

## Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

### Section I: Efforts to Reach Regulatory Goals

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

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

- |                                |        |    |
|--------------------------------|--------|----|
| a. Cluster GS-1 to GS-10 (PWD) | Answer | No |
| b. Cluster GS-11 to SES (PWD)  | Answer | No |

GSA is fully compliant in this measure.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

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

- |                                 |        |    |
|---------------------------------|--------|----|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer | No |
| b. Cluster GS-11 to SES (PWTD)  | Answer | No |

GSA is fully compliant in this measure.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	671	202	30.10	43	6.41
Grades GS-11 to SES	10710	2181	20.36	287	2.68

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

All managers and supervisors take a complement of required courses when they become new supervisors, and the hiring goals related to disability are in reference material thereafter. Additionally, all senior executives are briefed at least annually on agency status, progress, and obligations relating to MD-715, including participation goals for PWD and PWTD. Furthermore, the Deputy Chief Human Capital Officer for the agency is also the executive sponsor of the PWD Special Emphasis Program.

### Section II: Model Disability Program

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

**A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM**

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

Answer No

Key programs and activities were unable to effectively support the disability program in FY21, in part due to insufficient qualified staffing during the first part of the fiscal year. During FY21, GSA hired a new Reasonable Accommodations Coordinator, appointed two co-Special Emphasis Program Managers for the People with Disabilities Special Emphasis Program, and hired a new Affirmative Employment Program Manager. Staffing of the Selective Placement Program (SPP) and Disabled Veterans Affirmative Action Program (DVAAP) were insufficient in FY21 to effectively execute either program (a diversity, equity, inclusion, and accessibility program manager (DEIA PM) was subsequently hired in FY22 and will also serve as SPP Coordinator and DVAAP Manager). The agency did not take specific steps in FY21 to implement relevant aspects of the GSA Affirmative Action Plan for PWD (e.g., recruitment, hiring, advancement, or retention of PWD). Schedule A(u) hires are not currently managed to ensure correct disability status records or to track conversion of eligible candidates after completion of their respective two-year probationary periods. The agency is currently unable to coordinate use of either data from appointment authorities that take disability into account or data from requests for reasonable accommodations to correct inaccurate disability status information. Schedule A(u) hires are able to self-identify incorrect disability status codes. Improvements to these identified shortfalls are addressed in multiple Part H corrective plans.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	0	0	1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Processing reasonable accommodation requests from applicants and employees	20	0	0	Emily Claybrook Reasonable Accommodation Coordinator emily.plank@gsa.gov
Section 508 Compliance	0	0	23	Chuck Popelka/Daniel Perkins Section 508 Deputy/ Program Manager charles.popelka@gsa.gov; dan.perkins@gsa.gov
Architectural Barriers Act Compliance	0	0	2	Michael Foegelle National Accessibility Officer michael.foegelle@gsa.gov
Special Emphasis Program for PWD and PWTD	0	0	3	John Bagwell/ Hayden Shock Special Placement Program Coordinator john.bagwell@gsa.gov/ hayden.shock@gsa.gov

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

Answer No

All staff members with disability-related responsibilities are required to receive annual training within their respective specialties (e.g., Human Resources, Information Technology, Facilities Management); however, training and/or resources may be insufficient, as evidenced by deficiencies identified in Part G of this report and further described in Part H. Improvements related to this potential shortfall are addressed in multiple Part H corrective plans.

**B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

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

Answer No

Funding and/or other resources may be insufficient, as evidenced by deficiencies identified in Part G of this report and further described in Part H. Improvements related to this potential shortfall are addressed in multiple Part H corrective plans

**Section III: Program Deficiencies In The Disability Program**

<b>Brief Description of Program Deficiency</b>	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]		
<b>Objective</b>	Improve the reasonable accommodations program. Provide sufficient funding, qualified staffing, and an effective, accurate data system to enable consistently timely processing of requests for reasonable accommodations and to provide accurate and complete data required to support annual assessments, trigger identification, and barrier analyses. Improve the reasonable accommodations data system by adding relevant measures of effectiveness identified in MD-715 Part J.		
<b>Target Date</b>	Sep 30, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 23, 2022		Make relevant changes to reasonable accommodations processing procedures to elevate visibility of requests that are approaching or have exceeded the established deadline, with goals of providing enhanced oversight, reducing processing times, identifying and tracking root causes for processing delays, and enabling iterative improvements through tracking of lessons learned and application of best practices
	Sep 30, 2022		Research all requests for reasonable accommodation that were untimely processed in FY20 and FY21, in order to identify root causes and contributing factors, and develop and implement appropriate corrective and preventative measures
	Sep 30, 2022		Collaborate with the AEPM, who will assist to identify, develop, and incorporate improvements to the reasonable accommodations data system to (a) improve data accuracy and completeness, (b) flag requests that are approaching established deadlines (i.e., before they become non-compliant) and requests that have exceeded established processing requirements, (c) automate calculations, (d) support trigger identification, (e) support barrier analysis, and (f) identify timeframes for implementation.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
<b>Objective</b>	Improve the reasonable accommodations program. Provide sufficient funding, qualified staffing, and an effective, accurate data system to enable consistently timely processing of requests for reasonable accommodations and to provide accurate and complete data required to support annual assessments, trigger identification, and barrier analyses.		
<b>Target Date</b>	Sep 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2022		Resolution of this deficiency is addressed in Part H plan H.9 (Part G B.4.a.10)
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
<b>Objective</b>	Develop and implement regular collaborative meetings and objectives relating to each of the four major focus areas of the Affirmative Action Plan (AAP) for Persons with Disabilities (PWD) (i.e., (1) recruitment, (2) hiring, (3) advancement, and (4) retention of PWD), as well as collaborative meetings to coordinate efforts with HR recruitment programs (e.g., Federal Equal Opportunity Recruitment Program (FEORP), Selective Placement Program (SPP), and DVAAP).		
<b>Target Date</b>	Jul 29, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jun 30, 2022		Establish and conduct meetings, no less than quarterly, between the AEPM, FEORP Manager, SPP Coordinator, and DVAAP Manager to coordinate program activities; review plans, status, and progress; and to identify areas of potential collaboration.
	Jun 30, 2022		Identify relevant HR subject matter experts (SMEs) for each of the four AAP focus areas and establish regular meetings between the HR SMEs, PWD Special Emphasis Program Co-Managers (SEPMs), DEIA Program Manager, and the Affirmative Employment Program Manager, no less than quarterly, to collaborate on generating plans; identifying resources/requirements; tracking progress toward attainment of AAP requirements and goals; and fulfilling MD-715, FEORP, and DVAAP reporting requirements.
	Jul 29, 2022		Establish agency participation goals for PWD and persons with targeted disabilities (PWTD). Consider setting an initial goal 50% higher than the federal goals of 12% for PWD and 2% for PWTD within both low- and high-grade level clusters (i.e., GSA goals of 18% for PWD and 3% for PWTD).
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
<b>Objective</b>	Modify exit survey to add disability-specific questions as described in EEOC’s revised Part G checklist.		
<b>Target Date</b>	Jul 1, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 1, 2019 Sep 30, 2021	May 24, 2021	Develop revised exit survey questions that address requirements in EEOC’s revised Part G checklist. OHRM to review proposed exit survey questions, incorporate them into the GSA Exit Survey, and disseminate the new survey (e.g., update links, etc.). To be accomplished via a new platform contract to be in place by FY23.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	In April, 2021, the Office of Civil Rights reviewed the GSA Exit Survey for compliance, identified areas of deficiency, and developed seven relevant questions to be included in the next survey revision. Additionally, the Office of Civil Rights developed and included business rules to govern the survey format, response options, and processing of EEO-related questions. The revised questions were forwarded to the Office of Human Resources Management on May 24, 2021; however, no changes were made to the exit survey.	

<b>Brief Description of Program Deficiency</b>	D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]		
<b>Objective</b>	Take specific steps to ensure qualified PWD/PWTD are aware of and are encouraged to apply for job vacancies.		
<b>Target Date</b>	Jul 29, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 29, 2022		Resolution of this deficiency is addressed in the plan for Part G measure C.4.e.1.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]		
<b>Objective</b>	Establish agency-specific participation goals for PWD and PWTD. Consider setting an initial goal 50% higher than the federal goals of 12% for PWD and 2% for PWTD within both low- and high-grade level clusters (i.e., GSA goals of 18% for PWD and 3% for PWTD).		
<b>Target Date</b>	Jul 29, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 29, 2022		Resolution of this deficiency is addressed in the Part H plan for Part G measure C.4.e.1.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	PWD participation was improved in FY21 by manually reclassifying relevant employees as PWD (outside the HR Links employee data system of record) using criteria associated with “hiring authorities that take disability into account.” That effort further increased the number of GSA employees identified as PWD by more than 80% (PWTD figures were not affected).	
	2021	GSA identified and corrected records of 93 PWTD who had outdated OPM disability codes that were disestablished in 2017. Because the old codes were no longer recognized, those employees were not accounted for as either PWD or PWTD in any analyses or reports during FY18, FY19, or FY20. Resolution of this issue increased the number of PWD by 8% and number of PWTD by 40%.	

<b>Brief Description of Program Deficiency</b>	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		
<b>Objective</b>	Improve the reasonable accommodations data system.		
<b>Target Date</b>	Sep 30, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2022		Resolution of this deficiency is addressed by the Part H plan for Part G measure B.4.a.10.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

## Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

### A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

GSA utilizes OPM’s Shared Register of Candidates with Disabilities and the Workforce Recruitment Program (WRP); however, there were no agency-level efforts conducted in FY21 targeting recruitment of either PWD or PWTD.

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

There were no agency-level efforts conducted in FY21 targeting recruitment of PWD or PWTD. Schedule A(u) appointment authority and other hiring authorities that take disability into account are included as hiring mechanisms in job announcements; however, they are widely not used as targeted recruitment tool.

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

Applicants who apply under Schedule A(u) via USAJOBS have eligibility determined via the same evaluation process as other candidates; however, they are placed on a separate certificate for hiring managers' consideration.

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

Answer No

Managers and supervisors are required take a complement of courses when they become new supervisors; however, compliance and/or effectiveness of that training may be insufficient, as evidenced by hiring-related issues identified in FY21 relating to data that appears inaccurate and/or inconsistent with regulations. Neither training content nor compliance rates were assessed in FY21; however, further investigations into these issues, as well as planned improvements, are addressed in multiple Part H corrective plans.

**B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

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

The GSA National Recruitment Center maintains regularly updated lists of candidate sourcing options that include PWD-focused groups and organizations (identified by both region or occupation) as well as PWD-focused contacts within schools and universities (e.g., disability services directors, disability resource directors, and disability support offices). Separately, in FY21, GSA conducted internal outreach to improve centralized awareness of various agency-level and subcomponent affinity groups, including groups associated with PWD directly or indirectly (e.g., disabled veterans). Part of that effort included capturing information on affinity group contacts and engagements with external entities.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

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

- a. New Hires for Permanent Workforce (PWD) Answer No
- b. New Hires for Permanent Workforce (PWTD) Answer No

No triggers exist in this measurement area.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	30674	19.05	0.02	8.96	0.01

% of Qualified Applicants	24670	18.40	0.02	8.62	0.01
% of New Hires	169	22.49	0.00	11.83	0.00

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

The following mission critical occupational series have lower participation of PWD among new hires, compared to the participation rate among qualified applicants: 0201, 0301, 0501, 0560, 0905, 1170, and 2210. The following mission critical occupational series have lower participation of PWTD among new hires, compared to the participation rate among qualified applicants: 0201, 0501, 0560, 0905, and 2210.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0201 HUMAN RESOURCES MANAGERS	5	40.00	0.00
0301 MISC PROGRAM AND ADMINISTRATION	16	12.50	12.50
0343 MANAGEMENT AND PROGRAM ANALYSTS	27	33.33	14.81
0501 FINANCIAL MANAGEMENT ANALYST	4	25.00	0.00
0560 BUDGET ANALYST	1	0.00	0.00
0905 GENERAL ATTORNEY	1	0.00	0.00
1101 GENERAL BUSINESS AND INDUSTRY	33	24.24	12.12
1102 CONTRACTING	64	23.44	14.06
1170 REALTY	11	9.09	9.09
2210 INFORMATION TECHNOLOGY SPECIALIST	6	0.00	0.00

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Qualified Applicants for MCO (PWD) Answer Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

The mission critical occupational series 0560 had a lower participation rate of PWD among qualified applicants, compared to the participation rate among the relevant applicant pool. Series 0905 could not be assessed, as there were no internal competitive promotions. Overall, assessment of internal competitive promotions was negatively impacted by very low rates of self-identification (13% for mission critical occupations). The mission critical occupational series 0501 and 0560 have lower participation rates of PWTD among qualified applicants, compared to their participation rates among the relevant applicant pool. Series 0905 could not be assessed, as there were no internal competitive promotions. Overall, assessment of internal competitive promotions was negatively impacted by very low rates of self-identification (13% for mission critical occupations).



4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Promotions for MCO (PWD) Answer Yes
- b. Promotions for MCO (PWTD) Answer Yes

The mission critical occupational series 0343 and 1102 have lower participation rates of PWD among promoted employees, compared to their participation rates among qualified applicants. Series 0905 could not be assessed, as there were no internal competitive promotions. Overall, assessment of internal competitive promotions was negatively impacted by very low rates of self-identification (13% for mission critical occupations). The mission critical occupational series 0343, 1101, 1102, 1170, and 2210 have lower participation rates of PWTD among promoted employees, compared to their participation rates among qualified applicants. Series 0905 could not be assessed, as there were no internal competitive promotions. Overall, assessment of internal competitive promotions was negatively impacted by very low rates of self-identification (13% for mission critical occupations).

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

### A. ADVANCEMENT PROGRAM PLAN

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

GSA provides career development opportunities for all eligible employees (not just PWD) through various Competitive Development Programs (CDPs). To develop the mandatory MD-715 data tables, eleven FY21 programs were consolidated by grade level eligibility into the seven categories tracked by MD-715 (e.g., GS-13, GS-14, GS-15, and SES; as well as Supervisors, Managers, and Executives). That analysis showed consistently low participation rates of PWD among CDP nominees, relative to their respective CDP eligible feeder pools. Improving advancement opportunities for PWD is being addressed within Part H corrective plans.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

GSA provides career development opportunities for all eligible employees (not just PWD) through various CDPs. The specific CDPs vary from year to year (with six offered in FY19, seven offered in FY20, and eleven offered in FY21). The FY21 CDPs included (1) eCornell – Leadership Essentials, (2) Eisenhower School National Defense University, (3) Federal Executive Institute (FEI) Leadership for a Democratic Society, (4) Graduate School USA Executive Leadership Program, (5) Graduate School USA Executive Potential Program, (6) Harvard Kennedy School: Senior Executive Fellows Program, (7) OPM President’s Management Council Interagency Rotation Program, (8) Partnership for Public Service – Foundations in Public Service Leadership Program, (9) Partnership for Public Service – Excellence in Government Fellows Program, (10) Partnership for Public Service – Leadership Excellence in Acquisition Program, and (11) Partnership for Public Service – Preparing to Lead. The programs have different eligibility criteria, focus areas, and develop different competencies, up to and including Senior Executive Service candidate development. In addition to the agency-level CDPs, GSA also maintains the following other offerings: (1) GSA Start Program, (2) Targeted Leadership Development Program, (3) Mentoring Program, (4) Coaching services, and (5) Enterprise Emerging Leaders Program. In FY21, GSA also launched a Mid-Career Leadership Development Pilot Program. GSA’s Mentoring Program establishes professional relationships in which an experienced person (the mentor) supports and encourages employees to develop specific skills and knowledge that will maximize their business potential and improve their performance. The program includes a Resource Library, virtual training through GSA’s Online University, self-assessments, tips, templates, and videos. In addition to managing the agency-level program, the Mentoring Program also helps subordinate organizations to create Mentoring Pilots,

connects employees with Regional Mentoring Programs, and provides Mentoring Essentials training for new employees. Additionally, GSA’s Phased Retirement Guidelines and Procedures (HRM 9900.1) contain a requirement for a phased retiree to spend at least 20 percent of his/her working hours mentoring. The Enterprise Emerging Leaders Program (EELP) is a two-year development program that provides entry level talent (recently hired GS7-GS9 employees on a career ladder promotion track to GS12) with rotational opportunities, core technical and professional leadership training, and mentoring to ensure that new hires gain the knowledge, skills, and abilities required to successfully perform in mission critical positions across the agency. The program gives employees a strong foundation for their careers, making them well-rounded employees, capable of serving the agency in a wide range of offices. The purpose of the EELP is to provide the necessary training, experiences, and support to selected entry level employees so that, upon completion of the program, they are prepared for permanent placement in a GSA office. The GSA Start Program is an enterprise-wide developmental training curriculum for new, entry-level employees in grades GS7 through GS11 and in various occupational series. The virtual, one-year training provides new employees with professional development training focused on core competencies and offers additional learning opportunities. The GSA Start Program supports new employees in building foundational GSA business knowledge, essential professional skills, and developing relationships during the training and beyond. Core competencies include Communication Skills, Conflict Management, Continual Learning, Influencing-Negotiating, Integrity-Honesty, Interpersonal Skills, Problem Solving, Public Service Motivation, and Team Building. At the individual level, every GSA employee is afforded the opportunity to complete Individual Development Plans (IDPs), which are guides to help employees reach career goals within the context of organizational objectives. IDPs are developmental "action" plans to move employees from where they are to where they want to be, and to provide the systematic steps to improve in areas that are not strengths and to build on strengths as individuals improve job performance and pursue career goals. IDPs serve many potential objectives, including learning new skills and competencies to improve current job performance; maximizing current performance in support of organizational requirements; assisting employees in reaching career development goals; increasing interest, challenge, and satisfaction in current positions; and/or obtaining knowledge, skills, and abilities necessary for a change in grade level (i.e., promotion), occupational series, or fields. IDPs require supervisor approval and may require higher-level authorization. While not a competitive program or directly associated with career development, GSA also maintains a comprehensive Leadership Development Framework derived from OPM Executive Core Qualifications (ECQs) that allows employees to focus on leadership competencies throughout the various stages of their careers, in preparation for future opportunities. That Framework identifies 28 leadership competencies, divided into five ECQs: (1) Leading Change, (2) Leading People, (3) Results Driven, (4) Business Acumen, and (5) Building Coalitions; along with the Fundamental Competencies of Integrity/Honesty, Interpersonal Skills, Written Communication, Oral Communication, Continual Learning, and Public Service Motivation. Furthermore, the Framework is divided into five major roles, each aligned to particular grade levels, including: (1) Leading Self – Team Member (GS13 and below), (2) Leading Teams – Supervisor (GS13-GS14), (3) Leading Organizations – Manager (GS14-GS15), (4) Leading Strategy – Executive (SES), and (5) Fundamental Programs (all GSA employees).

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Training Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Internship Programs	553	23	41	2	25	2
Fellowship Programs	160	23	11	2	5	1
Other Career Development Programs	169	87	19	9	6	5

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWD)

Answer Yes

b. Selections (PWD)

Answer Yes

The eleven FY21 CDPs were consolidated into the seven categories used in the mandatory MD-715 data tables, then assessed for triggers using that framework. Course-specific nominee pool data was not available, so eligible grade levels were the primary factor used for identifying eligibility and was the key factor used for identifying “applicants.” Comparing participant rates of eligible feeder pools to participation rates within the consolidated CDP applicant pool, there were triggers for PWD in all seven categories. With respect to selections, PWD had participation triggers in the GS-14 category (comprised of three relevant CDPs) and the Supervisor category (comprised of a different three CDPs).

4. Do triggers exist for PWTd among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWTd)

Answer Yes

b. Selections (PWTd)

Answer Yes

The eleven FY21 CDPs were consolidated into the seven categories used in the mandatory MD-715 data tables, then assessed for triggers using that framework. Course-specific nominee pool data was not available, so eligible grade levels were the primary factor used for identifying eligibility and was the key factor used for identifying “applicants.” Comparing participant rates of eligible feeder pools to participation rates within the consolidated CDP applicant pool, there were triggers for PWTd in all seven categories. With respect to selections, PWTd had participation triggers in the GS-14 category (comprised of three relevant CDPs) and the Supervisor category (comprised of a different three relevant CDPs).

**C. AWARDS**

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

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTd)

Answer Yes

There are triggers for PWD in time-off awards between 11 hours and 40 hours and triggers for PWTd in time-off awards of 11-20 hours and awards of 31 hours or more. With respect to cash awards, there are triggers of both PWD and PWTd in all categories, except \$500 and under for PWD and \$1000-\$1999 for both PWD and PWTd.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	653	6.74	5.39	8.41	6.47
Time-Off Awards 1 - 10 Hours: Total Hours	4375	44.30	36.19	58.86	41.95
Time-Off Awards 1 - 10 Hours: Average Hours	6.7	0.28	0.08	2.10	-0.02
Time-Off Awards 11 - 20 hours: Awards Given	253	1.88	2.36	0.60	2.09
Time-Off Awards 11 - 20 Hours: Total Hours	4106	31.16	38.15	9.61	34.65
Time-Off Awards 11 - 20 Hours: Average Hours	16.23	0.69	0.18	4.80	0.03
Time-Off Awards 21 - 30 hours: Awards Given	70	0.50	0.65	0.90	0.44
Time-Off Awards 21 - 30 Hours: Total Hours	1766	12.48	16.46	21.62	11.00

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 21 - 30 Hours: Average Hours	25.23	1.04	0.29	7.21	0.04
Time-Off Awards 31 - 40 hours: Awards Given	23	0.17	0.21	0.00	0.19
Time-Off Awards 31 - 40 Hours: Total Hours	868	6.37	7.71	0.00	7.40
Time-Off Awards 31 - 40 Hours: Average Hours	37.74	1.59	0.43	0.00	1.85
Time-Off Awards 41 or more Hours: Awards Given	1359	13.27	11.62	7.81	14.16
Time-Off Awards 41 or more Hours: Total Hours	75516	728.31	649.91	599.40	749.20
Time-Off Awards 41 or more Hours: Average Hours	55.57	2.30	0.64	23.05	-1.07

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	786	6.32	7.08	6.01	6.37
Cash Awards: \$501 - \$999: Total Amount	563566.32	4626.30	5054.90	4387.39	4665.02
Cash Awards: \$501 - \$999: Average Amount	717.01	30.64	8.14	219.37	0.05
Cash Awards: \$1000 - \$1999: Awards Given	1522	16.58	12.45	17.42	16.45
Cash Awards: \$1000 - \$1999: Total Amount	2458726.69	27324.33	20002.25	28640.24	27111.09
Cash Awards: \$1000 - \$1999: Average Amount	1615.46	69.00	18.32	493.80	0.17
Cash Awards: \$2000 - \$2999: Awards Given	2796	19.47	26.01	20.12	19.37
Cash Awards: \$2000 - \$2999: Total Amount	6783359.34	46361.61	63341.22	47275.08	46213.59
Cash Awards: \$2000 - \$2999: Average Amount	2426.09	99.70	27.77	705.60	1.52
Cash Awards: \$3000 - \$3999: Awards Given	1207	8.12	11.25	7.21	8.27
Cash Awards: \$3000 - \$3999: Total Amount	4172590	28365.58	38827.32	25038.74	28904.67
Cash Awards: \$3000 - \$3999: Average Amount	3456.99	146.21	39.34	1043.28	0.85
Cash Awards: \$4000 - \$4999: Awards Given	1235	6.28	12.14	4.80	6.52
Cash Awards: \$4000 - \$4999: Total Amount	5516680.64	27767.42	54325.19	21309.01	28813.97
Cash Awards: \$4000 - \$4999: Average Amount	4466.95	185.12	51.01	1331.81	-0.70
Cash Awards: \$5000 or more: Awards Given	1330	5.40	13.35	7.51	5.06
Cash Awards: \$5000 or more: Total Amount	7734029	31081.95	77733.07	44143.24	28965.45
Cash Awards: \$5000 or more: Average Amount	5815.06	240.95	66.38	1765.73	-6.14

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

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

There is a trigger for PWD, who receive Quality Step Increases (QSI) at a rate of 0.63%, compared to the QSI rate of 1.18% for persons without disabilities.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0	0.00	0.00	0.00	0.00

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

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTD) Answer N/A

Data on other types of recognition is not currently available.

**D. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

For SES, there was no data provided in FY21 relating to internal selections. This issue was previously identified as a data shortfall by the EEOC in their September 30, 2021 feedback on GSA’s FY20 MD-715 report submission. For GS-15, there were zero selections among seven PWD. For GS-13, the rate of PWD among Internal Selections was 29%, compared to a rate of 39% among Qualified Internal Applicants. Note: Trigger identification in this area is negatively impacted by a very low rate (14% overall) of

applicant self-identification of disability status.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

For SES, there was no data provided in FY21 on internal selections. For GS-15, there was only one PWTD Qualified Internal Applicant and zero selected. For GS-14, the participation rate of PWTD among Qualified Internal Applicants was 17.2%; however, the rate among Internal Selections was only 7.7%. Note: Trigger identification in this area is negatively impacted by a very low rate (14% overall) of applicant self-identification of disability status.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD) Answer No

b. New Hires to GS-15 (PWD) Answer Yes

c. New Hires to GS-14 (PWD) Answer No

d. New Hires to GS-13 (PWD) Answer No

For SES, there was no applicant flow data provided for new hires in FY21. This issue was previously identified as a data shortfall by EEOC in their feedback on GSA’s FY20 MD-715 report submission. For GS-15, there were zero PWD selections among 24 selectees from 98 announcements. A total of 368 PWD voluntarily self-identified, of which 256 were qualified and only 53 were referred, none of whom were selected. Note: Trigger identification in this area was negatively impacted by a very low rate (13% overall) of applicant self-identification of disability status.

4.

Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

For SES, there was no applicant flow data provided for new hires in FY21. For GS-15, there were zero PWTD selections among 24 selectees from 98 announcements. A total of 169 PWTD voluntarily self-identified, of which 113 were qualified and only 21 were referred, none of which were selected. Note: Trigger identification in this area was negatively impacted by a very low rate (13% overall) of applicant self-identification of disability status.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Executives
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer Yes
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- c. Supervisors
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer Yes

Trigger identification in this area was negatively impacted by an exceptionally low rate (7% overall) of applicant self-identification of disability status. For Executives, of the ten Qualified Internal Applicants (out of 135) who identified disability status, 40% were PWD; however, zero PWD were selected. For Supervisors, the one Qualified Internal Applicant (out of 12) who identified disability status also identified as PWD; however, zero PWD were selected.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Executives
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer Yes
- b. Managers

- i. Qualified Internal Applicants (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer No
- c. Supervisors
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer Yes

Trigger identification in this area was negatively impacted by an exceptionally low rate (7% overall) of applicant self-identification of disability status. For Executives, of the ten Qualified Internal Applicants (out of 135) who identified disability status, one was PWTD; however, zero PWTD were selected. For Supervisors, the one Qualified Internal Applicant (out of 12) who identified disability status also identified as PWTD; however, zero PWD were selected.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWD) Answer Yes
  - b. New Hires for Managers (PWD) Answer Yes
  - c. New Hires for Supervisors (PWD) Answer Yes

For Executives, only 18% of the Qualified Applicant Pool self-identified disability information. Of those, 28% identified as PWD; however, zero PWD were selected. For Managers, 39% of the Qualified Applicant Pool identified as PWD; however, only 27% of selectees were PWD. For Supervisors, 40% of the Qualified Applicant Pool self-identified disability information. Of those, 43% identified as PWD; however, zero PWD were selected. There were only two selections, neither of which identified disability status information.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWTD) Answer Yes
  - b. New Hires for Managers (PWTD) Answer Yes
  - c. New Hires for Supervisors (PWTD) Answer Yes

For Executives, only 18% of the Qualified Applicant Pool self-identified disability information. Of those, 11% identified as PWTD; however, zero PWTD were selected. For Managers, 18% of the Qualified Applicant Pool identified as PWTD; however, only 9% of selectees were PWTD. For Supervisors, 40% of the Qualified Applicant Pool self-identified disability information. Of those, 21% identified as PWTD; however, zero PWTD were selected. There were only two selections, neither of whom identified disability status information.

## Section VI: Plan to Improve Retention of Persons with Disabilities

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

- 1.



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

Answer No

As of April, 2022, GSA had 218 employees with Schedule A(u) appointment codes, of whom 43 employees were still in the excepted service after completion of at least two years of service (an average of six years beyond the ends of their respective probationary periods). Performance does not appear to be a factor relating to non-conversions, as all 43 employees received satisfactory (or better) performance ratings in FY21. Of 78 Schedule A(u) employees in probationary status as of April, 2022, 23 employees will reach the end of their probation during FY22.

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

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer Yes

Among Voluntary Separations, People without Disabilities (PWoD) had an Inclusion Rate (IR) of 7.5 percent; however, PWD had an inclusion rate of 8.1 percent. Among Involuntary Separations, PWoD had an IR of 0.31 percent; however, PWD had an IR of 0.34 percent.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	36	0.32	0.30
Permanent Workforce: Resignation	214	2.11	1.75
Permanent Workforce: Retirement	330	2.48	2.90
Permanent Workforce: Other Separations	305	3.21	2.44
Permanent Workforce: Total Separations	885	8.12	7.39

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

a. Voluntary Separations (PWTD) Answer No

b. Involuntary Separations (PWTD) Answer Yes

Among Involuntary Separations, People without Targeted Disabilities (PWoTD) had an Inclusion Rate (IR) of 0.39 percent; however, PWTD had an inclusion rate of 0.6 percent.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	36	0.58	0.30
Permanent Workforce: Resignation	214	1.46	1.83
Permanent Workforce: Retirement	330	3.51	2.79
Permanent Workforce: Other Separations	305	3.51	2.57
Permanent Workforce: Total Separations	885	9.06	7.49

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

The agency does not use an exit survey that includes questions on how the agency can improve recruitment, hiring, advancement, inclusion, or retention of PWD or PWTD. Some subcomponents use exit surveys and/or an independent exit interview process, however, the results of those efforts are not centrally managed or reported to the GSA Central Office for compiling and reporting. Plan Part H.19 addresses resolution of the deficient exit survey language. Analysis of requests for reasonable accommodations for FY20 and FY21 identified significant differences between the processing time for requests that were (a) approved or (b) approved with modification, and those requests that were (c) denied. The maximum processing time permitted by GSA reasonable accommodations procedures is 30 days; however, in FY21, approved requests were processed in an average of 18 days (although 25% of approved requests took longer than 30 days). Requests that were approved with modification averaged 41 days, while denied requests took an average of 60 days for a decision to be reached. Because of the changes in the FY21 employment environment due to COVID, FY21 reasonable accommodations data was believed to be atypical (e.g., FY21 saw only half the request volume of FY20), so the analysis was expanded to also include FY20 data. During FY20, reasonable accommodations approvals and approvals with modification both took an average of 37 days; however, denials took an average of 70 days for a decision to be reached. Due to resource constraints, potential correlations between reasonable accommodations processing times and separations could not be explored further in FY21. In FY21 there was one complaint filed with both removal as an issue and disability as a basis and one for disability-related reasonable accommodation, as well as six settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability). In FY20 there was one complaint filed with both removal as an issue and disability as a basis and eleven complaints filed for disability-related reasonable accommodation, as well as four settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability). In FY19 there were four complaints filed with both removal as an issue and disability as a basis and eight for disability-related reasonable accommodation, as well as one settlement relating to disability and reasonable accommodations (but no settlements relating to removal and disability). In FY18 there were no complaints filed with both removal as an issue and disability as a basis, but there were twelve filed for disability-related reasonable accommodation, as well as eight settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability).

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

Information on rights associated with Section 508 of the Rehabilitation Act is at <https://www.gsa.gov/policy-regulations/policy/information-integrity-and-access/it-accessibilitysection-508>; however, it does not identify how to file a complaint.

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

Information on rights associated with the Architectural Barriers Act is at <https://www.gsa.gov/real-estate/design-construction/accessible-facility-design>; however, the site does not include information on how to file a complaint.

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

GSA is assessing accessibility as part of its of expansive DEIA efforts.

## C. REASONABLE ACCOMMODATION PROGRAM

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

- 1.

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

The average processing time for requests for reasonable accommodations in FY21 was approximately 25 days; however, that figure includes seven requests that have data missing on processing milestones and two requests for which processing data cannot be accurate. Of 80 requests, 56 were timely processed, 15 were untimely processed, and the remaining 9 requests could not be accurately assessed. Approved requests took an average of 18 days (although 25% of approved requests took longer than 30 days). Requests approved with modification averaged 41 days and denied requests took an average of 60 days for a decision to be reached. All figures reflect total days-in-process, minus all time between when medical documentation was requested and received. The FY21 performance was an improvement over FY20, which averaged 37 days for both approvals and approvals with modification and 70 days for denials; however, the overall volume of requests in FY21 was only half that of FY20.

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

Over the past three years, (1) approximately 30% of requests for reasonable accommodations have been untimely processed; (2) many requests have been very untimely, taking well beyond 30 days (even after properly accounting for time required to obtain medical documentation); and (3) data on reasonable accommodations has consistently been incomplete and/or inaccurate. The current reasonable accommodation data system does not track additional metrics of effectiveness, such as timeliness of providing approved accommodations. Planned improvements to the reasonable accommodations program are addressed in Part H corrective plans.

**D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE**

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

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

GSA had no requests for personal assistance services in FY21.

**Section VII: EEO Complaint and Findings Data**

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

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

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

No complaints alleging harassment resulted in findings. Five complaints alleging harassment based on disability status resulted in settlements.

**B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

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

Answer Yes

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

Answer Yes

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

No complaints alleging failure to provide a reasonable accommodation resulted in findings. Four complaints alleging reasonable accommodation as an issue resulted in settlements.

**Section VIII: Identification and Removal of Barriers**

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

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

Answer Yes

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

Answer Yes

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

<b>Source of the Trigger:</b>	Other				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Untimely processing of reasonable accommodations for the past three years was identified in FY21 as a barrier to PWD. Objectives, planned activities, and the relevant responsible official with authority and control over agency reasonable accommodations are described in Part H plans.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	Y				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
	Untimely processing of reasonable accommodations		Untimely processing of reasonable accommodations in FY19, F20, and FY21 is a barrier to PWD.		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
03/16/2022	09/30/2022	Yes			Improve the reasonable accommodations program. Provide sufficient funding, qualified staffing, and an effective, accurate data system to enable consistently timely processing of requests for reasonable accommodations and to provide accurate and complete data required to support annual assessments, trigger identification, and barrier analyses. Improve the reasonable accommodations data system by adding relevant measures of effectiveness identified in MD-715 Part J.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Chief Human Capital Officer		Traci DiMartini		No	
EEO Director		Aluanda Drain		Yes	

<b>Planned Activities Toward Completion of Objective</b>				
<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/29/2022	Research all requests for reasonable accommodation that were untimely processed in FY20 and FY21, in order to identify root causes and contributing factors, and develop and implement appropriate corrective and preventative measures.	Yes		
09/30/2022	Collaborate with the AEPM, who will assist to identify, develop, and incorporate improvements to the reasonable accommodations data system to (a) improve data accuracy and completeness, (b) flag requests that are approaching established deadlines (i.e., before they become non-compliant) and requests that have exceeded established processing requirements, (c) automate calculations, (d) support trigger identification, (e) support barrier analysis, and (f) identify timeframes for implementation of approved accommodations.	Yes		
09/30/2023	Make relevant changes to reasonable accommodations processing procedures to elevate visibility of requests that are approaching or have exceeded the established deadline, with goals of providing enhanced oversight, reducing processing times, identifying and tracking root causes for processing delays, and enabling iterative improvements through tracking of lessons learned and application of best practices.	Yes		
<b>Report of Accomplishments</b>				
<b>Fiscal Year</b>	<b>Accomplishment</b>			

<b>Source of the Trigger:</b>	Other				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Insufficient implementation of the Affirmative Action Plan for PWD was identified as an overarching barrier affecting aspects of recruitment, hiring, advancement, and retention of PWD. Similarly, shortfalls in execution and coordination of the DVAAP and SPP also directly affect opportunities for PWD.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	Y				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
	Insufficient implementation of AAP for PWD		Insufficient implementation of the Affirmative Action Plan for PWD was identified as an overarching barrier affecting aspects of recruitment, hiring, advancement, and retention of PWD. Similarly, shortfalls in execution and coordination of the DVAAP and SPP also directly affect opportunities for PWD.		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
01/12/2022	07/29/2022	Yes			Develop and implement regular collaborative meetings and objectives relating to each of the four major focus areas of the Affirmative Action Plan (AAP) for Persons with Disabilities (PWD) (i.e., (1) recruitment, (2) hiring, (3) advancement, and (4) retention of PWD), as well as collaborative meetings to coordinate efforts with HR recruitment programs (e.g., Federal Equal Opportunity Recruitment Program (FEORP), Selective Placement Program (SPP), and Disabled Veterans Affirmative Action Program.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Chief Human Capital Officer		Traci DiMartini		No	
EEO Director		Aluanda Drain		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
06/30/2022	Identify relevant HR subject matter experts (SMEs) for each of the four AAP focus areas and establish regular meetings between the HR SMEs, PWD Special Emphasis Program Co-Managers (SEPMs), DEIA Program Manager, and the Affirmative Employment Program Manager, no less than quarterly, to collaborate on generating plans; identifying resources/requirements; tracking progress toward attainment of AAP requirements and goals; and fulfilling MD-715, FEORP, and DVAAP reporting requirements. Convene initial meetings between the SMEs, PWD SEPMs, DEIA PM and AEPM no later than 6/30/2022. As initial topics, include discussion of agency PWD and PWTd participation rates, federal and agency goals, triggers, and trends; AAP contents; MD-715 reporting requirements; and relevant topics within each individual focus area.	Yes		
06/30/2022	Establish and conduct meetings, no less than quarterly, between the AEPM, FEORP Manager, SPP Coordinator, and DVAAP Manager to coordinate program activities; review plans, status, and progress; and to identify areas of potential collaboration.	Yes		
07/29/2022	Establish agency participation goals for PWD and persons with targeted disabilities (PWTd). Consider setting an initial goal 50% higher than the federal goals of 12% for PWD and 2% for PWTd within both low- and high-grade level clusters (i.e., GSA goals of 18% for PWD and 3% for PWTd).	Yes		

Report of Accomplishments	
Fiscal Year	Accomplishment

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

Not applicable. All planned activities are future events.

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

Not applicable. All planned barrier elimination activities are future events.

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

Not applicable. All planned barrier elimination activities are future events. Both prioritized FY20 triggers relating to PWD/PWTd were eliminated in FY21 through improvements to disability status data.