



OFFICE OF
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

October 17, 2022

MEMORANDUM FOR SECRETARY JANET L. YELLEN
VENTRIS C. GIBSON, DIRECTOR OF THE U.S. MINT

FROM: Richard K. Delmar, Deputy Inspector General
/s/

SUBJECT: Inquiry into Allegations of Racially Disparate Treatment of
U.S. Mint Employees (USM-21-0002-I and OIG-CA-23-003)

On July 10, 2020, the Department of the Treasury (Treasury) Office of Inspector General (OIG) received a letter from then-Secretary of the Treasury, Steven Mnuchin,¹ regarding a complaint received from six African American U.S. Mint (Mint) employees (complainants). The complainants alleged a pattern of “rampant racism,” an “oppressive environment,” and “systematic racism” against African American employees at the Mint. Former Secretary Mnuchin and former Mint Director Ryder² requested the OIG undertake an inquiry regarding these allegations.

The OIG initiated a review of workforce diversity and personnel practices at the Mint to determine whether:

1. There are patterns or practices of racial discrimination, including but not limited to, intimidation or disproportionate and meritless investigatory actions; and

¹ Janet Yellen was confirmed as Secretary of the Treasury on January 25, 2021 and sworn in on January 26, 2021.

² Director Ryder resigned on October 1, 2021. Ventriss Gibson served as Mint Deputy Director (Acting Director) beginning October 25, 2021 and was confirmed as Mint Director on June 15, 2022.

2. The quality of the Equal Employment Opportunity (EEO) and other complaint processes are satisfactory.

The OIG conducted interviews with Mint officials and staff from the Diversity Management and Civil Rights, Human Capital, Protection, and General Counsel Directorates. Interviews were also held with willing complainants³ and union representatives, as well as other Mint employees recommended for interview by the complainants. Officials from Treasury's Office of Civil Rights and Diversity were interviewed and provided data for our inquiry. Specifically, we received and reviewed data from EEO complaints for fiscal year (FY) 2017 through FY2021. Additional data reviewed included: Management Inquiries (MI); Administrative Investigations (AI) completed by, or for, the Mint for FY2015 through FY2020;⁴ the Mint Federal Employee Viewpoint Survey (FEVS) results for FY2017 through FY2021; the U.S. Mint FY2019 EEO, Diversity and Inclusion, and Civil Rights Programs Audit Report; the Federal Mediation and Conciliation Service (FMCS) 2020 Conflict Assessment; and the TI Verbatim Consulting (TIVC) 2021 Mint Culture Assessment and Strategic Action Plan reports. We also reviewed Mint employee demographics, including the overall percentage of Black or African American employees at each grade within the organization. See Appendix 1 for more detail on the scope and methodology related to our work.

Executive Summary

We found that the quality of the Mint's EEO program is generally satisfactory; however, there are opportunities to improve certain aspects of how anti-harassment program complaint data (including inquiry information such as MIs and AIs) are tracked and analyzed. In addition, the Mint's outdated policies for how complaints are investigated create confusion among employees and potential risk for the agency.

Due to the scope of our review and challenges with access to complete and reliable data, we were neither able to substantiate nor unsubstantiate whether there are patterns or practices of racial discrimination; however, we made a number of key observations using available workforce and formal EEO complaint statistics.

Our review of workforce statistics showed that the percentage of Black or African American General Schedule (GS) workforce at the Mint among the higher grades was

³ Five (5) of the 6 signatories of the letter agreed to be interviewed.

⁴ The Mint has two levels of fact-finding inquiries – Management Inquiries and Administrative Investigations. See pages 9-11 for a more detailed discussion of AIs and MIs.

higher than the overall percentage of the Black or African American GS workforce for the rest of Treasury; however, among the Non-GS workforce at the Mint, we observed that the percentage of Black or African American employees in higher grade positions was appreciably lower when compared to the overall percentage of Black or African American employees in the Non-GS workforce for the rest of Treasury (primarily BEP).

Our review of formal EEO complaints over a 5-year period from FY2017 through FY2021 found a higher percentage of complaints filed with alleged discrimination on the basis of race, Black or African American, at the Mint when compared to the rest of Treasury, and complaints on this basis are increasing at a higher rate at the Mint. In addition, we observed that reprisal claims at the Mint were filed by Black or African American employees more often than by employees of all other races combined.

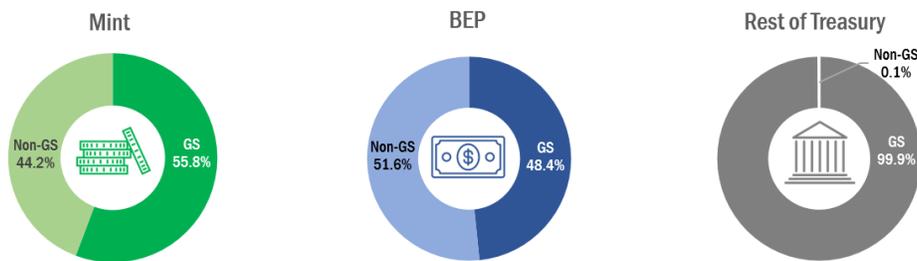
While we were unable to identify a definitive root cause for these observations, we believe that a number of the recent actions taken by Mint management are steps in the right direction, and we recommend that Mint management continues proactively addressing the findings from the TIVC Culture Assessment as well as the Treasury OCRD audit and FMCS conflict assessment. We plan to follow up on the Mint's progress in implementing corrective actions in response to our recommendations as well as the reports issued by TIVC, OCRD, and FMCS. We will work with Mint management on the timing of our follow-up review.

Mint Workforce Analysis

As of July 2022, the Mint was authorized 1,705 Full-time Equivalent (FTE) personnel. Unlike most of Treasury, a significant proportion of the Mint's workforce is comprised of Non-GS employees on the Federal Wage System (FWS), in addition to employees on the GS pay system. The FWS is a uniform pay-setting system that covers Federal blue-collar employees who are paid by the hour. The system's goal is to make sure that Federal trade, craft, and laboring employees within a local wage area who perform the same duties receive the same rate of pay. In comparison, the GS pay system covers most white-collar civilian Federal employees. There are a number of other differences between the GS and FWS in terms of occupational coverage, geographic coverage, pay ranges, and pay adjustment cycles.

Based on data contained in the Mint’s Management Directive (MD) - 715 Workforce Data Tables,⁵ and depicted in Figure 1 below, between FY2017 and FY2021 the Mint employed an average total workforce of 1,595 employees including an average of 55.8 percent GS and 44.2 percent Non-GS (FWS) employees. The only other Treasury bureau with a large proportion of Non-GS employees is Treasury’s other manufacturing facility, the Bureau of Engraving and Printing (BEP). During the same period, BEP’s workforce average was 48.4 percent GS and 51.6 percent Non-GS employees. In comparison, the rest of Treasury was comprised of 99.9 percent GS employees.

Figure 1: Workforce Distribution between GS and Non-GS Employees

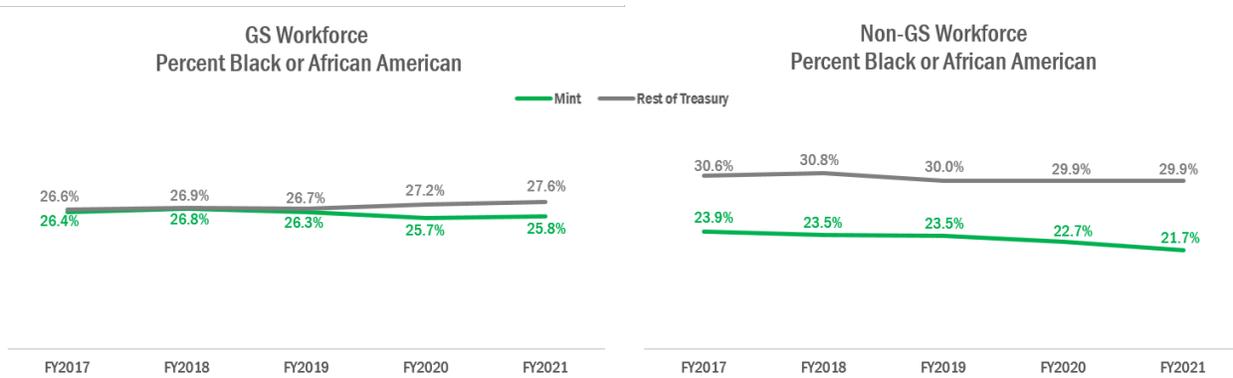


When examining the GS and Non-GS workforce, we found that the percentage of Black or African American employees at the Mint has been generally consistent over the last five fiscal years. As shown in Figure 2 below, in FY2021 the GS workforce of the Mint was comprised of 25.8 percent Black or African American employees, while 21.7 percent Black or African American employees made up the Non-GS workforce. During the same time period, the GS workforce of the rest of Treasury was comprised

⁵ According to the Equal Employment Opportunity Commission (EEOC), MD-715 Workforce Data Tables are useful as a diagnostic tool. MD-715 requires agencies to report on the race/ethnicity and gender of employees as well as information that includes, but is not limited to, occupational categories, pay plans/grade levels, and gains and losses in the total workforce. MD-715 Workforce Data Tables used for the analysis discussed in this report include (1) Table A1: Total Workforce Distribution by Race, Ethnicity, and Sex, (2) Table A4-1: Senior Pay & General Schedule (GS) Grades - Distribution by Race, Ethnicity, and Sex (Across), and (3) Table A4WG-1(All): Participation Rates Across Wage Grades.

of 27.6 percent Black or African American employees compared to 29.9 percent for the Non-GS workforce.⁶

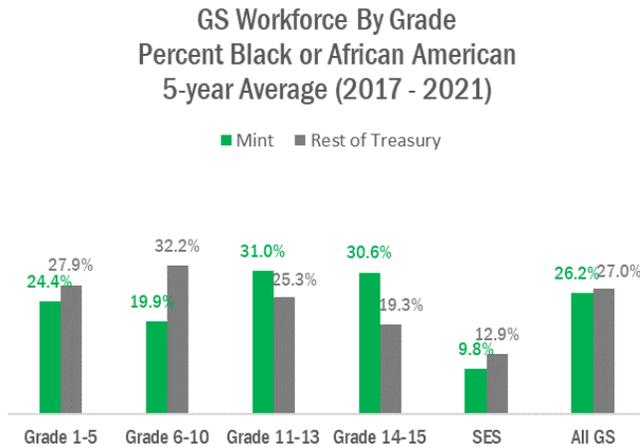
Figure 2: Black or African American Employees in the GS and Non-GS Workforce



As shown below in Figures 3 and 4, when examining the workforce by grade level, we computed the 5-year average for the GS and Non-GS populations. The percentage of Black or African American GS workforce at the Mint (see Figure 3) among the higher grades of 11 to 15 was appreciably higher than the overall percentage of the Black or African American GS workforce for the rest of Treasury. The percentage is even more pronounced when focusing on GS Grades 14 and 15. For example, Black or African Americans comprised approximately 30.6 percent of all GS Grades 14 and 15 compared to approximately 19.3 percent for the rest of Treasury.

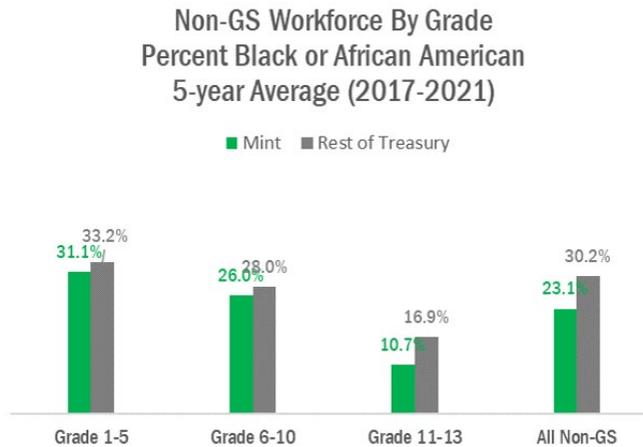
⁶ The rest of Treasury’s Non-GS workforce is primarily comprised of BEP employees as BEP is the only other Treasury bureau that has a manufacturing facility.

Figure 3: Black or African American Employees by Grade in the GS Workforce



Among the Non-GS workforce at the Mint, as shown in Figure 4, we observed that the percentage of Black or African American employees at grade levels 11 through 13 was lower when compared to the overall percentage of Black or African American employees in the Non-GS workforce for the rest of Treasury. Black or African Americans at the Mint comprised 10.7 percent of all Non-GS Grades 11 through 13 positions even though they comprised 23.1 percent of the Non-GS workforce at the Mint based on the 5-year average (2017-2021).

Figure 4: Black or African American Employees by Grade in the Non-GS Workforce⁷



Background on Equal Employment Opportunity (EEO) Complaint Processes and Anti-Harassment Programs

According to Equal Employment Opportunity Commission (EEOC) guidance, federal agency Equal Employment Opportunity (EEO) programs should have both an EEO complaint process and an Anti-Harassment Program.⁸ The EEO complaint process and an Anti-Harassment Program serve different purposes, but each is a critical component to address harassment allegations. Unlawful harassment includes but is not limited to unwelcome conduct (whether they occur in person, online or by email, on social media, or by any other manner), intimidation, ridicule, insult, offensive comments, jokes, or physical conduct based on race, color, religion, sex (pregnancy, sexual orientation, gender identity), national origin, age (over 40), disability, genetic

⁷ The non-GS workforce includes multiple pay plans that we consolidated in order to summarize by grade. We are not displaying non-GS grades 14 and 15 because the Mint has very few employees at these levels.

⁸ EEO Management Directive 715 (EEO MD-715), *Reporting Requirements for Federal Agencies*, (Oct. 1, 2003). Agencies must establish an anti-harassment program (including anti-harassment procedures/policy) outside the EEO complaint process. See also, *Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors* (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999). An employee or applicant can file concurrent complaints under the agency's anti-harassment and equal opportunity processes.

information, or reprisal/retaliation. Even though the EEO complaint process and Anti-Harassment Program serve two distinct purposes, both processes can occur simultaneously, if an alleged victim seeks to pursue both options. At a minimum, however, all harassment allegations must be reported to the Anti-Harassment Program per EEOC guidance.

The EEO complaint process is an employee-driven process that is designed to make individuals whole by focusing on equitable relief and damage awards paid by the agency to the alleged victim. EEO complaints may result in various types of monetary and/or nonmonetary remedies such as requested relocation and leave restoration. The EEO complaint process is not primarily designed to discipline an alleged harasser.⁹ Even though a manager or coworker may refer an allegation to the EEO office,¹⁰ moving forward with an EEO complaint is dependent on what the alleged victim ultimately decides.

In contrast to the employee-driven EEO complaint process, the Anti-Harassment Program is a management-driven process that is designed to take immediate and appropriate corrective action to stop harassing behavior regardless of whether the conduct violated the law and regardless of whether the employee is making the complaint or pursuing corrective action. The primary objective of the Anti-Harassment Program is to eliminate such conduct before it becomes severe or pervasive. According to EEOC guidance, the Anti-Harassment program should focus solely on taking whatever action is necessary to promptly bring the harassment to an end or to prevent it from occurring. Furthermore, depending on the severity of the conduct and surrounding circumstances, the corrective action may be as simple as speaking with an employee about their behavior or as severe as termination of employment. Even though EEOC guidance requires that all harassment allegations be reported to the Anti-Harassment Program, not all harassment allegations will necessarily have an associated EEO complaint, as the employee may elect not to proceed with the EEO complaint process.

Since the EEO complaint process and Anti-Harassment Program have different objectives, the outcome of one process has no impact on the other. For example, if an EEO complaint results in a settlement agreement and there is no finding of

⁹ In appropriate cases, however, EEOC may recommend that federal agencies consider disciplining employees who have been found to engage in unlawful harassment.

¹⁰ An allegation may be reported by someone who experienced or observed harassing conduct.

retaliatory harassment or discrimination, this has no bearing on how the allegation would be investigated under the Anti-Harassment Program.

Reporting Harassment and Misconduct Allegations at the Mint

The Mint Diversity Management and Civil Rights (DMCR) Office is responsible for administering the agency's EEO Program Office. DMCR handles the EEO complaint process whereas the Human Capital Directorate (HCD), which is outside of DMCR, has oversight of the Anti-Harassment Program.¹¹ The organizational separation between the EEO complaint process and the Anti-Harassment Program is an EEOC requirement to prevent potential conflicts of the EEO Director acting as the decision-maker for both programs. The decision-maker in the EEO complaint process must decide whether the law was violated, but the Anti-Harassment Program should address issues that may not yet be severe or pervasive enough to violate the law.

Any Mint employee who believes they have experienced or observed incidents of harassment may report the allegation in several ways. These options include promptly reporting the allegation to the following:

- A supervisor or manager (within or outside the employee's chain of command);
- The Anti-Harassment Program Hotline;
- The Anti-Harassment Program Coordinator;
- The local Human Resources Officer (HRO); or
- The local DMCR office

Regardless of the initial reporting method, the Mint's Anti-Harassment Policy¹² requires that all harassment allegations are ultimately reported to the Anti-Harassment Program Coordinator within HCD for tracking and monitoring. The Anti-Harassment Program Coordinator (in conjunction with HCD officials) is also responsible for determining the level of fact-finding inquiry to be conducted that will help identify the severity of the alleged behavior and whether any immediate corrective action is required to protect the alleged victim.

The Mint has two levels of fact-finding inquiries – Management Inquiries and Administrative Investigations. According to the Anti-Harassment Program policy,

¹¹ The Mint began implementing its Anti-Harassment Program in July 2019 following an audit completed in June 2019 by Treasury's Office of Civil Rights and Diversity. The Mint officially issued its updated Anti-Harassment Program policy in January 2021 and subsequently revised it in May 2022.

¹² USM Directive MD 8003.21 (May 2022)

allegations of harassment of limited scope or complexity that may be assessed within the supervisory chain, and do not include allegations of sexual or retaliatory harassment, will be addressed through a Management Inquiry. In contrast, allegations or harassment of greater scope and complexity requiring a more formal and independent assessment, or that include allegations of sexual or retaliatory harassment, will be addressed through an Administrative Investigation. Management Inquiries and Administrative Investigations are also used as fact-finding methods outside of harassment and/or misconduct allegations. For example, Management Inquiries and Administrative Investigations may also be performed when examining reports of potential operational or programmatic deficiencies or other potential system vulnerabilities at the Mint. The concept of multiple levels of fact-finding inquiries is not unusual for anti-harassment programs. According to Treasury guidance¹³ for addressing harassment allegations, “the scope and formality of the inquiry is determined on a case-by-case basis, depending on the nature and complexity of the allegations”; however, we observed that Treasury guidance consistently uses the term “inquiry” to describe the overall fact-finding process, even though the scope of the process may vary.

While Management Inquiries and Administrative Investigations are considered two levels (or types) of fact-finding inquiries, they are governed by two separate policies maintained by different Mint divisions. The Management Inquiry policy¹⁴ is owned by HCD while the Administrative Investigation policy¹⁵ is owned by the Protection Directorate in conjunction with the Office of the Chief Counsel.

During our review, we made several observations about how having two different types of inquiries governed by separate policies affects employees. We observed that having two distinct and independently owned policies has proven to cause confusion amongst the workforce. A cultural assessment of the Mint conducted by TI Verbatim Consulting (TIVC),¹⁶ an independent third party, in September 2021 reported that “participants were confused between the requirement between a Management Inquiry

¹³ Civil Rights and Diversity Issuance System, CRD-009, *Procedures for Addressing Allegations of Discriminatory Harassment*, U.S. Department of the Treasury (February 25, 2021).

¹⁴ USM Policy Memorandum 8001.04, *Management Inquiries* (April 28, 2008).

¹⁵ USM Policy Memorandum 2001.01, *Administrative Investigations* (December 10, 2007).

¹⁶ TIVC is a Certified Service-Disabled Veteran Owned Small Business that is also Minority and Women Owned. It specializes in business and consulting services that include diversity, equity, and inclusion, workplace culture optimization, training and development, and strategic communications.

and Administrative Investigation.”¹⁷ The different terminology used for levels of fact-finding reviews potentially creates the perception that not all allegations may receive the same level of care, especially since “limited scope” (i.e., Management Inquiry) and “greater scope” (i.e., Administrative Investigation) reviews are handled by two completely different Mint divisions. As previously mentioned, HCD has responsibility for the policies governing Management Inquiries and the Protection Directorate in conjunction with the Office of Chief Counsel has responsibility for the policies governing Administrative Investigations. The policies for Management Inquiries and Administrative Investigations have not been updated since 2007 and 2008, respectively, although updates to both policies are currently being drafted, as of August 2022. The cultural assessment final report cited that outdated policies not only signify a “lack of attention,” they also demonstrate that “the organization does not place value in policy impact and presents a significant risk and potential legal burden for the organization.”

As part of our review, we selected a judgmental sample of Management Inquiry and Administrative Investigation final reports to better understand their composition and structure.¹⁸ While we did not evaluate the soundness of the decisions reached or the overall quality of these fact-finding reviews, we noted that there are opportunities to improve the policies governing them to ensure consistency in application. For example, the current Management Inquiry policy includes a table that explains the distinction between a Management Inquiry and an Administrative Investigation. According to that table, an Administrative Investigation should be performed for “issues involving unlawful discrimination or harassment”; however, we found instances where a Management Inquiry was performed for certain allegations involving harassment, racial discrimination, and/or retaliation and other instances where an Administrative Investigation was performed for allegations involving similar issues. While we did not evaluate the quality of these reviews, we saw clear opportunities to update existing policies to more accurately explain how they are currently conducted and the delineation between the two different levels of fact-

¹⁷ TI Verbatim Consulting, Inc. (TIVC), *Culture Assessment Project Report*, Department of the Treasury (DOT) US Mint (September 10, 2021).

¹⁸ Management Inquiry and Administrative Investigation final reports were selected judgmentally from cases identified in the Mint’s Anti-Harassment Program tracking spreadsheet that were reported between November 2019 and February 2022. We judgmentally selected cases that included some allegations that were substantiated and other cases where the allegations were not substantiated. A judgmental sample is a nonprobability sample, the results of which cannot be used to project to the population.

finding reviews. For example, while we observed that the Mint has a process flowchart for the EEO complaint process on its public-facing website, there does not appear to be a comparable flowchart illustrating the Anti-Harassment complaint process and the levels of internal harassment inquiries. We believe that it is important that the policies are updated with Mint employees in mind rather than an administrative management focus. There may be advantages to having one policy for both types of inquiries, or at a minimum some information describing the Anti-Harassment complaint process and the types of internal harassment inquiries.

Tracking of Internal Harassment Allegations at the Mint

According to the EEOC, agencies should utilize a centralized system for tracking and monitoring all inquiries or allegations of harassment. EEOC guidance advises agencies to institute specific guidelines for monitoring allegations and inquiries to support the early identification and effective resolution of conflict situations that could otherwise escalate, if left unchecked. The monitoring of allegations may also support activities that include conducting trend analysis, root cause analysis, and climate assessment to locate "hot spots" of harassment and to obtain feedback on the climate in the workplace.

During our review, we found that tracking of Management Inquiries and Administrative Investigations is a shared responsibility between HCD and the Protection Directorate. This decentralized system is one of the contributing factors that made our review of the universe of reported allegations challenging to perform. Although the official Mint Anti-Harassment Program policy places the responsibility for oversight of harassment and misconduct allegations with HCD, we learned during our interviews with officials from HCD and the Protection Directorate that there may be circumstances where some harassment and misconduct allegations are tracked only by the Protection Directorate. Specifically, we were informed that the complete universe of cases could only be obtained by reviewing and comparing the tracking spreadsheets separately maintained by each unit. We observed that each tracking spreadsheet uses a different template, and the data elements that are tracked are not consistent between the two spreadsheets.

Another factor that presented challenges during our review is that neither tracking system cross-references key demographic information (e.g., race, ethnicity, gender) about the complainant and subject of allegations to the official human resources

system of record. Therefore, the Mint has no system to proactively measure circumstances where a disproportionate number of individuals from a specific demographic group are filing internal complaints or are the subjects of internal complaints in certain locations.

As a result of the challenges described above, we were unable to effectively use the Management Inquiry and Administrative Investigation tracking spreadsheets to perform further aggregate level analysis. To ensure reliable and consistent data was used for our analysis, we decided to focus our complaint analysis on formal EEO complaints¹⁹ based on the certified reports filed with the EEOC via the Treasury Office of Civil Rights & Diversity (OCRD).²⁰ In addition, the EEOC complaints allowed us to identify demographic information based on the type of alleged discrimination claimed (e.g., race, sex).

Analysis of Complaints Received

As part of our review, we examined data on complaints received at the Mint and compared it to those received across the rest of Treasury. Specifically, we obtained the certified formal EEO complaints (EEOC Form 462) data from Treasury OCRD reported for FY2017 to FY2021. We compared the complaint data with workforce numbers contained in the Mint's MD-715 Workforce Data Tables.

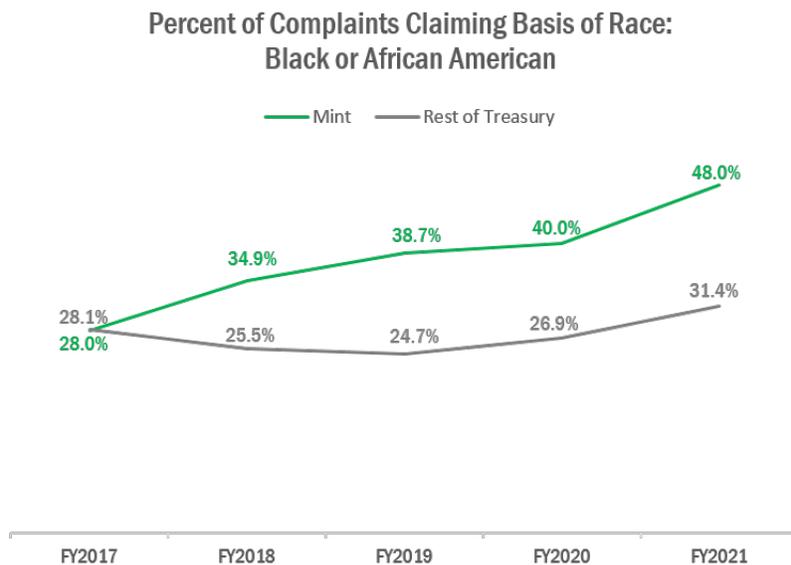
Over the five-year period, Treasury averaged approximately 96,481 employees, of which Mint averaged approximately 1,595 employees (1.7 percent of Treasury employees). As shown in Table 1, from FY2017 to FY2021, Mint employees filed 149 formal EEO complaints. Of those, 56 (37.6 percent) claimed a Basis of "Race:

¹⁹ The EEO complaint process provides individuals the opportunity to seek either a mutual resolution of the alleged discrimination or a decision by a third party on the validity of the claim of discrimination. In the pre-complaint (informal) stage, the aggrieved individual (claimant) makes an initial contact with an EEO Manager to initiate an EEO complaint and an EEO Counselor is then assigned to work with the claimant. The EEO Counselor will offer the claimant the choice between traditional counseling and the Alternative Dispute Resolution (ADR) process for resolving the complaint. If no resolution is achieved through the traditional counseling process or ADR, the counselor will provide the complainant with a Notice of Right to File a Formal Discrimination. Treasury Office of Civil Rights & Diversity (OCRD) will make a determination to accept or reject the formal complaint. If the complaint is accepted for processing, OCRD will assign an investigator to investigate the allegations.

²⁰ EEOC Form 462, Annual Federal Equal Employment Opportunity Statistical Report of Discrimination Complaints

Black or African American.” During the same time period, employees filed 1,709 formal EEO complaints across the rest of Treasury. Of those, 463 (27.1 percent) claimed a Basis of “Race: Black or African American.” In other words, Mint filed 8.0 percent of all complaints filed in Treasury and 10.8 percent of the complaints filed with Basis of “Race: Black or African American.” Further, as shown in Figure 5, from FY2017 to FY2021, the percentage of Mint formal EEO complaints claiming a Basis of “Race: Black or African American” has been increasing at a higher rate compared to the rest of Treasury. In FY2021, 48 percent of all formal EEO complaints filed at the Mint (or 12 of 25 total complaints) claimed a Basis of “Race: Black or African American” compared to 31.4 percent for all other Treasury bureaus (or 91 of 290 total complaints). In FY2017, the percentages were almost equal.²¹

Figure 5: Percent of EEO Formal Complaints Claiming a Basis of Race – Black or African American



²¹ The total number of formal EEO complaints filed at the Mint from FY2017 to FY2021 represents 8 percent of all formal EEO complaints for Treasury. Since the Mint has a smaller universe of formal EEO complaints in comparison to Treasury as a whole, smaller fluctuations in the number of complaints from year to year for the Mint may result in more pronounced percent changes. For example, the number of complaints filed annually on the Basis of “Race: Black or African American,” ranged from 7 to 15 in the period analyzed. Therefore, a thorough interpretation of complaint analysis should consider the number of complaints when percent calculations are presented.

Table 1: Number of EEO Formal Complaints Claiming a Basis of Race – Black or African American (Supports Figure 5 above)

	FY2017	FY2018	FY2019	FY2020	FY2021
Complaints Filed with Basis of Race: Black or African American					
Mint	7	15	12	10	12
Rest of Treasury	96	103	90	83	91
Total Complaints Filed					
Mint	25	43	31	25	25
Rest of Treasury	342	404	364	309	290
% Total Complaints (Basis of Race: Black or African American)					
Mint	28.0%	34.9	38.7%	40.0%	48.0%
Rest of Treasury	28.1%	25.5%	24.7%	26.9%	31.4%

As shown in Figure 6 and Table 2 below, we also examined complaints filed at the Mint with a Basis of Reprisal during the same five-year period. With the exception of FY2018, the majority of formal EEO complaints at the Mint claiming a Basis of Reprisal have been filed by Black or African American employees (or 53 of 84 complaints filed with a Basis of Reprisal over the five-year period). In FY2021, 68.4 percent of all formal EEO complaints claiming a Basis of Reprisal at the Mint (or 13 of 19 complaints) were filed by Black or African American employees.

Figure 6: Percent of EEO Formal Complaints Claiming a Basis of Reprisal that were Filed at the Mint by Black or African American Employees

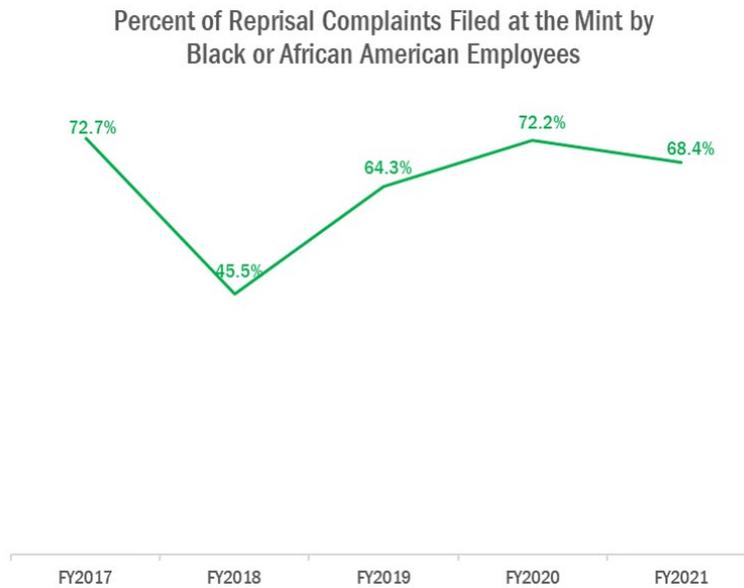


Table 2: Number of EEO Formal Complaints Claiming a Basis of Reprisal that were Filed at the Mint by Black or African American Employees (Supports Figure 6 above)²²

	FY2017	FY2018	FY2019	FY2020	FY2021
Complaints Filed with Basis of Reprisal					
Black or African American	8	10	9	13	13
Total Complaints Filed	11	22	14	18	19
% Black or African American	72.7%	45.5%	64.3%	72.2%	68.4%

²² To identify the ethnicity and race, we analyzed an extract from the EEO database that generates the certified reports. Treasury OCRD then manually queried each complainant in the Human Resources database unless it was otherwise noted in the extract. We observed some small discrepancies when reconciling the case totals to the certified reports. These discrepancies were attributed to the fact that the EEO database may include subsequent updates to EEO cases that were not incorporated in the certified reports and did not materially impact the results of the analysis.

In summary, we made the following observations based on our analysis of the OCRD EEO data:

- A higher percentage of EEO complaints with the basis of race: Black or African American were filed at the Mint when compared to the rest of Treasury;
- Complaints filed with the basis of race: Black or African American at the Mint are increasing at a higher rate than the rest of Treasury; and
- Black or African American employees filed the majority of EEO reprisal complaints at the Mint.

Analysis of the Federal Employee Viewpoint Survey

The OIG reviewed the Mint's results from responses to relevant questions²³ from the annual Federal Employee Viewpoint Survey (FEVS) for FY2017 through FY2021 and compared them with Treasury-wide results. The percentage of Mint respondents that identified Black or African American each year was 21.7 percent, 21.7 percent, 20.6 percent, 22.0 percent, and 19.6 percent for FY2017 to FY2021, respectively. Because individual employee's FEVS responses are anonymous, it is impossible to break down the responses to any given question by race.

In every year, the Mint employees' responses were generally more positive than negative by a large margin and often by percentages similar to those collected Treasury-wide; however, some deviations from this pattern were noted.

For four of the six questions noted, the Mint had fewer positive responses and more negative responses in comparison to all of Treasury. The four questions following this pattern were "I can disclose a suspected violation of law, rule or regulation without fear of reprisal," "Promotions in my work unit are based on merit," "Prohibited

²³ The survey questions changed in FY2020 and three questions were no longer included: (1) Promotions in my work unit are based on merit; (2) Policies and programs promote diversity in the workplace (for example, recruiting minorities and women, training in awareness of diversity issues, mentoring); and (3) Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated.

Personnel Practices (for example, illegally discriminating for or against an employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated," and "My supervisor is committed to a workforce representative of all segments of society."

For the question "Policies and programs promote diversity in the workplace (for example, recruiting minorities and women, training in awareness of diversity issues, mentoring)," the Mint had more negative responses than those of Treasury, however in two of the years (FY2018 and FY2019) they also had more positive responses.

For the question "I recommend my organization as a good place to work," the Mint had more positive responses than those of Treasury, with the exception of FY2021 when they had fewer positive responses than Treasury as a whole.²⁴ For this question the Mint also had fewer negative responses than Treasury for FY2017 to FY2019, but had more negative responses than Treasury for FY2020 and FY2021. See Table 3 below.

²⁴ In 2021, Treasury experienced a drop in the FEVS response rate. This drop in response rate is likely the result of several factors, including (1) Office of Personnel Management's (OPM) decision to survey a sample of the Treasury population, (2) a reduction in the number of weekly survey reminders previously sent out by OPM, (3) a survey period of only 5 weeks, instead of the typical 6, (4) survey fatigue, and (5) on-going impact of the COVID-19 Pandemic.

Table 3: Summary of Select FEVS Responses

	FY 2017			FY 2018			FY 2019			FY 2020			FY 2021		
	# Responses	% Positive Response	% Negative Response	# Responses	% Positive Response	% Negative Response	# Responses	% Positive Response	% Negative Response	# Responses	% Positive Response	% Negative Response	# Responses	% Positive Response	% Negative Response
I can disclose a suspected violation of law, rule, or regulation without fear of reprisal															
Mint	1,028	58.5%	21.4%	921	60.2%	21.3%	909	63.1%	19.7%	781	61.3%	24.0%	460	59.3%	21.7%
Treasury	43,850	67.7%	14.8%	40,001	68.0%	14.8%	39,801	69.1%	14.0%	40,249	72.3%	11.9%	15,240	72.4%	11.8%
Promotions in my work unit are based on merit															
Mint	1,031	31.1%	43.4%	891	37.1%	40.1%	916	35.2%	37.6%	N/A	N/A	N/A	N/A	N/A	N/A
Treasury	42,365	37.1%	34.1%	38,377	36.7%	34.2%	37,936	39.9%	31.7%	N/A	N/A	N/A	N/A	N/A	N/A
Policies and programs promote diversity in the workplace (for example, recruiting minorities and women, training in awareness of diversity issues, mentoring)															
Mint	1,015	57.9%	15.7%	894	62.6%	16.9%	904	60.2%	15.3%	N/A	N/A	N/A	N/A	N/A	N/A
Treasury	41,183	58.3%	14.1%	37,422	58.2%	14.5%	36,851	59.9%	13.2%	N/A	N/A	N/A	N/A	N/A	N/A
I recommend my organization as a good place to work															
Mint	1,062	67.8%	13.2%	941	70.5%	12.4%	940	72.3%	10.7%	794	75.0%	11.4%	474	67.5%	11.7%
Treasury	45,567	64.8%	15.5%	41,424	64.5%	15.9%	40,816	66.9%	14.2%	40,249	74.3%	10.2%	15,710	72.4%	11.6%
Prohibited Personnel Practices (for example, illegally discriminating for or against an employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated															
Mint	983	61.7%	17.5%	890	62.9%	17.8%	879	61.7%	16.3%	N/A	N/A	N/A	N/A	N/A	N/A
Treasury	40,634	69.1%	11.6%	37,010	69.2%	11.9%	36,472	69.3%	11.7%	N/A	N/A	N/A	N/A	N/A	N/A
My supervisor is committed to a workforce representative of all segments of society															
Mint	1,002	65.6%	13.8%	899	68.8%	12.3%	896	69.3%	10.4%	767	76.6%	8.1%	455	78.5%	8.9%
Treasury	41,555	75.1%	7.6%	37,910	75.0%	7.6%	37,310	75.8%	7.1%	37,595	83.0%	5.1%	14,502	83.6%	5.3%

Note: Positive – Strongly Agree and Agree; Very Satisfied and Satisfied; Very Good and Good. Negative – Strongly Disagree and Disagree; Dissatisfied and Very Dissatisfied; Poor and Very Poor

Analysis of Treasury OCRD’s Internal Review of the Mint’s EEO Program

Approximately one year prior to the July 2020 complaint to former Secretary Mnuchin,²⁵ Treasury OCRD completed an audit of the Mint’s EEO, Diversity and Inclusion, and External Civil Rights Programs. Treasury OIG reviewed the final report,²⁶ which concluded that the Mint was compliant with many EEOC requirements and found the EEO Program generally satisfactory. However, Treasury OCRD also reported that there were areas where the Mint was not compliant and identified recommended corrective actions. The report stated that in focus groups and interviews, Mint employees expressed fear of reprisal, confusion about the EEO Office structure and processes, a belief that EEO is biased towards management, and skepticism surrounding the EEO resolution process. The report also stated that other employees and managers believed Mint management was too willing to settle EEO claims and that they failed to take action against employees who filed multiple false complaints. In addition, it was reported that some managers told employees to provide positive responses to certain FEVS questions because a poor response could

²⁵ See Appendix 2 for a timeline of key milestones prior to and following the complaint.

²⁶ Department of the Treasury, Office of Civil Rights and Diversity, U.S. Mint FY2019 EEO, Diversity and Inclusion, and Civil Rights Programs Audit Report (June 20, 2019).

result in the facility losing work. Treasury OIG reviewed the report, paying special attention to the discrepancies found relating to the quality of EEO counseling and the complaint process. Findings included:

- issues with access to information on how to file an EEO complaint or about the Anti-Harassment Policy and Procedures;
- a lack of a comprehensive Anti-Harassment Program policy;
- confusion as to which department has ownership of the Anti-Harassment Program and who is the Anti-Harassment Coordinator;
- lack of an EEO Strategic Plan, recognized by EEOC as a best practice;
- lack of a policy requiring that inquiries into harassment allegations be initiated within 10 days of the reported allegation;
- lack of an adequate tracking system to determine timely initiation of inquiries into harassment allegations;
- lack of an out-briefing of all parties following a harassment inquiry;
- lack of anti-harassment training for employees and managers;
- lack of a disciplinary policy or a table of penalties that covers discriminatory conduct;
- issues with the quality control process for EEO complaint documents;
- improper record retention procedures;
- a lower than Treasury average for EEOC Alternative Dispute Resolution (ADR) offer rate; and
- issues with ensuring that the Ethnicity and Race Indicator (ERI) and gender for new employees who do not self-identify during the onboarding process is accurately captured.

Even though the Mint officially responded to the recommendations to the Treasury OCRD audit report in September 2020, it began the process of taking a number of corrective actions almost immediately after it was issued in June 2019. For example, an Anti-Harassment Program coordinator was named in July 2019 and assumed the position in November 2019. At that time, the Anti-Harassment complaint tracking system was implemented. The Mint also developed and implemented a checklist in July 2019 to ensure that all EEO complaint documents uploaded into the EEO complaint management system are accurate and complete.

Analysis of Federal Mediation and Conciliation Service Conflict Assessment of Mint Protection Directorate

In May 2020, approximately two months prior to the July 2020 complaint, the Federal Mediation and Conciliation Service (FMCS) completed a Conflict Assessment²⁷ of the Mint Police Field Unit in Washington, D.C. The assessment was requested by the Deputy Chief of the Protection Division, which oversees the Mint Police. FMCS facilitators conducted interviews to gain insight into what works well for the unit, what challenges they face, and what recommendations could be made to improve the climate in the workplace. The primary findings were: (1) poor communication flow about mission, goals, and day to day operations; (2) lack of trust between staff and management; and, (3) lack of self-awareness and accountability. FMCS made a number of recommendations that included creating a collaborative working group to address communication gaps, employee morale, and effective training, and offering focused leadership development training emphasizing employee engagement and improving communication.

Office of Investigations Interviews and Records Review

Treasury OIG's Office of Investigations (OI) interviewed five of the six complainants, who signed the letter to the former Secretary of the Treasury; one complainant had the opportunity to be interviewed but did not accept. OI also spoke with 12 current and former Mint personnel, referred to OI by the five interviewed complainants. The individuals discussed their perceptions and experiences about the Mint, including alleged retaliation after filing complaints against the Mint or their managers. Thirteen (13) of the 17 interviewed advised they were harassed by supervisors after they complained, and four became subjects of investigations after they filed a complaint. Allegations of misconduct were substantiated for two of the four individuals who became the subject of investigations.

To broaden the scope of interviews, OI contacted the Union Representatives at all six of the Mint locations to inquire if they were aware of any relevant cases involving union members. OI spoke with representatives in San Francisco, Denver, and Philadelphia; no one recalled any cases related to harassment or retaliation. Numerous attempts to contact the Union Representatives from West Point, Fort Knox, and Headquarters were unsuccessful; no one responded to OI's calls or emails.

²⁷ Federal Mediation and Conciliation Service, Conflict Assessment: US Mint Police, DC Field Unit (May 5, 2020).

The OIG reviewed allegations referenced by the complainants in the letter to the former Secretary, in listening sessions, and during interviews. The complaints mentioned were received by the OIG between 2015 and 2020. Four out of the five complaints referenced occurred prior to former Director Ryder's arrival in 2018.

- A 2015 investigation involving racist writings on a bathroom wall was investigated and referred to the Federal Bureau of Investigation and the United States Attorney's Office, Civil Rights Division. Due to the lack of evidence to identify a subject, the matter was declined for prosecution.
- A 2017 investigation related to a noose found at a Mint facility, was substantiated, and the subject was removed.
- The OIG attempted to investigate the receipt of a racially motivated, threatening letter in 2020; however, the complainant/victim became combative, refused to cooperate with the investigation, and subsequently withdrew the complaint. No determination could be made about this allegation due to the failure of the complainant to cooperate.
- A 2015-2016 investigation comprised 14 allegations, 4 of which were substantiated (unauthorized search and storage of agency email and personally identifiable information (PII), and failure to adhere to Personal Use of Government Technology resources).
- A 2017 investigation, alleging unauthorized use of the complainant's resume for the benefit of another party, was unsubstantiated.

OI identified factors that could exacerbate perceptions of disparity. Since investigations contain protected information and Mint management has an obligation to protect adverse action and settlement information, all parties are not privy to all the facts surrounding an investigation or Mint management's response to an investigation, resulting in potentially inaccurate assumptions by the complainants. Our review also identified a significant leak and unauthorized sharing of privileged personnel information related to internal Mint Management Inquiries, Administrative Investigations, and EEO or MSPB settlement information that was circulated among certain Mint personnel, including some of the complainants.

During four investigations, two of the complainants exhibited lack of candor, which hindered the investigations and undermined the allegations.

Mint Management has taken steps to Improve Diversity, Equity, Inclusion and Accessibility

Mint Management has taken a number of steps to address the concerns set forth in the July 2020 complaint. In an interview with Treasury OIG, former Mint Director David Ryder said he took every complaint of racism seriously. In the weeks following the complaint, he personally met with the individuals who signed the letter and invited them to attend a series of listening sessions²⁸ with Mint and Treasury officials responsible for diversity, equity, inclusion, and accessibility. He also took steps to commission the TIVC cultural assessment, implement additional EEO training for all supervisors and managers, and require all Mint employees to complete diversity and inclusion training and anti-harassment training.

Regarding the TIVC cultural assessment, the Mint contracted with TIVC to perform a comprehensive cultural assessment of the Mint Headquarters and Fort Knox locations focusing on “cultural behaviors, opinions, beliefs, views, feelings, values, and practices to determine business needs and appropriate actions.” The assessment, which was performed between March 2021 and September 2021, included but was not limited to, reviews of processes and policies, focus groups, surveys, and interviews with management, key personnel, and non-supervisory employees. Root-cause analysis performed during the assessment found that “diversity, equity, inclusion, and race relations are a widespread issue and not relegated to just a few ‘disgruntled people with an ax to grind.’” The assessment also reported that the disagreement on the state of race relations and treatment of minorities is a shared perception across demographics.

According to the final report containing the strategic action plan,²⁹ contributing factors to the state of Mint’s culture included “a lack of updated policies, conflicting and polarized views on Diversity, Equity, & Inclusion, race and gender relations, and the perception of inconsistent application of policies.” Another major concern

²⁸ According to the complainants that Treasury OIG interviewed, several of them only attended the first of three listening sessions because they believed that Director Ryder was being dismissive of their concerns and insensitive to how Black or African American Mint employees felt about current and prior racial incidents.

²⁹ TIVC published two reports as part of the cultural assessment review. The first report, Culture Assessment Project Report, was provided to the Mint on September 10, 2021. The second report, Culture Assessment Strategic Action Plan, was provided on September 29, 2021. The Culture Assessment Strategic Action Plan included detailed recommendations and proposed implementation methodologies to address the findings discussed in the Culture Assessment Project Report.

expressed in the cultural assessment was the lack of psychological safety. In particular, the report stated that a “statistically significant number of participants across demographics conveyed fear of retaliation and fear of reprisal as the main reason for refusing to participate in focus groups or interviews. Seven percent of participants cited ongoing or previously filed grievances that resulted in retaliatory administrative investigations as the reason to decline focus group participation. This perceived lack of trust persisted and appeared to be present during focus groups, one-on-one interviews, and in the survey data.”

In response to the cultural assessment, the Mint created a culture steering committee under the leadership of the current Mint Director, Ventris Gibson, to oversee the planning and implementation of proposed strategic action plan items that prioritize culture optimization. As of August 2022, the Mint had taken a number of actions including the following:

- Created the Office of Equity and Inclusion (OEI) to be led by the newly appointed Chief Equity and Inclusion Officer (CEIO). Currently, position descriptions are being developed and recruitment will be underway for mission-critical positions necessary to carry out Diversity, Equity, Inclusion, and Accessibility (DEIA) efforts at the Mint.
- Added new performance plan requirements for all employees on workplace requirements as part of employee engagement. DEIA elements are currently being drafted for FY2023 Performance Management Plans for all Mint employees with an estimated completion date prior to October 1, 2022.
- Provided training and coaching for managers and supervisors focused on equity. A contractor conducted psychological safety and change management training for Mint Headquarters and Fort Knox managers and supervisors in May 2022.
- Appointed a diversity expert in May 2022 to assist in the development of the Mint’s strategic action plan for culture optimization and to help ensure that the Mint is on the appropriate implementation path.
- Held listening sessions with Mint staff. The Mint Director and CEIO visited each of the Mint facilities in the field (Philadelphia, San Francisco, Denver, West Point, and Fort Knox) and each directorate in Mint Headquarters to meet with employees and share their thoughts and experiences.

- Continued to address all remaining outstanding recommendations from the June 2019 Treasury OCRD audit report of the Mint’s EEO, Diversity and Inclusion, and External Civil Rights Programs and the May 2020 FMCS Conflict Assessment of the Mint Police Washington, D.C. Field Unit.
- Assigned Anti-Retaliation training to all managers and employees. This training was assigned in February 2022. As of August 2022, 98 percent of the Mint workforce has completed it.
- Began taking steps to reinstitute the Aspiring Leaders Development Program³⁰ and create a career path framework with mentoring capability. Mint leadership is currently evaluating the Aspiring Leaders Program for incorporation into FY2023 sessions and researching options for a career path framework with mentoring capability. According to Mint officials, they are in the process of selecting a contractor for an online mentoring program for Mint employees for potential roll out during FY2023.
- Began drafting updates to policies governing Management Inquiries and Administrative Investigations.

Recommendations

We recommend that Mint leadership:

1. Proactively evaluate patterns and trends in Administrative Investigations, Management Inquiries, and EEO complaints as it pertains to demographic characteristics including, but not necessarily limited to, race and ethnicity. To facilitate this type of analysis, the data collection process for Administrative Investigations and Management Inquiries should be improved to ensure the capture of necessary information and to ensure consistency of data collected

³⁰ The Aspiring Leaders Development Program (ALDP) is the Mint’s leadership development program. The ALDP provides participants with knowledge, skills and tools to support their professional development. The ALDP focuses on engaging participants in a fundamental examination of their own leader identity, leadership competencies, and learning strategies. The learning outcomes are for participants to: (1) establish/develop their leader identity, (2) analyze their leadership styles and leader competencies for future professional growth, and (3) implement a personal employee/leader development strategy. The fall cohort for the ALDP begins on October 10, 2022.

across the programs. These enhancements will help ensure information is tracked, monitored, and analyzed at a consolidated level.

2. Enhance efforts to proactively evaluate patterns and trends in Mint workforce statistics such as hiring and promotion practices as it pertains to demographic characteristics including, but not necessarily limited to, race and ethnicity. As part of this proactive evaluation, steps should be taken to identify potential adverse trends, understand why they exist, and review whether there are opportunities to address them.
3. Ensure that the Mint workforce has the proper policies, resources, and tools to aid employee understanding of how to file complaints pertaining to harassment, employee misconduct, and potential deficiencies and/or vulnerabilities in Mint operations, programs, and/or systems. This also pertains to ensuring that policies for Management Inquiries and Administrative Investigations are clearly written so that employees understand the distinction between the two processes. To ensure that efforts are effective, consideration should be given to conducting surveys and/or other forms of outreach among the workforce as it pertains to the complaint process.

We plan to follow up on the Mint's progress in implementing corrective actions in response to our recommendations as well as the reports issued by TIVC, OCRD, and FMCS. We will work with Mint management on the timing of our follow-up review.

We appreciate the cooperation of the Mint and OCRD personnel during our inquiry, and look forward to continued collaboration to monitor developments. We are available to discuss our findings, processes, and recommendations. Please call me on (202) 528-8997.

Appendix 1: Objective, Scope, and Methodology

The Office of Inspector General (OIG) initiated a review of workforce diversity and personnel practices at the Mint to determine whether:

- There are patterns or practices of racial discrimination, including but not limited to intimidation or disproportionate and meritless investigatory actions; and
- The quality of the Equal Employment Opportunity (EEO) and other complaint processes are satisfactory.

To accomplish our objective, we conducted fieldwork from October 2020 through September 2022. As part of our fieldwork, we interviewed the following key Mint officials and staff:

- Director, Mint
- Former Director, Mint
- Chief Equity and Inclusion Officer, Office of Equity and Inclusion
- EEO Officer, Diversity Management and Civil Rights (DMCR) Directorate
- Acting EEO Officer, DMCR
- Director, Human Capital Directorate (HCD)
- Anti-Harassment Program Coordinator, HCD
- Chief Counsel
- Deputy Chief Counsel
- Commander, Protection Directorate
- Inspector, Investigation and Intelligence, Protection Directorate

We also interviewed:

- five of the six complainants who signed the letter to the Secretary of the Treasury (One complainant had the opportunity to be interviewed but did not accept the opportunity);
- twelve current and former Mint personnel the five complainants referred to the OIG for interviews;
- union representatives from Mint locations in San Francisco, Denver and Philadelphia (Numerous attempts to contact the union representatives from West Point, Fort Knox and Headquarters were unsuccessful); and
- Officials from the Treasury Office of Civil Rights and Diversity

We reviewed and analyzed the Mint's policies and procedures related to Management Inquiries, Administrative Investigations, and the agency's Anti-Harassment program. We also reviewed government-wide, Treasury, and system guidance including:

- EEOC, Management Directive 715 (EEO MD-715), Federal responsibilities under Section 717 of Title VII and Section 501 of the Rehabilitation Act (Oct. 1, 2003);
- EEOC, Instructions to Federal Agencies for EEO MD-715, Part G, Agency Self-Assessment Checklist;
- EEOC, Model EEO Programs Must Have An Effective Anti-Harassment Program (2006);
- EEOC, Form 462, Annual Federal Equal Employment Opportunity Statistical Report of Discrimination Complaints, Form Completion Instruction Manual (2021)
- Civil Rights and Diversity Issuance System, CRD-009, Procedures for Addressing Allegations of Discriminatory Harassment, U.S. Department of the Treasury (Feb. 25, 2021);
- Mint Directive MD 8003.21, Anti-Harassment Program (May 2022);
- Mint Directive MD 8003.21, Anti-Harassment Program (Jan. 2021);
- Mint Policy Memorandum 8001.04, Management Inquiries (Apr. 28, 2008);
- Mint Policy Memorandum 2001.01, Administrative Investigations (Dec.10, 2007); and
- icomplaints EEO Case Management User Guide, MicroPact, Inc. (MicroPact's icomplaints is an enterprise level Commercial Off-The-Shelf product used for tracking EEO complaints and cases)

We obtained data from the following sources to facilitate analysis related to our review:

- EEOC Form 462, Annual Federal Equal Employment Opportunity Statistical Report of Discrimination Complaints, Fiscal Years 2017-2021, Mint and Treasury-wide;
- MD-715 Workforce Data Table A1: Total Workforce Distribution by Race, Ethnicity, and Sex, Fiscal Years 2017-2021, Mint, BEP, and Treasury-wide;
- MD-715 Workforce Data Table A4-1: Senior Pay & General Schedule (GS) Grades - Distribution by Race, Ethnicity, and Sex (Across), Fiscal Years 2017-2021, Mint, BEP, and Treasury-wide;
- MD-715 Workforce Data Table A4WG-1(All): Participation Rates Across Wage Grades, Fiscal Years 2017-2021, Mint, BEP, and Treasury-wide;

- Mint iComplaints data for Formal and Informal EEOC Complaints, Fiscal Years 2017-2021;
- HR Connect Ethnicity and Race Indicator (ERI) for Mint EEO Formal Complaints Claiming a Basis of Reprisal for Fiscal Years 2017-2021;
- Mint Anti-Harassment Program Tracking Report, November 2019 through February 2022;
- Judgmental sample of Management Inquiry and Administrative Investigation final reports selected from the Mint Anti-Harassment Program Tracking Report (We judgmentally selected cases that included some allegations that were substantiated and other cases where the allegations were not substantiated. A judgmental sample is a nonprobability sample, the results of which cannot be used to project to the population.);
- Monthly complaint case logs provided to Mint Deputy Chief Counsel from the Anti-Harassment Program Coordinator and the Protection Directorate; and
- Federal Employee Viewpoint Survey, 1st Level Subagency Report, Department of the Treasury: Mint, United States Office of Personnel Management, Fiscal Years 2017-2021;

We also reviewed the following reports and documentation related to Mint activities:

- EEOC Form 715-02, Part A – D, Federal Agency Annual EEO Program Status Report, Mint, Fiscal Years 2017-2021;
- Department of the Treasury, Office of Civil Rights and Diversity, U.S. Mint FY2019 EEO, Diversity and Inclusion, and Civil Rights Programs Audit Report (Jun. 20, 2019);
- Federal Mediation and Conciliation Service, Conflict Assessment: US Mint Police, DC Field Unit (May 5, 2020);
- TI Verbatim Consulting, Inc. (TIVC), Culture Assessment Project Report, Department of the Treasury (DOT) US Mint (Sep. 10, 2021);
- TIVC, Culture Assessment Strategic Action Plan, DOT US Mint (Sep. 29, 2021);
- InfoMINT Newsletter, Mint (Summer 2022);
- A Blueprint for Change Update, Diversity, Equity, Inclusion and Accessibility, Mint (Aug. 2022);
- Status of Mint Actions in Response to Cultural Assessment, Mint (Aug. 12, 2022); and
- Mint Office of Equity and Inclusion Organization Chart and Position Descriptions

Appendix 2

Mint Timeline of Key Milestones

