

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 has no triggers 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 has no triggers in this measure.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES	11965	3144	26.28	442	3.69
Grades GS-1 to GS-10	890	277	31.12	56	6.29

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

Training provided to OHRM employees highlights the GSA's agency-specific participation goals for PWD and PWTD. In addition, the training is recorded and added to the GSA Online University and was made mandatory for all supervisors in 2024. The training addresses efforts to improve recruitment of PWD and PWTD, awareness and use of the Schedule A(u) appointment authority, successful integration of Schedule A(u) hires into the workforce, and timely conversion of Schedule A(u) hires to the competitive service.

Section II: Model Disability Program

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

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

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

Answer Yes

While several deficiencies and barriers affecting PWD and PWTD remained at the end of FY 2024, notable progress was made during the year in many associated areas and programs, due largely to re-prioritizing relevant work. Most notably: • Improved collaboration between OHRM and OCR on the AAP for PWD eliminated the associated barrier and four related Part G deficiencies. • Enhanced oversight of the Schedule A(u) program resulted in significant progress toward removing a second barrier, through systematic conversion of 42 of 44 eligible employees previously overdue for conversion from the excepted service to the competitive service. Simultaneously, improved oversight also resulted in improved conversion timeliness for more recent Schedule A(u) employees who became newly eligible in FY 2024. • Progress was also made on a third identified barrier affecting PWD: The timeliness of processing of requests for disability-related reasonable accommodations improved, to a record 91% timely processed in FY 2024, up from a previous record of 86% timely processed in FY 2023 and 62% in FY 2022. • Through efforts to improve awareness and encourage self-identification, the percentage of GSA employees with disabilities increased to a record 26.5% at the end of FY 2024, exceeding the previous record of 24.63% in FY 2023. More than 60% of GSA PWD are disabled veterans. In addition to gains in PWD, the percentage of PWTD in the GSA workforce also increased to a new record high of 3.91%, exceeding the previous record of 3.74% set in FY 2023. • OHRM expanded the GSA Exit Survey to capture perceptions of departing employees on how the agency can improve recruitment, hiring, advancement, and retention of PWD, correcting an associated Part G deficiency. • OHRM and OCR collaborated on development of a “disability dashboard” to capture, compile, and display aggregated real-time (non-PII) data on key metrics related to PWD, PWTD, and disabled veterans, in order to support the Affirmative Action Plan for PWD, DVAAP, and Selective Placement Program, as well as both agency and service/staff office efforts to recruit, hire, advance, and retain disabled veterans and other persons with disabilities.

- 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
Architectural Barriers Act Compliance	0	0	12	Michael Foegelle National Accessibility Officer michael.foegelle@gsa.gov
Processing reasonable accommodation requests from applicants and employees	20	0	0	Emily Claybrook Reasonable Accommodation Coordinator emily.claybrook@gsa.gov

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	2	0	21	Chuck Popelka/Daniel Perkins Section 508 Deputy/Program Manager charles.popelka@gsa.gov; dan.perkins@gsa.gov
Special Emphasis Program for PWD and PWTD	0	0	0	Language may not be aligned with E.O. 14173 or OPM guidance memos

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

Answer Yes

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, additional refresher training may be appropriate for participants in the reasonable accommodations process (e.g., supervisors, Local Reasonable Accommodations Coordinators, legal representatives), in order to make further improvements to processing timeliness. Additionally, in FY 2024, GSA implemented mandatory training for supervisors regarding use of the Schedule A(u) authority, both to expand awareness and use of the program and to improve integration rates of Schedule A(u) hires into the GSA workforce, as well as the timeliness of conversions of eligible Schedule A(u) employees into the competitive service.

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 Yes

N/A

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	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.		
Objective	Timely deny or provide effective disability-related reasonable accommodations within 30 days of requests for accommodation, absent extenuating circumstances, and not including time required to obtain additional medical documentation (if required and requested).		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2024	GSA continued to make progress toward reducing untimely processing of requests for disability-related reasonable accommodations, achieving a record high 91% timeliness in FY 2024 (up from 86% in FY 2023 and approximately 62% between FY 2020 and FY 2022).	

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.

In alignment with federal regulations requiring agencies to implement lawful affirmative actions to recruit and hire PWD, GSA utilized OPM's Shared Register of Candidates with Disabilities and the Department of Labor's Workforce Recruitment Program. Additionally, GSA conducted both in-person and virtual outreach to a variety of PWD-focused institutions (e.g., Rochester Institute of Technology, Gallaudet University) utilizing, where possible, alumni of those institutions to be part of those engagements. Additionally, the agency used the USAJOBS hiring path for Individuals with Disabilities to identify positions that are open to candidates who identify as such. The application process allows the applicant to self-identify as a person who is eligible for hire under a special hiring authority and to name the special hiring authority specifically. GSA's Selective Placement Program Coordinator (SPPC) helps the agency recruit, hire, and accommodate people with disabilities and provides guidance throughout the application process and answers questions from applicants, employees, and hiring managers relating to the hiring of PWD.

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

Collectively, GSA's current employees were hired using a total of 104 different appointment authorities. Of those, there are 8 authorities that always take disability into account (e.g., Schedule A(u) appointments (or conversions), 30% or More Disabled Veteran appointments (or conversions), or appointment of disabled veterans from Veterans Affairs programs). Overall, 766 employees (5.7%) have been appointed by authorities that always take disability into account; however, of those, only 521 (68%) self-identify as having a disability. Discounting Schedule A(u) appointments and conversions of employees who were Schedule A(u) appointees, 267 other employees have been appointed by authorities that always take disability into account; however, of those, only 76 (34%) self-identify as having a disability. Additionally, there are two additional authorities (VRA and VEOA) that may take disability into account, but may also be used to appoint individuals without disabilities. With respect to the VRA and VEOA authorities, of 735 VRA and VEOA appointments, only 147 (20%) identify as having a disability; however, of the VRA and VEOA appointees who do not identify as having a disability, 260 (35%) also have either Veterans Preference Code (VPC) 04 or VPC 06, both of which, by definition, indicate a service-connected disability. Independent of appointment authorities, there are 2071 GSA employees who have VPC 04 or 06; however, only 674 self-identify in the system of record as having a disability. The 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 not widely used as a targeted recruitment tool. The agency's Merit Promotion announcements specifically include the USAJOBS Hiring Path for Individuals With Disabilities to identify that the vacancy is open to those who meet that criteria. Where applicable and when such a selection is made, the Schedule A(u) hiring authority is cited for the hire. The agency also utilizes the Workforce Recruitment Program to supplement entry-level hiring efforts. A total of 499 employees (3.7%) are Schedule A(u) or converted (former) Schedule A(u) hires. Analysis of appointment authorities identified 104 different appointment authorities used for the FY 2024 workforce, of which 2 authorities account for 30% of employees, 4 authorities account for 50% of employees, and 17 account for 90% of the GSA workforce. Among the top appointment authorities, LIM (Schedule A(u) conversions) was ranked #12 (2.4% of employees), LZM (Conversion of 30% or More Disabled Veterans) was ranked #14 (1.6% of employees), and WUM (Schedule A(u)) was ranked #18 (1.3% of employees).

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. The agency advises applicants in

vacancy announcements of the documentation requirements for claiming eligibility under special hiring authorities (including Schedule A(u)). When applications are reviewed by human resources specialists, eligibility determinations are made on the basis of the supporting documentation, which may include a disability letter from a doctor or a licensed medical professional that proves their eligibility for Schedule A(u) appointment. Once eligibility is determined, the candidate is also reviewed for meeting qualification requirements. An eligible, qualified Schedule A(u) applicant is referred on the non-competitive merit promotion referral list to management, for review with other candidates.

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 Yes

Managers and supervisors are required to take initial and recurring training courses which include topics related to hiring authorities, including Schedule A(u). All managers and supervisors were compliant with this requirement in FY 2024. Additional training was added in FY 2024 to further educate hiring managers specifically about the Schedule A(u) authority.

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.

In alignment with laws and federal regulations directing agencies to maintain Affirmative Action Plans for PWD, the GSA National Recruitment Center maintained regularly updated lists of candidate sourcing options that included 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).

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. Permanent hires in FY 2024 were 19.48% PWD and 5.47% PWTD.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	120519	9.72	0.45	4.90	0.22
% of Qualified Applicants	90151	8.86	0.49	4.36	0.24
% of New Hires	1015	6.70	0.99	2.76	0.59

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

Among most mission-critical occupations, PWD and/or PWTD rates increase from the qualified phase to the referred phase, then drop considerably between the referral and selection phases. While that is technically a trigger, meaningful analysis of the issue is negatively impacted by extremely low rates of self-identification. With respect to application documentation related to disability status, the vast majority of applicants to GSA have historically simply left that section of their respective onboarding forms blank. In FY 2024, only 11% of new hire applicants and only 9% of internal competitive promotion applicants self-identified their disability status during the application process. By comparison, roughly 86% of FY 2024 applicants self-identified race/national origin and sex. Furthermore, after onboarding, PWD and PWTD rates among employees are considerably higher than the associated applicant rates. Permanent hires in FY 2024 were 19.48% PWD and 5.47% PWTD.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0201 HUMAN RESOURCES MANAGEMENT	35	8.57	5.71
0301 MISC ADMINISTRATION AND PROGRAM	77	9.09	2.60
0343 MANAGEMENT AND PROGRAM ANALYSIS	47	12.77	2.13
0501 FINANCIAL ADMINISTRATION AND PROGRAM	16	0.00	0.00
0560 BUDGET ANALYSIS	10	0.00	0.00
0905 GENERAL ATTORNEY	9	11.11	0.00
1101 GENERAL BUSINESS AND INDUSTRY	220	6.82	2.27
1102 CONTRACTING	192	6.77	4.17
1170 REALTY	23	8.70	0.00
1176 BUILDING MANAGEMENT	86	5.81	2.33
2150 TRANSPORTATION OPERATIONS	35	5.71	2.86
2210 INFORMATION TECHNOLOGY MANAGEMENT	179	7.82	3.91

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

All mission-critical occupations have PWD and/or PWTD triggers related to differences between (a) rates in relevant applicant pools and (b) rates of qualified applicants; however, meaningful analyses of these issues are negatively impacted by extremely low rates of applicant disability self-identification.

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

Some mission-critical occupations have triggers related to differences between (a) relevant applicant pools and (b) applicants and/or between (c) qualified applicants and (d) selectees; however, meaningful analyses of these issues are negatively impacted by extremely low rates of self-identification. Comments in Section III.C.2 answer apply.

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 external Competitive Development Programs (CDPs) and internal career development opportunities advertised through the GSA Opportunity Network, a developmental program that offers a variety of temporary opportunities to all employees, including PWD. Those opportunities include (1) part-time projects, (2) job shadowing experiences, (3) full-time details to the same grade level/unclassified duties of 120 days or less, and (4) full-time temporary promotions of 120 days or less. In FY 2024, GSA conducted an analysis of grade level distributions within each of GSA's 100 occupational series. A preliminary distinction was made between (a) positions up to and including grade level GS13 and (b) positions at grade level GS14 and higher. Six tiers were identified, based on the percentage of series positions at GS14 and higher: (1) 0%, (2) 0.1% to 9.9%, (3) 10% to 19.9%, (4) 20% to 29.9%, (5) 30% to 49.9%, and (6) 50% or higher. A further dividing line was then identified at the 30% mark (i.e., between Tier 4 and Tier 5), as half of the GSA workforce was found to be in series with fewer than 30% of positions at GS14 and higher and half of the GSA workforce was found to be in occupations that go no further than GS13. An initial focus was on the 41 occupations that have zero positions at GS14 or higher (and which account for 5% of the workforce). Subsequent comparisons of group rates in the overall GSA and group rates in Tier 1, Tiers 2-4, and Tiers 5-6 determined that the lowest rates of PWD and PWTD are in Tiers 5-6 (those with the highest percentage of positions in high grade levels) and the highest rates of PWD and PWTD are in Tier 1 (series that have zero positions above GS13). In FY 2025, GSA plans to conduct deeper root cause analysis into the series and grade level distributions of PWD and PWTD. Preliminary analyses suggest at least a partial correlation between self-identification and grade level, and also found low self-identification rates within particular occupations (i.e., low PWD and PWTD rates in high grades may be due, in part, to low self-identification, rather than a lack of PWD or discrimination against PWD). Future root cause analyses are planned to further investigate the reasons for low self-identification rates among employees in high grade levels and certain occupations.

B. CAREER DEVELOPMENT OPPORTUNITIES

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 both external and internal programs. CDPs are agency-wide offerings that provide leadership development opportunities via recognized external programs that focus on leadership competencies required for current and future leaders, and internal programs include both agency-wide opportunities (such as details, temporary promotions, and part-time projects advertised through the GSA Opportunity Network), as well as programs unique to particular offices, programs, or business lines. Specific CDPs vary from year to year. The FY 2024 CDPs included 9 grade-specific courses from 6 major sources, including (1) eCornell (two leadership courses), (2) Graduate School USA (Executive Leadership Program and Executive Potential Program), (3) Partnership for Public Service (Excellence in Government Fellows Program and Leadership Excellence in Acquisition Program), (4) Harvard Kennedy School (Leadership Decision-Making Online Program), (5) Center for Creative Leadership (Maximizing Your Leadership Potential), and (6) American University (New Supervisor Leadership Development Program). The programs each have different eligibility criteria, focus areas, and develop different competencies, up to and including Senior Executive Service candidate development. Internal GSA offerings included the (1) GSA Start Program, (2) Targeted Leadership Development Program, (3) Mentoring Programs, (4) Coaching services, and (5) Enterprise Emerging Leaders Program, as well as opportunities advertised through the GSA Opportunity Network for (1) part-time projects, (2) job shadowing experiences, (3) full-time details to the same grade level/unclassified duties of 120 days or less, and (4) full-time temporary promotions of 120 days or less. GSA's Mentoring Program and various sub-component

mentoring programs establish 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 (e.g., succession planning, knowledge transfer, training). 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 (%)
Coaching Programs	0	0	0	0	0	0
Detail Programs	395	227	28.10	25.99	4.30	3.08
Other Career Development Programs	252	28	29.37	28.57	4.76	3.57
Fellowship Programs	15	0	0	0	0	0
Mentoring Programs	29	28	34.48	32.14	3.45	3.57
Training Programs	324	112	31.48	22.32	4.94	2.68
Internship Programs	6677	188	6.78	5.32	3.94	2.66

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

PWD have higher participation rates among applicants than selectees for all career development programs. Furthermore, the selection rates for FY 2024 were lower for all categories of career development opportunities, except for details.

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

PWTD have higher participation rates among applicants than selectees for all analyzed career development programs, except for mentoring programs.

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

Yes; there are triggers for PWD and/or PWTD in time-off awards between 11 hours and 40 hours. With respect to cash awards, there are triggers for PWD and/or PWTD in the \$500-\$999 category and all categories \$2000 and higher.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	1075.00	30.3256	69.6744	5.0233	94.9767
Time-Off Awards 1 - 10 Hours: Total Hours	7486.00	30.4569	69.5431	4.9693	95.0307
Time-Off Awards 1 - 10 Hours: Average Hours	6.96	6.9939	6.9506	6.8889	6.9677
Time-Off Awards 11 - 20 hours: Awards Given	523.00	22.1797	77.8203	3.8241	96.1759
Time-Off Awards 11 - 20 Hours: Total Hours	8282.00	22.1082	77.8918	3.8638	96.1362
Time-Off Awards 11 - 20 Hours: Average Hours	15.84	15.7845	15.8501	16.0000	15.8290
Time-Off Awards 21 - 30 hours: Awards Given	180.00	21.1111	78.8889	4.4444	95.5556
Time-Off Awards 21 - 30 Hours: Total Hours	4424.00	21.4286	78.5714	4.4530	95.5470
Time-Off Awards 21 - 30 Hours: Average Hours	24.58	24.9474	24.4789	24.6250	24.5756
Time-Off Awards 31 - 40 hours: Awards Given	82.00	19.5122	80.4878	1.2195	98.7805

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 31 - 40 Hours: Total Hours	2985.00	19.8325	80.1675	1.0720	98.9280
Time-Off Awards 31 - 40 Hours: Average Hours	36.40	37.0000	36.2576	32.0000	36.4568
Time-Off Awards 41 or more Hours: Awards Given	1763.00	31.3670	68.6330	4.8213	95.1787
Time-Off Awards 41 or more Hours: Total Hours	103384.00	30.2213	69.7787	4.6971	95.3029
Time-Off Awards 41 or more Hours: Average Hours	58.64	56.4991	59.6198	57.1294	58.7175

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards \$500 and Under: Awards Given	3922.00	26.5426	73.4574	3.6971	96.3029
Cash Awards \$500 and Under: Total Amount	1352655.71	25.8621	74.1379	3.6374	96.3626
Cash Awards \$500 and Under: Average Amount	344.89	336.0473	348.0841	339.3172	345.1032
Cash Awards: \$501 - \$999: Awards Given	442.00	18.0995	81.9005	4.0724	95.9276
Cash Awards: \$501 - \$999: Total Amount	306686.57	17.8417	82.1583	4.0338	95.9662
Cash Awards: \$501 - \$999: Average Amount	693.86	683.9781	696.0451	687.2917	694.1399
Cash Awards: \$1000 - \$1999: Awards Given	1004.00	33.0677	66.9323	5.2789	94.7211
Cash Awards: \$1000 - \$1999: Total Amount	1605303.38	34.4572	65.5428	5.1072	94.8928
Cash Awards: \$1000 - \$1999: Average Amount	1598.91	1666.0921	1565.7155	1546.9057	1601.8059
Cash Awards: \$2000 - \$2999: Awards Given	2702.00	24.3893	75.6107	3.5159	96.4841
Cash Awards: \$2000 - \$2999: Total Amount	6659893.30	23.6501	76.3499	3.4210	96.5790
Cash Awards: \$2000 - \$2999: Average Amount	2464.80	2390.0891	2488.9009	2398.2825	2467.2253
Cash Awards: \$3000 - \$3999: Awards Given	1294.00	22.4111	77.5889	3.7094	96.2906
Cash Awards: \$3000 - \$3999: Total Amount	4488613.43	22.6335	77.3665	3.7379	96.2621
Cash Awards: \$3000 - \$3999: Average Amount	3468.79	3503.2103	3458.8470	3495.4583	3467.7620
Cash Awards: \$4000 - \$4999: Awards Given	1169.00	22.8400	77.1600	1.8820	98.1180
Cash Awards: \$4000 - \$4999: Total Amount	5324252.00	22.6413	77.3587	1.8240	98.1760
Cash Awards: \$4000 - \$4999: Average Amount	4554.54	4514.8989	4566.2683	4414.3636	4557.2241
Cash Awards: \$5000 or more: Awards Given	2354.00	12.4894	87.5106	1.6568	98.3432
Cash Awards: \$5000 or more: Total Amount	15267086.63	11.9427	88.0573	1.7508	98.2492
Cash Awards: \$5000 or more: Average Amount	6485.59	6201.7047	6526.1094	6853.6154	6479.3934

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 Yes

Both PWD and PWTD received Quality Step Increases (QSI) at a lower rate than persons without disabilities. Additionally, PWD have a trigger for performance-based awards.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	95.00	9.4737	90.5263	4.2105	95.7895

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 N/A

ii. Internal Selections (PWD) Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a

very low rate of applicant self-identification of disability status. Comments in the Section III.C.2 answer apply.

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 N/A

ii. Internal Selections (PWTD) Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

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 Yes

ii. Internal Selections (PWTD) Answer Yes

For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in the Section III.C.2 answer apply.

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 Yes

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

c. New Hires to GS-14 (PWD) Answer Yes

d. New Hires to GS-13 (PWD) Answer Yes

For SES, there was no data available relating to new hires. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in the Section III.C.2 answer apply.

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 Yes

b. New Hires to GS-15 (PWTD)	Answer	Yes
c. New Hires to GS-14 (PWTD)	Answer	Yes
d. New Hires to GS-13 (PWTD)	Answer	Yes

For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in Section III.C.2 answer apply.

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	Yes
ii. Internal Selections (PWD)	Answer	Yes

b. Managers

i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

c. Supervisors

i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in the Section III.C.2 answer apply.

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	Yes
ii. Internal Selections (PWTD)	Answer	Yes

b. Managers

i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes

c. Supervisors

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

For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in Section III.C.2 answer apply.

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 SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in Section III.C.2 answer apply.

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 SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in Section III.C.2 answer apply.

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

GSA made significant progress in FY 2024 toward converting eligible Schedule A(u) employees from the excepted service into the competitive service. Systematic analysis and collaboration between OCR and OHRM validated dates of employee onboardings, position transitions, and probationary periods, as well as data on appointment authorities, disability status codes, permanent/temporary status, and excepted/competitive service status. Improvements in program oversight following implementation of new Schedule A(u) procedures in FY 2023 resulted in conversion of 42 of 44 eligible Schedule A(u) employees previously identified as overdue for conversion from the excepted service to the competitive service. Simultaneously, the improved oversight also resulted in increased conversion timeliness for more recent Schedule (A)u employees who became newly eligible in FY 2024; however, not all employees who ended probation in FY 2024 were timely converted.

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

a.Voluntary Separations (PWD)

Answer No

b.Involuntary Separations (PWD)

Answer Yes

The percentage of PWD among removals exceeded those of persons without disabilities.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	27	0.34	0.15
Permanent Workforce: Resignation	146	0.90	1.16
Permanent Workforce: Retirement	346	1.41	3.01
Permanent Workforce: Other Separations	317	1.75	2.60
Permanent Workforce: Total Separations	836	4.40	6.92

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 Yes

b.Involuntary Separations (PWTD)

Answer Yes

In all types of separations, the percentages of PWTD exceeded those of persons without disabilities.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	27	0.96	0.17
Permanent Workforce: Resignation	146	2.68	1.03
Permanent Workforce: Retirement	346	4.21	2.52
Permanent Workforce: Other Separations	317	2.49	2.37
Permanent Workforce: Total Separations	836	10.33	6.09

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.

Follow-up analysis was conducted in FY 2023 and FY 2024 into 6 years of exit survey data to analyze terminations of probationary Schedule A(u) employees, with the intention of investigating whether the terminations were potentially related to barriers (such as untimely processing of reasonable accommodations, potentially leading to performance or other follow-on issues); however, none were found to be associated with discriminatory barriers. GSA resolved a Part G deficiency in FY 2024 by adding a question to the GSA Exit Survey on how the agency can improve recruitment, hiring, advancement, and retention of persons with disabilities. In general, most respondents to that question appear to be persons without disabilities, rather than PWD providing first-person perspectives. The majority of responses related to generic employment concerns (e.g., training, speedier hiring actions, the selection process, increased pay), while some responses focused on specific personal considerations unrelated to disability status. Many of the responses identified favorable perceptions of how GSA is addressing employment of PWD. Some recommendations included: • Improving availability of sign language services; • Having announcements specific to PWD only; • Greater availability of remote positions; • Increasing staffing levels; and • Improve efforts to recruit, hire, and retain veterans.

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, including processes to file a Section 508 complaint, is at <https://www.gsa.gov/website-information/accessibility-statement>. Information on how to file a Section 508 complaint is also available to employees only via the internal GSA-only website: <https://insite.gsa.gov/employee-resources/information-technology/it-accessibility-section-508/file-a-508-complaint?term=508+complaint>. Additionally, applicants can access information about available Section 508 complaint processes by clicking the Accessibility Statement located at the bottom of the GSA homepage at www.gsa.gov.

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 (ABA) is on the site: <https://www.gsa.gov/real-estate/design-and-construction/accessible-facility-design>. That site includes a link to the GSA Accessibility Desk Guide, which includes information on how to file ABA complaints through the U.S. Access Board.

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 committed to making Federal buildings and facilities fully accessible to all people, and achieving accessibility is reflected in GSA's commitment to excellence in design, development, and construction. GSA is dedicated to meeting or exceeding Federal, state, and local accessibility standards and to ensuring the full integration of individuals with disabilities who use our facilities. Because GSA's facilities are flexible and adaptable, providing employees and visitors with disabilities the opportunity to take part in all the programs, services, and activities our buildings are designed to support is an attainable goal. GSA is also addressing physical accessibility by aligning with the National Accessibility Program.

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 time to process requests (i.e., to either deny requests for reasonable accommodation or provide the approved accommodations) was 22.4 days.

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.

Further improvements were made to the reasonable accommodations program during FY 2024, expanding on FY 2023 efforts and making notable progress toward resolving both the Part G deficiency and associated Part J barrier related to untimely processing of disability-related accommodation requests. In FY 2024, the GSA achieved a record overall processing timeliness rate of 91% (up from 86% timely in FY 2023 and 62% in FY 2022). While showing improvement, the EEOC timeliness standard is 100% (absent extenuating circumstances), and as such, those requests that are untimely processed remain an employment barrier for PWD. In FY 2024, 100% of eligible onboard supervisors and managers received training on reasonable accommodations as part of biennial No FEAR Act training. In addition to processing and training outcomes, a notable best practice is tracking of contributing factors, including responsible parties (e.g., requestors, deciding officials, reasonable accommodation coordinators, general counsel), for all requests that take longer than the 30 days specified in GSA's policy for providing reasonable accommodation.

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 FY 2024. PAS are addressed in GSA's reasonable accommodations procedures and related training.

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 No

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.

In FY 2024, EEOC calculated the government-wide average for formal complaints filed by PWD alleging disability harassment as 28.93%. Among formal and mixed cases, 10 of 18 closed cases and 19 of 47 open cases were filed by persons with disabilities. Of those cases filed by PWD, 6 of 10 closed cases (60%) and 7 of 19 open cases (37%) alleged disability-related discrimination. None resulted in a finding.

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 No

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.

In FY 2024, EEOC calculated the government-wide average for formal complaints filed by PWD alleging failure to accommodate as 20.33%. Among formal and mixed cases, 10 of 18 closed cases and 19 of 47 open cases were filed by persons with disabilities. Of those cases filed by PWD, 3 of 10 closed cases (30%) and 7 of 19 open cases (37%) alleged failure to accommodate. One complaint alleging failure to provide a reasonable accommodation resulted in a finding. Corrective measures included non-pecuniary damages of \$10,000, and the Agency is required to ensure that the complainant has closed-captioning or Communication

Access Realtime Translation (CART) when necessary. Additionally, the responsible management officials were required to take training, and the agency was required to post an associated Notice to Employees. In addition to the finding, there was one allegation of failure to accommodate that resulted in a settlement agreement. In that case, the agency agreed to meet with the Job Accommodation Network (JAN) to explore options for an appropriate reasonable accommodation.

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

Source of the Trigger:	Other				
Specific Workforce Data Table:	Workforce Data Table - B1				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Untimely processing of reasonable accommodations is a barrier to PWD.				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name Untimely Reasonable Accommodations		Description of Policy, Procedure, or Practice Untimely processing of reasonable accommodations from FY20 thru FY23 is an ongoing barrier affecting PWD and PWTD. The 29 CFR § 1614.203(d)(3)(i) requirement is for agencies to process 100% of requests within the timeframe specified by agency procedures (30 days), absent extenuating circumstances, and not including time required to obtain additional medical documentation. Within that time, agencies must either (a) deny the request or (b) provide the approved accommodation. Out of 203 FY23 requests for disability-related reasonable accommodations, 174 (86%) were timely processed. Twenty-three requests (11%) were untimely decided and six (3%) were untimely provided after approval.		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
05/17/2021	09/30/2021	Yes	09/30/2024		Timely deny or provide effective disability-related reasonable accommodations within 30 days of each request for accommodation, absent extenuating circumstances, and not including time required to obtain additional medical documentation (if required and requested by the agency).
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
EEO Director		Aluanda Drain		Yes	
Chief Human Capital Officer		Arron Helm		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/19/2024	Identify root causes for FY23 instances where either (a) requests for disability-related reasonable accommodations were untimely denied or (b) approved accommodations were untimely provided. Identify all involved parties who contributed to unnecessary delays (e.g., requestor, LRAC, Deciding Official, or OGC), identify resource shortfalls (if any), develop strategies (e.g., training) to help avoid or mitigate those issues in the future, and initiate implementation as soon as practicable.	Yes		
04/26/2024	Upon completion of the first planned activity, update this Part H plan with relevant milestone activities, target dates, and a planned completion date for accomplishing the objective.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2023	Significant improvements were made to the collection, management, sharing, and use of data on requests for disability-related reasonable accommodations. Those improvements not only resolved Part G measure E.4.a.6 (systems to accurately collect, monitor, and analyze processing of requests for reasonable accommodation) and measure B.4.a.1 (resources required to conduct a self-assessment of the agency for possible deficiencies), but also contributed directly to a significant reduction in untimely processing (under measure C.2.b.5), as well as added new capability to track the time required to provide approved accommodations (a Part J measure of effectiveness).			

Source of the Trigger:	Other				
Specific Workforce Data Table:	Workforce Data Table - B1				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Untimely conversions of eligible Schedule A(u) hires from the excepted service to the competitive service.				
STATEMENT OF BARRIER GROUPS:	Barrier Group People with Disabilities People with Targeted Disabilities				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name Untimely Schedule A(u) Conversions		Description of Policy, Procedure, or Practice More than 40 Schedule A(u) hires had been satisfactorily employed by GSA for longer than two years, but had not been converted to the competitive service.		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
05/17/2021	09/30/2021	Yes	09/30/2024		Timely convert all eligible Schedule A(u) employees from excepted to competitive service, or provide narrative reasons for not converting all eligible Schedule A(u) employees, for inclusion in Part J of the MD-715 report.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Chief Human Capital Officer		Arron Helm		Yes	
EEO Director		Aluanda Drain		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/29/2023	Develop and implement policy and procedures to (1) timely convert eligible Schedule A(u) employees from the excepted to the competitive service and/or (2) to timely provide narrative reasons (for inclusion in Part J of the MD-715 report) for not converting all eligible Schedule A(u) employees, if any.	Yes	04/12/2024	
04/26/2024	Upon completion of the first planned activity, update this Part H plan with relevant milestone activities, target dates, and a planned completion date for accomplishing the objective.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2023	In March, 2023, GSA established guidelines for hiring candidates with disabilities under the excepted service authority, 5 CFR § 213.3102(u), regarding persons with intellectual disabilities, severe physical disabilities, or psychiatric disabilities.			

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - B1				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Analysis of employee data beyond the MD-715 tables identified that many employees appear to be in temporary status in excess of specified limits for temporary employment.				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities				
Barrier Analysis Process Completed?:	N				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name Employees in temporary status beyond specified timeframes.		Description of Policy, Procedure, or Practice Analysis of employee data beyond the MD-715 tables identified that many employees appear to be in temporary status in excess of specified limits for temporary employment.		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
04/30/2023	09/29/2023	Yes	09/30/0024		Ensure that (1) all temporary/permanent status indicators are correct, (2) employees do not remain in temporary status longer than allowed, (3) excepted service hires in temporary status under 5 CFR § 213.3102(u)(5)(i) (i.e., to observe the applicant on the job to determine whether the applicant is able to perform the duties of the position) are converted to permanent status in the excepted service as soon as practicable after the individual is found able to perform the duties of the position.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Chief Human Capital Officer		Arron Helm		Yes	
EEO Director		Aluanda Drain		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/17/2023	OCR and OHRM to meet to analyze current employee data for employees currently in non-permanent status in HRLinks to identify (1) potential accuracy issues with temporary/permanent status data elements in HRLinks and (2) employees who appear to be in temporary status beyond the expected timeframes of their respective appointment authorities.	Yes	04/17/2024	
06/12/2024	OCR and OHRM to meet to analyze current employee data for employees currently in non-permanent status in HRLinks to identify (1) Schedule A(u) employees with appointment authority codes WTA, WTB, WTM, and WUM; (2) former Schedule A(u) employees converted to the Competitive service under appointment authority code L1M; and (3) former Schedule A(u) employees converted in FY22 or later to the Competitive service under any appointment authority code other than L1M. For non-permanent employees in authorities WTA, WTB, WTM, and WUM, identify whether they are in temporary status because (a) the nature of work is temporary (in accordance with 5 CFR § 213.3102(u)(5)(ii)) and/or (b) the agency determined that it was necessary to observe the applicant on the job to determine whether the applicant is able or ready to perform the duties of the position (per 5 CFR § 213.3102(u)(5)(i)), and if so, if they are now eligible for conversion to permanent status in the Excepted service.	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.

Significant progress was made in FY23 on the barriers related to reasonable accommodations and Schedule A(u), and the progress made on Schedule A(u) will have secondary benefits to the barrier related to employees in temporary status. The barrier in which the least apparent progress was made was implementation of the AAP for PWD; however, the reasons for that progress were primarily related to extensive efforts that were made during FY23 to address critical deficiencies that impact barrier analysis, the disability program, and the AAP for PWD. Now that the majority of those deficiencies have been resolved, further progress on eliminating the four barriers is now a primary FY24 focus area.

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

GSA previously identified four barriers related to persons with disabilities: 1. Untimely processing of requests for disability-related reasonable accommodations; 2. Untimely conversion of employees hired under the Schedule A(u) appointment authority; 3. Employees in non-permanent positions for extended durations; 4. Insufficient collaboration on implementation of the Affirmative Action Plan for PWD. Of those four barriers, notable progress was made on the first two in FY 2024 and progress was made on the third barrier during early FY 2025, after the end of the FY 2024 reporting period, but prior to the submission of the FY 2024 report. The fourth barrier was eliminated altogether.

- 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.

All plans are still active, and will be modified as necessary to address new information.