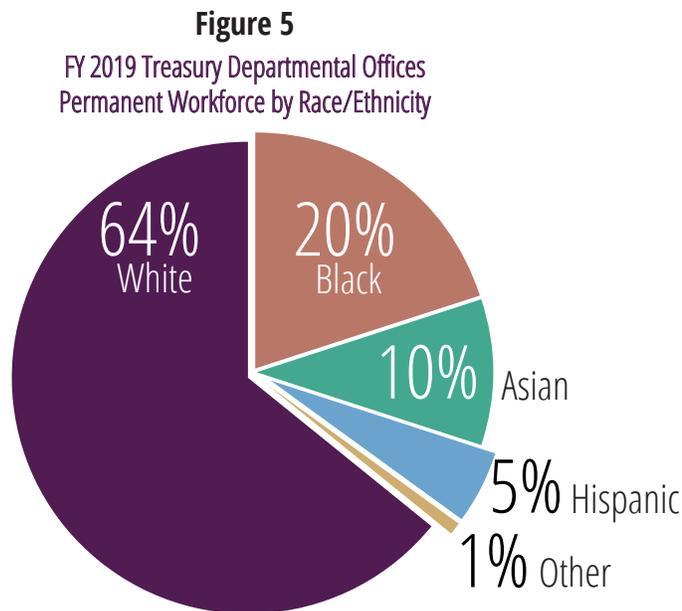
## WORKFORCE DEMOGRAPHY

All Treasury Departmental Offices employees play important roles in the fulfillment of the overall Treasury mission. All employees bring perspectives to their work that are influenced by their backgrounds, culture, and experiences. From analyses of the racial, ethnic, and gender diversity within Treasury Departmental Offices, OMWI has developed workforce profiles, trends, benchmark comparisons, hiring and attrition rates, pipeline profiles, and demographic differentiation at upper and senior levels and in mission-critical occupations in FY 2019.<sup>14</sup> However, just as importantly, OMWI has compiled survey results and benchmark comparisons of employee perceptions of the Treasury Departmental Offices workplace environment relative to inclusion. This comprehensive examination informs the recommendations for the work of OMWI going forward.

### RACE, ETHNIC AND GENDER PROFILES

The total Treasury-wide workforce across all bureaus and the Departmental Offices in FY 2019 was 90,319 permanent employees (compared to 91,179 in FY 2018). The Treasury Departmental Offices permanent workforce represents about 2 percent of the total Treasury-wide workforce. As of the close of FY 2019, Treasury Departmental Offices had 1,760 permanent employees, a decrease of 28 (-2 percent net change) from FY 2018 (1,788). Permanent employees comprised 95 percent and temporary employees (including non-career employees) comprised 5 percent of the total DO workforce.

More than a third (36 percent) of Treasury Departmental Offices permanent employees across all grade levels are racial or ethnic minorities. The percentage of minorities decreased by one percent from FY 2018 to FY 2019. Black representation changed in FY 2019 compared to the prior year. Blacks decreased from 22 percent in FY 2018 to 20 percent in FY 2019 (-2% net change). Asian representation increased from 9 percent in FY 2018 to 10 percent in FY 2019 and Hispanic representation remained constant at 5 percent. (Figure 5)



\*Percentages have been rounded to whole numbers

14. Analyses do not include the racial ethnic categories, Native Hawaiian or Other Pacific Islanders, American Indian or Alaskan Natives, or Two or More Races because the representation of each of these groups is zero to less than one percent of the total Departmental Offices permanent workforce.

## BENCHMARK COMPARISONS

To assess the relative status of the diversity profile of Treasury Departmental Offices, the Treasury Departmental Offices workforce was compared with the federal government-wide workforce (FWF), Treasury-wide workforce (TWF), Civilian Labor Force (CLF), and the Relevant Civilian Labor Force for Departmental Offices (DO/RCLF) by race/ethnicity and gender participation.<sup>14</sup> Table 6 depicts the comparison of the Treasury Departmental Offices total permanent workforce for FY 2018 with the demography of these benchmarks.

The percentages of employees by gender in Treasury Departmental Offices in FY 2019 remained unchanged compared to the FY 2018 representation of women and men. The representation of women and men were 44 percent and 56 percent, respectively. (Figure 6) To assess the relative status of the diversity profile of Treasury Departmental Offices, the Treasury Departmental Offices workforce was compared with the federal government-wide workforce (FWF), Treasury-wide workforce (TWF), Civilian Labor Force (CLF), and the Relevant Civilian Labor Force for Departmental Offices (DO/RCLF) by race/ethnicity and gender participation.<sup>15</sup> Table 6 depicts the comparison of the Treasury Departmental Offices total permanent workforce for FY 2019 with the demography of these benchmarks

**Figure 6**  
FY 2018 Treasury Departmental Offices  
Total Permanent Workforce by Gender



\*Percentages have been rounded to whole numbers

**Table 6**  
FY 2019 Treasury Departmental Officers (DO) Permanent  
Workforce Demography Compared to Federal  
Government, Treasury-Wide, Civilian Labor Force, and Relevant  
Civilian Labor Force Demography\*

Demographic Groups	Treasury DO**	Federal Government Workforce (FWF)***	Treasury-wide Workforce (TWF)	Civilian Labor Force (CLF)	Relevant Civilian Labor Force (DO/RCLF)
Men	56%	57%	38%	52%	55%
Women	44%	43%	62%	48%	45%
Hispanic Men	3%	5%	4%	5%	3%
Hispanic Women	2%	4%	8%	5%	3%
White Men	39%	39%	24%	38%	44%
White Women	24%	25%	29%	34%	33%
Black Men	8%	8%	7%	5%	4%
Black Women	13%	11%	20%	7%	5%
Asian Men	6%	4%	3%	2%	3%
Asian Women	4%	3%	4%	2%	3%

\* Percentages have been rounded to whole numbers.

\*\* Table 6 does not include the racial ethnic categories, Native Hawaiian or Other Pacific Islanders, American Indian or Alaskan Natives, or Two or More Races that combined total approximately one percent of the total Departmental Offices permanent workforce.

\*\*\* Federal Workforce data is derived from the OPM Federal Employment Reports, Executive Branch Employment by Gender and Race/National Origin, September 2006-September 2017 (<https://www.opm.gov/policy-data-oversight/data-analysis-documentation/federal-employment-reports/reports-publications/executive-branch-employment-by-gender-and-racenational-origin/>)

15. For the purpose of this analysis, Relevant Civilian Labor Force (RCLF) refers to the Civilian Labor Force (CLF) data that are directly comparable to the main occupations in Treasury Departmental Offices.

Across the four benchmarks (FWF, TWF, CLF, DO/RCLF), the Treasury Departmental Offices representation of women overall is lower with the exception of the FWF. But, the representation of White women is lower across all the four benchmarks. The representation of White men is equal to the FWF, greater than the TWF, slightly higher than the CLF, and below the DO/RCLF.

Across the four benchmarks (FWF, TWF, CLF, DO/RCLF), the Treasury Departmental Offices representation of women overall is lower with the exception of the FWF. But, the representation of White women is lower across all of the four benchmarks. The representation of White men is equal to the FWF, greater than the TWF, slightly higher than the CLF, and below the DO/RCLF.

Among minority groups, the representation of Hispanic men is lower compared to the FWF, TWF, CLF, and equal to the DO/RCLF. The representation of Hispanic women is lower compared to each of the four benchmarks, in particular, a 6 percent lower difference (2 percent) when compared to the TWF (8 percent). The representation of Black men is equal to or higher than each of the four benchmarks; and the representation of Black women is higher across three of the four benchmarks, with the exception being the TWF. (However, it is noteworthy that the representation of Black women in the Treasury-wide workforce is considerably higher at 20 percent.) The representation of both Asian men and Asian women is higher than each of the four benchmarks.

## SENIOR AND EXECUTIVE MANAGEMENT

Consistent with the EEOC definition of senior management as Federal General Schedule (GS)-15 and above, the Treasury Departmental Offices' focus has been oversight and monitoring of recruitment/outreach, hiring, advancement, and attrition in GS-15 and Senior Executive Service (SES) positions. Treasury Departmental Offices also tracked and monitored the racial/ethnic and gender representation of the GS-13-14 grade level workforce, which can serve as the pipeline for senior management. Although there are no specific goals for demographic representation by race/ethnicity and gender, comparison to the total Treasury Departmental Offices permanent workforce representation provides a general benchmark for the relative inclusion by group at upper and senior management levels (Table 7).

**Table 7**

**FY 2019 Treasury Departmental Offices (DO) Permanent Workforce by Upper Management Grade Groupings Compared to the Total Treasury DO Workforce\***

Demographic Groups	Treasury DO	Treasury DO SES	Treasury DO GS-15	Treasury DO GS-14	Treasury DO GS-13	Treasury DO GS-12 & below
Men	56%	76%	59%	55%	53%	42%
Women	44%	24%	41%	45%	47%	58%
Hispanic	5%	2%	3%	4%	7%	6%
White	63%	86%	82%	63%	55%	40%
Black	21%	6%	7%	19%	25%	45%
Asian	10%	6%	7%	14%	11%	7%
Other	0%	0%	1%	1%	2%	1%

\*Percentages have been rounded to whole numbers

**Permanent Positions.** For FY 2019, the representation of each minority group and women in permanent GS-15 and SES level positions are below the representation within the total Treasury Departmental Offices permanent workforce. There is no civilian labor force data comparable to SES level positions.

Minorities represent 36 percent of the total Treasury Departmental Offices permanent workforce, but represent only 18 percent of the GS-15 level positions and 14 percent of the SES level positions. There is greater minority representation in positions below the GS-15 level, i.e., 38 percent the GS-14 level, 47 percent at the GS-13 level (47 percent), and at GS-12-below levels (54 percent). For each minority group, underrepresentation compared to their respective total workforce benchmarks exists for Black employees in GS-14, GS-15, and SES positions, Asian employees in GS-15 and SES positions, and Hispanics at the GS-15 and SES positions.

Women represent 44 percent of the total Treasury Departmental Offices permanent workforce, but represented only 41 percent of the GS-15 level positions and 25 percent of the SES positions. The representation of women at the GS-15 level increased by 2 percent in FY 2019 (41 percent) compared to FY 2018 (39 percent); but decreased at the SES level by 3 percent in FY 2019 (24 percent) compared to FY 2018 (27 percent). The representation of women in positions below GS-15 exceeds their overall representation in the total workforce, i.e., 45 percent at the GS-14 levels, 47 percent at the GS-13 levels, and 58 percent at GS-12-below levels.

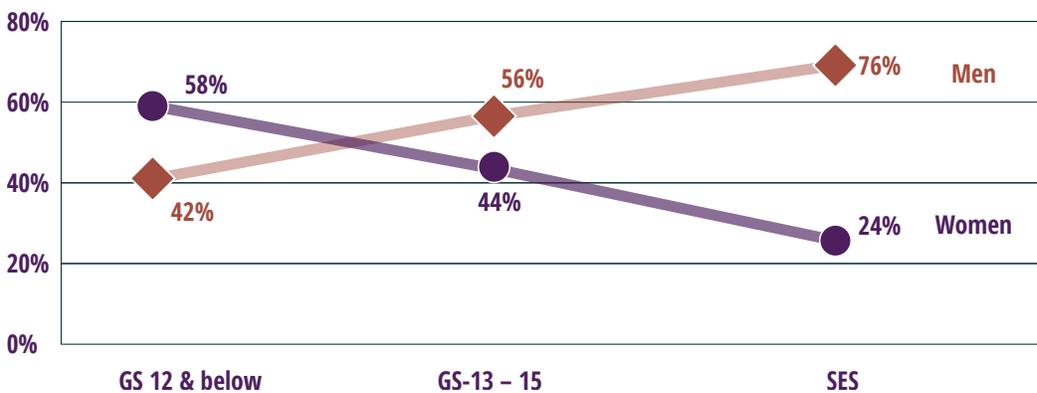
This lower representation of minorities and women at senior and executive levels and higher representation in positions below GS-15 have been consistent trends since OMWI began annual reporting in 2011.

**Presidentially Appointed Positions.** In FY 2019, three women were among the highest ranking Presidentialy-appointed positions in Treasury Departmental Offices, the Treasurer of the United States, the Undersecretary of the Office of Terrorism and Financial Intelligence, and the Assistant Secretary for Public Affairs. Appointed positions are not included by the Equal Employment Opportunity Commission in calculations of the permanent workforce census.

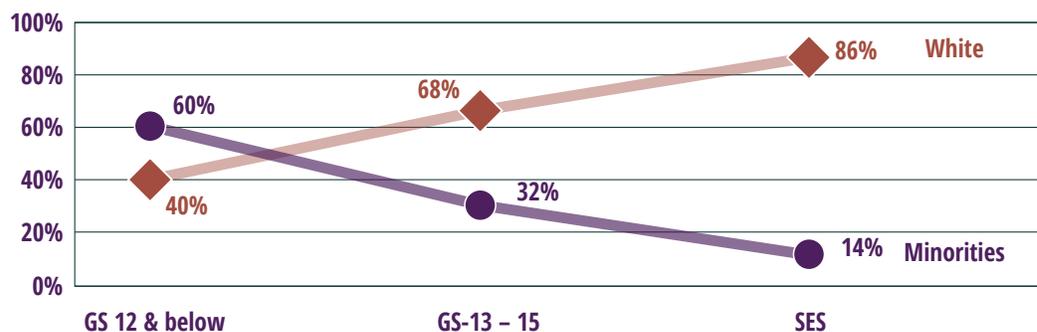
### ALL GRADE GROUPINGS

A comparison of the representation by gender and minority group status across all grade groups within the Treasury Departmental Offices Permanent Workforce shows the greatest number of women and minority employees are in GS-12 and lower positions, at 58 percent and 60 percent respectively (Figures 7 and 8).

**Figure 7**  
 Fy 2019 Departmental Offices Permanent Workforce Grade Comparison by Gender



**Figure 8**  
 Fy 2019 Treasury Departmental Offices Permanent Workforce Grade Comparison by Minority Status



## HIRING AND ATTRITION

**Hiring.** The hiring rates for gender and ethnic groups within the permanent workforce were compared over a five year period (FY 2015 through FY 2019). Compared to the average hiring rates for each respective group in the preceding four years (FY 2015 through 2018), hiring rates in FY 2019 were comparable (only +/- 1 percent). However, the greatest one year increase in hiring between FY 2018 and FY 2019 was for Black (+3 percent) and Asian (+6 percent) employees. (Table 8)

**Table 8**

Treasury Departmental Offices  
New Hire Trends of Permanent Workforce by Percentage of Employees Hired\*  
FY 2015-FY 2019

Fiscal year	Men	Women	Hispanic	White	Black	Asians
	% of total new hires		% of total new hires			
2015	56%	44%	6%	63%	16%	15%
2016	53%	47%	7%	58%	20%	12%
2017	63%	37%	7%	64%	15%	13%
2018	58%	42%	5%	75%	11%	7%
2019	57%	43%	6%	66%	14%	13%

\*Percentages have been rounded to whole numbers

**Attrition.** The attrition rates among gender and ethnic groups within the permanent workforce were compared over a five year period (FY 2015 through FY 2019). Compared to the average attrition rates for each respective group in the preceding four years (FY 2015 through FY 2018), attrition was higher in FY 2019 for Black employees and men; lower for women, White, and Asian employees; and unchanged for Hispanic employees.

The attrition rate was the highest for Black employees, which was 6 percent greater (23 percent) compared to the average over the preceding four years (17 percent). The attrition rate for men was 58 percent, compared to the average over the preceding four years (55 percent). For women, White, and Asian employees, the attrition rates were 42 percent, 64 percent, and 8 percent in FY 2019, compared to the averages over the preceding four years (45 percent, 67 percent, and 11 percent, respectively). The attrition rates for Hispanic employees remains unchanged at 5 percent, compared to the average of 5 percent over the preceding four years. (Table 9).

**Table 9**

Treasury Departmental Offices Attrition Analysis:  
Percentage Breakout by Gender and Race/Ethnicity\*

Fiscal year	Men	Women	Hispanic	White	Black	Asians
	% of total leaving		% of total leaving			
2015	49%	51%	3%	70%	16%	10%
2016	56%	44%	2%	68%	18%	12%
2017	60%	40%	7%	64%	16%	12%
2018	56%	44%	7%	64%	17%	10%
2019	58%	42%	5%	64%	23%	8%

\*Percentages have been rounded to whole numbers

**Attrition by Type.** In FY 2019, there was an attrition of 224 employees (compared to 225 employees in FY 2018). Of the four categories of attrition, all groups were more likely to resign or transfer in FY 2019, representing 81 percent of the attrition of the Treasury Departmental Offices workforce (Table 10).

**Table 10**  
FY 2019 Treasury Departmental Offices  
Attrition by Type and Demographic Group

Demographic Group	Resignations	Retirements	Transfers	Deaths	Total #	Total #
Men	62	27	42	2	133	59%
Women	39	14	38	0	91	41%
Hispanics	5	2	5	0	12	5%
Whites	76	23	44	1	144	64%
Blacks	11	15	23	1	50	22%
Asians	9	1	7	0	17	8%
Other	0	0	1	0	1	0%
<b>Total Attrition</b>	<b>101</b>	<b>41</b>	<b>80</b>	<b>2</b>	<b>224</b>	<b>100%</b>
<b>Percentages</b>	<b>45%</b>	<b>18%</b>	<b>36%</b>	<b>1%</b>		

\*Percentages have been rounded to whole numbers

Among all groups, White employees separated most from resignations than from retirement or transfers representing 64 percent of their attrition. Overall, attrition by race/ethnicity and gender was generally proportionate to their overall representation within the Treasury Departmental Offices workforce. Whites accounted for 64 percent of (144) total attrition and minorities accounted for approximately 36 percent of total attrition (80).

**Net Attrition of Minority Employees.** Change in overall minority representation due to the combination of hires and separation rates were compared across the past five fiscal years (FY 2015 through 2019), resulting in net gains of 7 percent, 10 percent, 0 percent and a net attrition of -11 percent, and -2 percent in the respective years. In FY 2019, there was an 8 percent increase in hiring and a 1 percent decrease in separation of minorities compared to FY 2018. The net attrition of minorities in FY 2019 was -2. (Table 11)

**Table 11**  
Treasury Departmental Offices  
Net Attrition or Gain of Minority Employees\*  
FY 2015-FY 2019

Workforce Demographics	2015	2016	2017	2018	2019
Rate of Hire	37%	42%	36%	25%	33%
Rate of Separation	30%	32%	36%	36%	35%
<b>Net Attrition or Gain</b>	<b>7%</b>	<b>10%</b>	<b>0%</b>	<b>-11%</b>	<b>-2%</b>

\*Percentages have been rounded to whole numbers

**Net Attrition Women Employees.** Changes in the representation among women employees due to the combination of hires and separation rates were compared across the past five fiscal years (FY 2015 through FY 2019), resulting in net attrition rates of -7 percent, -3 percent, -2 percent in FY 2015, 2017, and 2018 respectively; and net gains of 3 percent and 1 percent in FY 2016 and

FY 2019, respectively. In FY 2019, there was a 1 percent increase in hiring and a 2 percent decrease in separation of women compared to FY 2018, resulting in a net gain of 1 percent. (Table 12)

**Table 12**

Treasury Departmental Offices  
 Net Attrition or Gain of Women Employees  
 FY 2015-FY 2019

Workforce Demographics	2015	2016	2017	2018	2019
Rate of Hire	44%	47%	37%	42%	43%
Rate of Separation	51%	44%	40%	44%	42%
<b>Net Attrition or Gain</b>	<b>-7%</b>	<b>3%</b>	<b>-3%</b>	<b>-2%</b>	<b>1%</b>

\*Percentages have been rounded to whole numbers

## MISSION CRITICAL OCCUPATIONS TRENDS BY RACE/ETHNICITY AND GENDER

Within Treasury Departmental Offices (DO), there are five occupational series that are regarded as critical to supporting the mission and vision of Treasury. They are: Economist, General Attorney, Financial Analyst, Information Technology Specialist, and Intelligence Analyst. In this section, comparisons are made between the participation rates of the racial/ethnic and gender representations within each of these occupations in Treasury Departmental Offices permanent workforce from FY 2015 through FY 2019, compared to Occupational Civilian Labor Force (OCLF) data.<sup>16</sup>

**a. Economist:** Trends within the Economist (GS-0110) occupational series reveal a consistently lower representation of Hispanics and Blacks when compared to their OCLF across the five year period from FY 2015 through FY 2019. It also is striking to note that in this occupation no Hispanic women were hired in the last five years and no Black women were hired in the last two years. (Table 13)

**Table 13**

Treasury Departmental Offices  
 Economist Series Trends: Percent Employment by Race/Ethnicity and Gender  
 FY 2015-FY 2019

Fiscal Year	% Hispanic		% White		% Black		% Asian		% Total
	M	W	M	W	M	W	M	W	
<b>FY 2015</b>	2.02	0	56.06	29.29	1.01	0.51	7.58	3.54	100
<b>FY 2016</b>	2.46	0	58.62	25.12	0.99	0.49	8.89	3.45	100
<b>FY 2017</b>	1.97	0	57.64	26.11	0.99	0.49	6.4	6.4	100
<b>FY 2018</b>	1.68	0	57.54	27.37	1.12	0	5.59	6.7	100
<b>FY 2019</b>	2.05	0	58.97	25.64	0.51	0	4.62	7.69	100
<b>OCLF</b>	3.34	1.85	55.78	25.2	2.84	2.66	4.46	3.02	100

Key: Highlighted cell denotes that the percentage is below the OCLF;M-Men, W-Women.

**b. General Attorney:** In the General Attorney (GS-0905) occupational series, trends reveal that men continue to represent below their respective OCLF rates during a five year period from FY 2014 through FY 2018, with the exception of Asian men. Overall, all female groups and Asian males are represented at or above their respective OCLF rates (Table 14).

16. The OCLF, derived from the census, is the benchmark for the segments of society for the applicant pool. It includes those who are employed or seeking employment within that specific occupation who are 18 years of age or older, excluding the military and taking citizenship into consideration.

**Table 14**

Treasury Departmental Offices  
 General Attorney Series Trends: Percent Employment by Race/Ethnicity and Gender  
 FY 2015-FY 2019

Fiscal Year	% Hispanic		% White		% Black		% Asian		% Total
	M	W	M	W	M	W	M	W	
FY 2015	0.93	1.85	52.78	32.41	0.93	2.78	1.85	5.56	100
FY 2016	0.87	2.61	50.43	33.91	1.74	2.61	1.74	4.36	100
FY 2017	0.93	2.8	55.14	31.78	0.93	2.8	1.87	1.87	100
FY 2018	0.91	2.73	54.55	30	0.91	2.73	2.73	3.64	100
FY 2019	0.95	2.86	41.9	39.05	1.9	3.81	3.81	3.81	100
OCLF	2.52	1.85	59.68	26.68	2.13	2.6	1.82	1.74	100

Key: Highlighted cell denotes that the percentage is below the OCLF;M-Men, W-Women.

**c. Information Technology (IT) Specialist:** In the IT Specialist (GS-2210) occupational series, trends reveal that representation of Hispanics and Whites have been substantially below the OCLF rate across the five year period from FY 2015 through FY 2019, while Blacks and Asians have been represented consistently well above the OCLF rate in that same time period. (Table 15)

**Table 15**

Treasury Departmental Offices  
 Information Technology Specialist Series Trends: Percent Employment by Race/Ethnicity and Gender  
 FY 2015-FY 2019

Fiscal Year	% Hispanic		% White		% Black		% Asian		% Total
	M	W	M	W	M	W	M	W	
FY 2015	2.17	0.87	43.04	11.74	14.78	6.96	13.91	4.78	100
FY 2016	3.32	1.87	36.9	12.55	13.28	7.01	16.97	5.54	100
FY 2017	3.19	1.42	36.52	11.7	12.41	6.74	18.09	6.74	100
FY 2018	3.07	1.53	40.23	11.11	11.88	6.13	17.24	5.75	100
FY 2019	2.1	1.26	39.08	10.5	13.03	7.56	16.39	7.14	100
OCLF	5.39	2.17	52.21	20.89	6.61	4.5	5.14	1.55	100

Key: Highlighted cell denotes that the percentage is below the OCLF;M-Men, W-Women.

**d. Financial Analyst:** Trends within the Financial Analyst (GS-1160) occupational series across a five year period from FY 2014 through FY 2018 reveal a consistently lower than expected participation rate for Hispanics women, White men, and Asian men and women when compared to their OCLF participation rate. (Table 16)

**Table 16**

Treasury Departmental Offices  
 Financial Analyst Series Trends: Percent Employment by Race/Ethnicity and Gender  
 FY 2015-FY 2019

Fiscal Year	% Hispanic		% White		% Black		% Asian		% Total
	M	W	M	W	M	W	M	W	
FY 2015	3.7	0	48.15	25.93	3.7	9.26	1.85	5.56	100
FY 2016	3.39	0	40.68	27.12	6.78	15.25	1.69	3.39	100
FY 2017	3.33	0	40	23.33	10	13.33	3.33	3.33	100
FY 2018	1.89	0	33.96	24.53	9.43	18.87	3.77	5.66	100
FY 2019	1.67	0	38.33	31.67	5	11.67	1.67	6.67	100
OCLF	3.1	1.97	53.98	22.01	3.55	3.96	6.14	4.4	100

Key: Highlighted cell denotes that the percentage is below the OCLF;M-Men, W-Women.

**e. Intelligence Analyst.** Trends within the Intelligence Analyst (GS-0132) occupational series across a five year period from FY 2015 through FY 2019 reveal a consistently lower representation of Hispanic women, White women, Black men, and Asian women. However, in FY 2019 Hispanic men, White men, Black women, and Asian men were above the respective OCLF representation. (Table 17)

**Table 17**

Treasury Departmental Offices  
Intelligence Analyst Series Trends: Percent Employment by Race/Ethnicity and Gender  
FY 2015-FY 2019

Fiscal Year	% Hispanic		% White		% Black		% Asian		% Total
	M	W	M	W	M	W	M	W	
FY 2015	0.93	0.93	63.89	25.93	0	2.78	2.78	2.78	100
FY 2016	2.43	2.22	39.23	24.82	7.44	13.89	5.7	3.22	100
FY 2017	2.08	0	60.42	26.04	2.08	3.13	3.13	1.04	100
FY 2018	2.94	1.96	53.92	27.45	2.94	5.88	3.92	0	100
FY 2019	4.55	1.52	55.3	22.73	3.79	6.82	3.03	1.52	100
OCLF	2.81	3.36	38.77	40.68	4.16	4.59	1.52	2.3	100

Key: Highlighted cell denotes that the percentage is below the OCLF; M-Men, W-Women.

## STUDENT EMPLOYMENT

Internship and fellowship programs offer an excellent opportunity for Treasury Departmental Offices hiring officials to assess the qualifications and performance of promising students who may prove to be candidates for future positions. Treasury Departmental Offices offers three opportunities for student internships: an unpaid student volunteer internship program, the Pathways Program that provides paid internships, and a long-standing outreach effort to recruit diverse groups of students for paid internships through partnerships with minority-serving organizations and academic institutions. This latter effort is known as the Treasury Scholars Program, aiming to further expand the diversity of highly qualified candidates interested in internships in the Treasury Departmental Offices.

It should be emphasized that interns in the volunteer program are unpaid and Treasury Scholars internships are paid through a contractual arrangement with minority student serving organizations. However, the number of students supported by the Treasury Scholars Program is largely dependent on available program funding, which can vary considerably from year to year. Also, due to hiring restrictions imposed within Treasury in FY 2019, there were no students participating in the Pathways program, which are paid internships through Treasury's personnel budget.

In FY 2019, there were 190 student interns who served in Treasury Departmental Offices: 14 percent Asian (27), 12 percent Black (23), 8 percent Hispanic (15), 1 percent Native American (1), and 65 percent White (124). The greatest proportion of all of the 190 total student interns in Treasury Departmental Offices came through the volunteer program. Thirty and a half percent (54) of the 177 volunteer program students were racial or ethnic minority students: 13.5 percent (24) Asian, 9.6 percent Black (17), 7 percent (13) Hispanic, while 69.5 percent were White (123). Ninety two percent (12) of the 13 Treasury Scholars program students were racial or ethnic minority students: 23 percent (3) Asian, 46 percent Black (6), 15 percent (2) Hispanic, while 8 percent was White (1). Students came from leading colleges and universities, including Historically Black Universities (Howard University, Alabama A&M University, and Bowie State University) and a Hispanic Serving Institution (International American University of Puerto Rico, Arecibo). The Treasury Scholars program accounted for 18 percent (12 of 66) of the placements of minority interns in FY 2019. (Table 18)

**Table 18**

FY 2018 Treasury Departmental Offices  
Student Employment

Student Programs	Asian		Black		Hispanic		American Indian		Total Minority		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	
Volunteer fall, spring & summer	24	13.5%	17	9.6%	13	7%	0	0	54	30.5%	123	69.5%	177
Treasury Scholars summer only	3	23%	6	46%	2	15%	1	8%	12	92%	1	8%	13
# and %	27	14%	23	12%	15	8%	1	1%	66	35%	124	65%	190

\*Includes one student in fall 2019, one student in spring 2019, and 4 students in the summer 2019 only.

Over the past four years, Treasury has hosted a total of 293 minority students in the volunteer student program (240) and the Treasury Scholars program (53) combined. (Table 19 and Table 20) The Treasury Scholars program has been important in increasing the diversity of the overall number of student interns each year in Treasury Departmental Offices. On average over the past four years, 18% of the total number of minority interns has been directly attributable to the Treasury Scholars program. As much as 21% of the total number of minority interns was attributable to the Treasury Scholars program in a single year (14 of 66 minority students in FY 2018).

**Table 19**

FY 2016-2019 Treasury Departmental Offices  
Volunteer Student Employment

Student Programs	Asian		Black		Hispanic		American Indian		Total Minority		White		Overall Total
	#	%	#	%	#	%	#	%	#	%	#	%	
FY 2016	45	18%	22	9%	13	5%	0	0	80	33%	165	67%	245
FY 2017	20	10%	24	12%	8	4%	0	0	52	26%	143	74%	195
FY 2018	30	15%	13	6.5%	10	5%	1	0.5%	54	27%	144	73%	198
FY 2019	24	13.5%	17	9.6%	13	7%	0	0	54	30.5%	123	69.5%	177

**Table 20**

FY 2016-2019 Treasury Departmental Offices  
Treasury Scholars Program

Student Programs	Asian		Black		Hispanic		American Indian		Total Minority		White		Overall Total
	#	%	#	%	#	%	#	%	#	%	#	%	
FY 2016	1	6%	11	61%	5	27%	0	0	17	94%	1	6%	18
FY 2017	1	7%	10	72%	3	21%	0	0	14	100%	0	0	14
FY 2018	1	9%	5	45.5%	5*	45.5%	0	0	10*	100%	0	0	10
FY 2019	3	23%	6	46%	2	15%	1	8%	12	92%	1	8%	13

\*In FY 2018, one Treasury Scholars student self-identified as both Black and Hispanic and, therefore, counted in both category columns. However, in the total minority and overall total columns, the student was accounted for only once. New IQ Inclusion Quotient

## WORKPLACE INCLUSION

### INCLUSION QUOTIENT INDEX

The Federal Employee Viewpoint Survey (FEVS) is a government-wide tool that measures employee perceptions of whether, and to what extent, conditions characterizing successful organizations are present in their agencies. Survey results provide valuable insight into the challenges agency leaders face in ensuring the federal government has an effective civilian workforce and employees' perception about their workplace experience. The Office of Personnel Management (OPM) recently developed the Inclusive Environment Assessment, consisting of a subset of 20 questions derived from a rigorous statistical factor analysis. These 20 questions clustered around five factors that are associated with management behaviors: fairness, open mindedness, cooperation, supportiveness, and empowerment. Scores can be derived for each of these factors to comprise the Inclusion Quotient Index.

The most recent survey was administered by the OPM from April through June 2019. Overall scores below 65 percent on the New IQ Index are regarded as areas of challenge. Treasury Departmental Offices has an overall Diversity and Inclusion Index score of 63.49 percent in FY 2019, a 1.61 percent increase from the score of 61.84 percent in FY 2018. By comparison, the overall New IQ Index scores Treasury-wide and government-wide are 62.93 percent and 62.07, respectively.

For the specific factors associated with inclusion, Treasury Departmental Offices' FY 2019 scores on four of the five factors of inclusion are higher than those in FY 2018, however, below the 65 percent that Office of Personnel Management regards as minimally acceptable (Table 21). The highest factor increase was empowerment from the score of 56.61 percent in FY 2018 to 61.21 percent in FY 2019, a 4.60 percent increase.

Table 21  
FY 2019 Treasury Departmental Offices (DO)  
Comparison to Government-wide, Treasury-wide, and DO FY 2018 Scores on the Inclusion Quotient Index

Inclusion Factors	Gov	Treasury	DO FY 2018	DO FY 2019
<b>Fairness</b>	49.45%	51.59%	53.28%	54.75%
<b>Open-mindedness</b>	61.29%	61.81%	60.34%	60.48%
<b>Cooperation</b>	59.46%	61.35%	57.86%	60.31%
<b>Supportiveness</b>	79.05%	81.37%	81.12%	80.70%
<b>Empowerment</b>	61.11%	58.54%	56.61%	61.21%
<b>Average</b>	<b>62.07%</b>	<b>62.93%</b>	<b>61.84%</b>	<b>63.49%</b>

### BEST PLACES TO WORK RANKING

The annual Best Places to Work in the Federal Government<sup>17</sup> rankings, produced by the nonprofit, nonpartisan Partnerships for Public Service, measures employee engagement government-wide as well as at individual departments, agencies, and subcomponents. The rankings provide a means of holding leaders accountable for the health of their organizations, shining the spotlight on agencies that are successfully engaging employees as well as on those that are falling short. The 2019 Best Places to Work findings demonstrate that collectively the federal government has a lot of work remaining to support and strengthen the federal workforce. The report is available by several categories. It provides deep insight into the dynamics of the workforce, and opportunities to identify our most critical challenges and focus on transformation.

17. <https://bestplacetowork.org/rankings/overall/sub>

In the overall rankings of the Best Places to Work employee engagement score, Treasury Departmental Offices is third quartile (312 out of 420) among federal agency subcomponents. This category is calculated based on responses to three different questions in the FEVS:

Q. 40 - I recommend my organization as a good place to work

Q. 69 - Considering everything, how satisfied are you with your job?

Q. 71 - Considering everything, how satisfied are you with your organization?

The 2019 employee engagement score of 57.9 represents a 2.5 point increase from 2018, suggesting Treasury Departmental Offices management practices and initiatives are helping to promote greater employee engagement. However, management understands these initiatives must continue to see effective change.

The Best Places to Work subcategory “Support for Diversity” measures the extent to which employees believe that actions and policies of leadership and management promote and respect diversity. In this category, Treasury Departmental Offices is ranked in the third quartile (308 out of 414) among federal agency subcomponents, dropping 1.2 points to a rating of 58.1 percent from 2018.

The “Effective Leadership: Fairness” subcategory measures the extent to which employees believe disputes are resolved fairly in their work units, whether employees believe arbitrary action and personal favoritism are tolerated, and if employees feel comfortable reporting illegal activity without fear of reprisal. In this subcategory, Treasury Departmental Offices is ranked in the third quartile (259 of 413) among federal agency subcomponents, dropping 0.3 points to a rating of 57.1 percent from 2018 (Table 20).

**Table 22**

**Treasury Departmental Offices  
Best Places to Work Agency Rankings and Score  
FY 2019 and FY 2018**

Treasury Departmental Offices				
Rank	Quartile	2019 Score	2018 Score	Change
Best Places to Work				
312 of 420	3rd	57.9	55.4	2.5
Support for Diversity				
308 of 414	3rd	56.9	58.1	-1.2
Effective Leadership: Fairness				
259 of 413	3rd	56.8	57.1	-0.3

# INITIATIVES & ACCOMPLISHMENTS

## ORGANIZATIONAL TRANSFORMATION

### QUANTITATIVE AND QUALITATIVE ANALYSIS

**Diversity in the Hiring Process.** OMWI conducts an applicant flow analysis to determine the percentage of minority and women candidates participating at various stages of the hiring process. OMWI examines the aggregated flow of all applicants, the qualified applicants, the best qualified applicants and selections, men versus women, and minority versus non-minority applicants. The purpose of this monitoring is to identify disparities at each hiring stage.

**Representational Diversity.** OMWI conducts quantitative “deep dive” analysis of the workforce demography of the major policy and program offices that includes:

- Overall representation by race, gender, disability and veteran status
- Representation in the major occupations
- Demography of direct hires
- Demography of applicants
- Perceptions of the workplace environment
- Exit surveys and the reasons for leaving
- Performance ratings by race and gender.

OMWI briefs offices about the results of the analysis. OMWI then works with each of the program and policy offices to review any disparities in representation and areas of concern pertaining to workplace culture to determine the potential sources of problem areas and strategies to address them.

**Inclusion Index.** The Office of Personnel Management developed the Inclusive Environment Assessment (New IQ) index for use by federal agencies to assess factors within the workplace that are closely associated an inclusive environment. Using the New IQ index, OMWI began providing policy and program offices within Treasury Departmental Offices with a qualitative measure of employee perceptions of their workplace environment. So, in addition to providing data on representational diversity, OMWI also provides an assessment of the extent to which the workplace culture is perceived as inclusive.

### INCLUSIVE DIVERSITY AWARENESS AND TRAINING

**The & Council.** In FY 2017, OMWI established an employee resource group within Treasury Departmental Offices, called The & Council, to advance and leverage diversity within the organization’s culture and workforce by increasing workforce engagement, performance, diversity, and inclusion. The & Council, a single entity that focuses on the interests of various groups, serves as an innovative alternative to the traditional model of having separate Special Emphasis Program Managers for each of the different special emphasis groups. Members of The & Council serve as an idea factory to infuse cultural intelligence into the workplace on diversity and inclusion. Membership in The & Council is voluntary and consists of Treasury Departmental Offices employees at all levels who bring a broad range of perspectives to shape inclusive diversity efforts, representing a microcosm of the workforce: White; Black; Hispanic; Asian/Pacific Islander; American Indian; Alaska Native; women; lesbian, gay, bisexual and transgender; persons with disabilities; age 40+; and early career employees.

The & Council consists of an Executive Committee and subcommittees. The & Council agreed by consensus on its framework and four areas of work: 1) cultural transformation efforts to create a more inclusive work environment; 2) critical conversations to promote important but often difficult dialogues; 3) career advancement recommendations to mitigate demographic hierarchical distinctions or disparities; and 4) civil rights and equal opportunity issues to identify barriers to representational diversity and fairness.

**Multi-tiered Diversity and Inclusion Training.** Since FY 2013, OMWI has sponsored several training sessions on diversity and inclusion, with a focus on unconscious bias. These have been for senior leaders, managers and supervisors, as well as all other employees. The aim of this training is cultural transformation of the workplace by creating a cadre of like-minded diversity and inclusion champions who can serve as catalysts for change, leading development of improved management behaviors with the goal a more inclusive workplace environment.

Dr. Steve Robbins, an internationally recognized diversity and inclusion consultant, has been engaged by OMWI for four years to provide intensive training in the neuroscience of unconscious bias. In total, he has conducted 11 sessions for approximately 550 Treasury Departmental Offices participants. In FY 2019, OMWI continued an 18 month-long online video series created by Dr. Robbins that makes much of his training content available in an on-demand form to all Treasury employees in short segments. Titled Inclusion Insights, a new episode in this year-long video series is posted to the Treasury intranet every other week. Earlier episodes remain archived and available for reviewing. With the announcement of each new episode, discussion questions are provided and managers are encouraged to incorporate them in their staff meetings.

OMWI staff strive to design programming that frames issues of diversity and inclusion in compelling, relatable, and transformative ways. In FY 2019, OMWI hosted a theatrical performance entitled, Incognito, a one-actor play by Michael Fosberg that explores the meaning of racial identity on a personal level. This innovative approach to a very difficult subject set the stage for an open and meaningful discussion among the audience members immediately following the performance. OMWI also collaborated with the Office of the Treasurer to conduct a panel discussion to commemorate Hispanic Heritage Month. To ensure that staff who are responsible for diversity, equal employment opportunity and supplier diversity keep abreast of leading edge knowledge in these areas, the Offices of Minority and Women Inclusion across all eight financial services agencies collaborated on a multi-session symposium for the combined staff.

In FY 2019, the Treasury Executive Institute (TEI) established a curriculum and hosted diversity and inclusion training sessions for Departmental Offices employees and managers at the GS-14 through SES levels. These sessions included the following seminars:

- Book Discussion: Servant Leadership in Hard Times
- Case Study: Satya Nadella at Microsoft: Instilling a Growth Mindset
- Coaching Skills in the Workplace: Becoming a Conflict Competent Leader (Book Discussion)
- Coaching Skills in the Workplace: The Human Equity Advantage: Beyond Diversity to Talent Optimization (Book Discussion)
- Coaching Skills in the Workplace: Managers as Mentors (Book Discussion)
- Coaching Skills in the Workplace: Mentoring Skills
- Delegating Smartly
- Developing Interpersonal Skills
- IDisc: A Workplace Communication and Teamwork Skill
- Leading for Respect: How Supervisors and Managers Can Create Respectful Workplaces
- Mentoring Matters: Flash Mentoring
- The Fearless Organization: Creating Psychological Safety in the Workplace
- Vital Smarts: Crucial Conversations On Demand Program: Tools for Talking When Stakes Are High

Finally, in commemoration of the federally designated heritage months, OMWI develops personal profiles of members of the Treasury staff who represent the specific cultural heritage celebrated. The profiles are featured on the Treasury intranet, and posted on the electronic bulletin boards throughout the various Treasury facilities.

## COMMUNITY EMPOWERMENT

### OUTREACH

Treasury Departmental Offices has had long standing partnerships with existing external internship programs that attract diverse and highly qualified students. OMWI established the Treasury Scholars Program in 2012 as a paid internship program in collaboration with organizations serving minority students, such as the National Association for Equal Opportunity in Higher Education, Hispanic Association of Colleges and Universities National Internship Program, the Washington Center, the International Leadership Foundation, the Congressional Hispanic Caucus Institute, and others. However, because of the recent increase in the number of new organizations with similar capabilities, it is no longer permissible to use sole source contracting with specific organizations.

In FY 2015, OMWI issued a competitive solicitation for such organizations to become part of a five-year blanket purchase agreement for the Treasury Scholars Program. Three organizations responded to the solicitation: INROADS, the Hispanic Association of Colleges and Universities National Internship Program, and the Washington Center. In FY 2019, OMWI offered paid internships to 13 students via the Treasury Scholars Program. These students were placed in policy and program offices throughout Treasury Departmental Offices, including International Affairs, Office of the Treasurer, Office of Budget and Travel, and Office of the Chief Information Officer. Students came from leading colleges and universities, including Historically Black Universities (Howard University, Alabama A&M University, and Bowie State University) and a Hispanic Serving Institution (International American University of Puerto Rico, Arcibo).

### FINANCIAL LITERACY

The Secretary of the Treasury serves as Chair of the Financial Literacy and Education Commission (FLEC), comprising 23 federal government entities, created in 2003 to improve “the financial literacy and education of persons in the United States.” The Office of Consumer Policy provides expertise and support to the FLEC and leads the Treasury Department’s work to empower more Americans to create financially secure futures for themselves and for their families, with access to safe and affordable financial products and services and the right information and knowledge for making sound financial choices.

In FY 2019, Treasury issued a report on [Federal Financial Literacy Reform: Coordinating and Improving Financial Literacy Efforts](#).<sup>18</sup> The scope of the report addresses a number of issues and recommendations. Treasury’s recommendations in this report can be summarized in the following four categories:

- A governance structure, as permitted by the FLEC’s enabling statute, for federal financial literacy efforts that articulates the proper role of government, and where possible, avoids duplicative activities, and leverages the work of nonprofit organizations, the private sector and state and local government.
- Coordination of existing federal financial literacy and education programs and policy proposals for basic financial capability (including access to financial services, saving, and credit), retirement savings and investor education, housing counseling, postsecondary education, and military and their families.
- Identification of best practices and potential metrics for evidence-based, effective financial education programs that will allow responsible agencies to consider elimination or modification of programs that do not lead to greater financial capability and changes in financial behavior.
- Identification of the future challenges and opportunities associated with technology and financial education.

Additionally, in 2019 the FLEC released a report entitled [Best Practices for Financial Literacy and Education at Institutions of Higher Education](#).<sup>19</sup> The report provides recommendations for higher education institutions to deliver effective financial literacy education and resources to help students make informed decisions and avoid pitfalls associated with financing education. Best practices for evidence-based, effective financial education covered in the report include:

18. <https://home.treasury.gov/system/files/136/FLECRCoordinatingImprovingFinancialLiteracyEfforts.pdf>

19. <https://home.treasury.gov/system/files/136/Best-Practices-for-Financial-Literacy-and-Education-at-Institutions-of-Higher-Education2019.pdf>

- Providing clear, timely, and customized information to inform student borrowing
- Effectively engaging students in financial literacy and education
- Targeting different student populations by use of national, institutional, and individual data
- Communicating importance of graduation and major on repayment of student loans
- Preparing students to meet financial obligations upon graduation.

## ACCOUNTABILITY

**Leadership Commitment.** Secretary Mnuchin was confirmed by the United States Senate on February 13, 2017 to serve as the 77th Secretary of the Treasury. Secretary Mnuchin issued a Diversity and Inclusion Commitment Statement on November 17, 2017 that was disseminated to all Treasury employees and invited employees to display their own statement of commitment with a personalized Diversity and Inclusion Certificate. The Secretary issued this statement separately from the mandatory annual equal employment opportunity (EEO) policy statement, thus making a clear distinction between strategic diversity management and EEO compliance. In his statement, he set his expectations for the shared values of all Treasury employees, as follows:

*We are committed to diversity, inclusion, and dignity for all people. We value the many ways people are different, including their social identity, training, experiences, and interest. We aspire to have a workplace environment within Treasury where all people feel their unique talents, ideas, perspectives, and contributions are valued, respected and fully utilized*

**SES Performance Plans.** To establish accountability relative to workforce diversity and inclusion, the Leading People performance element on which all SES level Treasury employees are evaluated includes the following criteria:

Recruits, retains, and develops the talent needed to achieve a high quality, diverse workforce that reflects the nation, with the skills needed to accomplish organizational performance objectives while supporting workforce diversity, workplace inclusion, and equal employment policies and programs.

Throughout Treasury, the Leading People performance element, which is one of the four Executive Core Qualifications for senior executives in the federal government, has twice the weight of the other three elements, i.e., Leading Change, Business Acumen, and Building Coalitions. This higher value accounts for the diversity component of the Leading People element in addition to other leadership characteristics.

**Supervisor and Employee Performance Plans.** Diversity and Inclusion performance elements have been drafted for the performance plans of all managers, supervisors, and employees in Treasury Departmental Offices. The Diversity and Inclusion Critical Element will account for at least 10 percent of the total weight for employees and for supervisors.

The Diversity and Inclusion element must at a minimum contain language that requires the supervisor/manager to:

- Advance the goals of the Treasury Diversity and Inclusion Strategic Plan;
- Effectively and collaboratively work with employees, senior leaders, customers, peers, and stakeholders from diverse backgrounds;
- Regularly exhibit behaviors that demonstrate respect and professional courtesy towards others within the workplace, by maintaining fair and impartial delivery of programs, work products, and services; and,
- Consistently demonstrate respect for employees within the workplace and interact in a manner that demonstrates professional courtesy and does not include harassing or bullying behaviors.

The Diversity and Inclusion element must at a minimum contain language that requires all other employees to:

- Participate in creating and maintaining an inclusive work environment; and,
- Interact with peers, supervisors, customers and stakeholders from all backgrounds in a manner that demonstrates professional courtesy and does not include harassing or bullying behaviors toward any group of employees.

- These new performance elements are anticipated to be finalized before the end of FY 2020.
- Interact with peers, supervisors, customers and stakeholders from all backgrounds in a manner that demonstrates professional courtesy and does not include harassing or bullying behaviors toward any group of employees.

These new performance elements are anticipated to be finalized before the end of FY 2019.

**Inclusive Diversity Strategic Plan for Fiscal Years FY 2017 – 2020.** In FY 2017, the Office of Civil Rights and Diversity developed an Inclusive Diversity Strategic Plan. This plan requires Treasury Bureaus, including Departmental Offices, to establish a new implementation plan for carrying out the strategic objectives outlined. The Inclusive Diversity Strategic Plan provides a framework to ensure that:

- Recruitment policies are sufficiently broad to afford maximum flexibility and enable recruitment of well-qualified candidates from a wide variety of sources;
- Internal barriers do not impede the hiring, promotion, or retention of any candidate or employee because of his or her race, gender, national origin, age, color, religion, disability, sexual orientation, parental status, protected genetic information, or any other non-merit factor;
- The Department develops a culture of inclusiveness, where every employee is given the opportunity to contribute; and
- Managers and leaders are accountable for the success of this initiative.

Considering the agency strategic plan will end at the end of FY 2020, the OMWI, Office of Equal Employment Opportunity, and Office of Human Resources will partner in 2020 to establish the Treasury Departmental Offices new implementation plan that will hold the agency leadership accountable for results in diversity efforts, ensuring those efforts are not only aligned with mission needs, but are also effective, efficient, and merit-based.

## CHALLENGES

Treasury Departmental Offices is committed to adopting leading edge strategies to secure a high performing workforce drawn from a diverse pool of candidates. The continuing challenges to implementing the workforce diversity provisions of Dodd-Frank Act § 342 have been retaining Black employees, identifying and mitigating the root causes for underrepresentation of Hispanic employees in multiple areas, determining the systemic barriers to the employment and advancement of minorities and women in senior and executive level positions and specific mission critical occupations, and changing the workplace culture to one that is perceived as more inclusive by employees.

**Diversity:** Overall, the Departmental Offices workforce is racially diverse with Black and Asian employees represented at or above nearly all relevant benchmarks. The one exception is the representation of Black women in the Departmental Offices, which is lower than the notably higher benchmark prevalence of Black women in the Treasury-wide workforce of 20 percent. With regard to ethnic diversity, Hispanic employee remain underrepresented (refer to description below).

With regard to gender, the Treasury Departmental Offices representation of women overall is below three of the four benchmarks, with the exception being the federal workforce. But, the representation of White women is lower across all of the four benchmarks.

**Hiring.** Hiring restrictions were imposed in FY 2017 and FY 2018, limiting opportunity for Treasury Departmental Offices to hire and to impact workforce diversity. Subsequently, the hiring freeze was lifted in early 2019, but resulted in only small differences in the overall hiring rates of women and minority groups compared to the average hiring rates in the preceding four years (only +/- 1 percent differences). For specific minority groups, there was a notable increase in hiring in FY 2019 compared to the prior year. Hiring of Black employees increased by 3 percent and Asian employees increased by 6 percent.

**Retention.** Although the hiring of Black employees was 14 percent, which was an increase of 3 percent compared to the prior year, the separation rate was the highest for Black employees (23 percent) compared to other minority groups. Therefore, the net attrition rate for Black employees was also the highest of all minority groups at -9 percent. By contrast, there was a 5 percent net gain in the percentage of Asian employees when comparing hiring and separation rates in FY 2019.

**Hispanics.** The low representation of Hispanic employees in Treasury Departmental Offices has been an apparent challenge in several areas. Among all minority groups, Hispanic employees are represented at the lowest percentage (5 percent). Hispanic representation in the workforce is also lower than all four relevant benchmarks (FWF, TWF, CLF, and DO/RCLF). Hispanic representation at senior management (GS14 and GS15) and senior executive (SES) levels is below their overall representation in the Departmental Offices workforce. Further, over the past five years, there has been a consistent underrepresentation of Hispanics compared to the Occupational Civilian Labor Force (OCLF) in 3 of the 5 mission critical occupations (with the exceptions of General Attorney for Hispanic women and Intelligence Analysts for Hispanic men). In FY 2019, Hispanic employees have been hired at rate of 6 percent and an attrition rates of 5 percent, resulting in a net gain of 1 percent. Such small net gains in Hispanic employment have remained consistent over the past five years.

Senior and Executive Management. In FY 2019, the representation of each minority group and women in permanent GS-15, and SES level positions are below their representation within the Treasury Departmental Offices permanent workforce. The representation of women at the GS-15 level increased by 2 percent in FY 2019 (41 percent) compared to FY 2018 (39 percent); but decreased by 3 percent at the SES level in FY 2019 (24 percent) compared to FY 2018 (27 percent). There is comparable underrepresentation of Black employees in GS-14, GS-15, and SES positions, Asian employees in GS-15 and SES positions, and Hispanics at the GS-15 and SES positions.

**Mission Critical Occupations.** There are five occupations that are considered mission critical: economist, attorney, financial analyst, information technology, intelligence analyst. Economists and financial analysts are the occupations that present the greatest challenges with race/ethnicity and gender diversity with representation below the occupational civilian labor force (OCLF).

Among minority groups, Hispanics have the least representation in positions in all mission critical occupations, except the representation of Hispanic women in attorney positions. Black women and men are underrepresented as economists and financial analysts. Among women, White women are underrepresented in information technology and intelligence analysis.

On the other hand, Asians (men and/or women) are represented above the OCLF in positions across all mission critical occupations. Among women, all racial/ethnic groups are represented above their respective OCLF among attorneys. White women are also represented above the OCLF among economists and financial analysts; and Black women are also represented above the OCLF among information technology and intelligence analysts.

**Inclusion.** The government-wide scores derived from the FEVS Inclusion Quotient Index show that perceptions of workplace inclusion have been a consistent challenge across most federal agencies. Treasury Departmental Offices has an overall Inclusion Quotient Index score of 63.49 percent in FY 2019, a 1.61 percent increase from the score of 61.84 percent in FY 2018. But, the FY 2019 score is below the minimally acceptable score of 65 percent as established by the Office of Personnel Management (OPM). Additionally, Treasury Departmental Offices scores were below the minimally acceptable level on four of the five factors that comprise the overall inclusion score. The continuing challenge is to create a workplace environment that is perceived by employees as being more inclusive. Specifically, emphasis will be on mitigating underlying causes for low perceptions about fairness, open mindedness, cooperation, and empowerment in the workplace. OMWI will be exploring new tools and methods to better understand the sources of these perceptions and develop appropriate interventions, such as interim pulse surveys at the office level in addition to the annual government-wide employee survey. GS-15 level decreased by 2 percent compared to FY 2017 (41 percent); but remained unchanged in the SES level. There is comparable underrepresentation of Black employees in GS-14, GS-15, and SES positions and Asian employees in GS-15 and SES positions.

Fourth, the government-wide scores derived from the OPM New IQ inclusion quotient tool show that workplace inclusion is challenging across federal agencies. Treasury Departmental Offices has an overall Diversity and Inclusion Index score of 61.84 percent in FY 2018, a 2.82 percent decrease from the score of 64.66 percent in FY 2017. The FY 2018 score is 3.16 percent short of the 65 percent that the Office of Personnel Management regards as acceptable. The new challenge is to regain momentum in creating an overall workplace environment that is perceived by employees as being inclusive. Part of that challenge will be to mitigate underlying causes for perceptions about fairness, open mindedness, cooperation, and empowerment. OMWI will be exploring new tools and methods to better understand the sources of these perceptions and develop appropriate interventions,

such as interim pulse surveys at the office level in addition to the annual government-wide employee survey.

## FISCAL YEAR 2020 PLANS

OMWI will continue to lead efforts to increase workplace diversity at the higher levels, i.e., GS-13 through GS-15 and SES, and in mission critical occupations. Programs will be continued to train employees with the goal of changing the workplace culture to one that is perceived as more inclusive, as measured by the Federal Employment Viewpoint Survey and Best Places to Work rankings. OMWI's efforts toward greater workforce diversity and inclusion in FY 2020 will include the following:

**Accountability.** OMWI, in collaboration with the Office of Civil Rights and Diversity, will continue to monitor and develop regular reports on the racial/ethnic and gender demography of the workforce across Treasury Departmental Offices and within the major policy and program offices to identify areas of disparity. Such reports will provide ongoing tracking for use by the policy and program offices and leadership, including the quarterly performance reviews conducted by senior leadership. Additionally,

OMWI will continue to explore the use of new metrics and benchmarks to increase understanding of possible barriers and establish aspirational standards for workplace diversity and inclusion. In collaboration with the Treasury Human Capital Office and the Office of Civil Rights and Diversity, OMWI will support efforts to implement the specific performance elements for diversity and inclusion for supervisors, managers, and all other employees.

**Workplace Culture.** OMWI will continue to offer varied programs to promote a culture of inclusion within Treasury Departmental Offices, specifically focused for senior leadership, managers and supervisors, and all other employees. The aim is to produce an overall cultural transformation within Treasury Departmental Offices and to increase the number of employees throughout the policy and program offices who have common mindset and core knowledge regarding workplace inclusion.

**Recruitment/Hiring/Outreach.** OMWI will seek to use social media outreach efforts to increase the number of minority professionals who are made aware of all position announcements, particularly upper management, senior executive, and mission-critical positions in Treasury Departmental Offices. OMWI will continue to track the hiring rates of women and minority employees, to develop strategies to reverse negative trajectories and sustain or raise the neutral and positive trajectories. OMWI will work to identify and mitigate factors that may be the source of under-identification, hiring, and retention of Hispanics.

OMWI will continue to utilize its blanket purchase agreement contract vehicle to access recruitment services from organizations and institutions that serve minority students for internships to increase the diversity of interns within Treasury Departmental Offices and, thereby, offering opportunities to the American public.

# APPENDIX

## LIST OF ABBREVIATIONS

CDFI	Community Development Financial Institutions Fund
CDFI Program	Treasury's Community Development Financial Institutions Program
CDLF	Community development loan funds
CLF	Civilian labor force
DO	Departmental Offices
DO/RCLF	Relevant civilian labor force for Departmental Offices
Dodd-Frank Act	Dodd-Frank Wall Street Reform and Consumer Protection Act
DOL	Department of Labor
EEO	Equal Employment Opportunity
FAA	Financial Agent Authority
FAR	Federal Acquisition Regulation
FEVS	Federal Employee Viewpoint Survey
FLEC	Financial Literacy and Education Commission
FWF	Federal government-wide work force
FY	Fiscal Year
GSA	General Services Administration
HBCU	Historically Black Colleges and Universities
HUBZone	Historically underutilized business zones
MWOB	Minority-owned and Women-owned Businesses
NAICS	North American Industry Classification System
New IQ	Inclusive Environment Assessment
OCLF	Occupational civilian labor force
OFCCP	Office of Federal Contract Compliance Programs
OHR	Office of Human Resources
OMWI	Office of Minority and Women Inclusion
OPM	Office of Personnel Management
PPC	Persistent poverty counties
SBLF	Small Business Lending Fund
SDB	Small disadvantaged businesses
SMWOB	Small, minority-owned, and women-owned businesses
TEI	Treasury Executive Institute
the Act	Small Business Jobs Act of 2010
TWF	Treasury-wide work force
WOSB	Women-owned small businesses



