

## **Federal Agency Annual EEO Program Status Report (MD-715 Report)**

The fiscal year 2021 (FY21) Federal Agency Annual EEO Status Report (MD-715 Report) was compiled in accordance with the Equal Employment Opportunity Commission (EEOC) *Instructions to Federal Agencies for EEO MD-715*.

The MD-715 Report serves two main purposes:

1. It provides the EEOC with information necessary for them to provide oversight and guidance.
2. It provides GSA leaders a snapshot of the agency's status and progress toward meeting its equal employment opportunity (EEO) obligations, including compliance with EEO laws and regulations, barrier analysis efforts, and corrective actions undertaken to resolve identified deficiencies.

The EEOC report template contains 10 Parts (labeled A through J), as well as mandatory employee and applicant data tables. Each Part contains specified information, so that the collective report identifies:

1. The organizational and demographic composition of the agency
2. Key personnel responsible for EEO matters and relevant non-EEO programs
3. The status of the agency's compliance with EEO laws, regulations, and EEOC guidance
4. Agency plans and progress toward eliminating identified compliance deficiencies
5. Barriers to EEO identified through analysis of MD-715 tables and other sources of information
6. Agency efforts to recruit, hire, advance, and retain people with disabilities

The MD-715 Report tables are designed solely to support EEO barrier analysis. At the end of each year, specified demographic data (on race, national origin, sex, and disability status) is compiled and compared to designated EEOC benchmarks. Significant anomalies are investigated to determine their root causes, and if any root causes are determined to be barriers to EEO, plans are developed and executed to eliminate all barriers that are not job-related and consistent with business necessity.

All Federal agencies are required to establish numerical goals for hiring, advancement, and retention of people with disabilities, and to take specific steps that are reasonably designed to achieve those goals. Part J of the report covers those efforts in greater detail.

MD-715 does not address any diversity goals related to race, national origin, or sex; however, the Affirmative Employment Program (AEP) collaborates closely to support the efforts of GSA's Diversity, Equity, Inclusion, and Accessibility (DEIA) teams, Special Emphasis Programs, and affinity groups.

# Equal Employment Opportunity Program Status Report for Fiscal Year 2021



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## EEOC MD-715 Overview

This Equal Employment Opportunity (EEO) Program Status Report for fiscal year 2021 (FY21) is prepared and submitted in accordance with Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715), EEOC's accompanying *Instructions to Federal Agencies for EEO MD-715*,<sup>1</sup> and related EEOC guidance. Per MD-715, "The overriding objective of this directive is to ensure that all employees and applicants for employment enjoy equality of opportunity in the federal workplace regardless of race, sex, national origin, color, religion, disability, or reprisal for engaging in prior protected activity."<sup>2</sup> Consistent with this objective, MD-715 requires the U.S. General Services Administration (GSA) to:

- Accurately execute the comprehensive assessment checklist in Part G of the report, on at least an annual basis, to evaluate the GSA's compliance with various EEO laws, regulations, and other directives, using EEOC's prescribed measures and standards.
- When areas of non-compliance (deficiencies) are identified, MD-715 requires GSA to designate responsible officials and develop and implement relevant corrective plans that show meaningful progress toward resolving the deficiencies (Part H of the report).
- Proactively and systematically identify any institutional, structural, attitudinal, and/or physical barriers that may operate to exclude certain protected groups, and to develop and execute strategic plans to eliminate any identified barriers (Part I of the report).
- Develop and implement a "Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities" (known as the Affirmative Action Plan for Persons with Disabilities) (Part J of the report).

This EEO Program Status Report (MD-715 report) reflects the results of GSA's efforts throughout FY21. The structure, format, and content of this report are prescribed by the EEOC, including Parts A thru J, data tables A-1 thru B-9, and all supplemental documents (e.g., reasonable accommodations procedures, organizational chart, and EEO policy statement).

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<sup>1</sup> See EEOC MD-715 (Oct. 1, 2003) at <https://www.eeoc.gov/federal-sector/management-directive/section-717-title-vii> and Instructions to Federal Agencies for EEO MD-715 at <https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eeo-md-715>. Per EEOC's federal-sector regulations at 29 C.F.R. § Part 1614, MD-715 is binding on all Executive agencies (including GSA). See 29 C.F.R. § 1614.103(b)(2) ("This part applies to . . . Executive agencies as defined in 5 U.S.C. 105"); see also 29 C.F.R. § 1614.102(e) ("Agency programs *shall* comply with this part and the Management Directives and Bulletins that the Commission issues.") (emphasis added).

<sup>2</sup> MD-715, Policy Intent.

## FY21 MD-715 Report Overview

This report is a comprehensive assessment of GSA's regulatory compliance and progress on mandatory activities, including correction of previously identified deficiencies and execution of barrier analyses and affirmative actions to improve participation of persons with disabilities. Reporting requirements, including structure, format, and content are dictated by the EEOC's *Instructions to Federal Agencies* and Federal Sector EEO Portal reporting interface. The report is intended as a snapshot on the status of critical activities to be executed throughout the year.

Of 156 regulatory requirements assessed in Part G of the report, GSA did not comply with 30 interrelated obligations, leading to reportable agency deficiencies for FY21 associated with:

- Timely processing of reasonable accommodations requests and harassment allegations
- Collaboration of non-EEO programs on barrier analyses, implementation of the Affirmative Action Plan for Persons with Disabilities, and preparation of this report
- Systems and data on employees, applicants, recruitment activities, and processing of requests for reasonable accommodations and allegations of harassment
- Compliance with EEO regulations that require all supervisors and managers to receive training on anti-harassment, reasonable accommodations, EEO complaints, alternative dispute resolution, and effective supervisory communications and interpersonal skills
- Specific EEO-related communications (e.g., within the agency strategic plan, within the agency exit survey, and posted on publicly accessible websites)

Part H includes 27 corrective plans that identify appropriate responsible officials, objectives, and planned activities necessary to systematically address each of the 30 identified deficiencies.

Part E is an executive summary that includes an analysis of data tables A-1 thru B-9 and other sources of information. Mandatory analyses are conducted at least annually to identify areas of potential discrimination to be investigated during the upcoming year, as part of ongoing barrier investigations. Part I addresses plans to eliminate barriers relating to race, ethnicity, and sex.

Part J addresses elimination of barriers affecting persons with disabilities. Part J also outlines agency Affirmative Action Plan responsibilities regarding (a) recruitment, (b) hiring, (c) advancement, and (d) retention of persons with disabilities and targeted disabilities.

## Part A – Agency Identifying Information

**TABLE 1:** Agency Identifying Information

<b>Agency identifying information</b>	
1. Agency	U.S. General Services Administration (GSA)
2. Address	1800 F Street, NW
3. City, State, Zip code	Washington, D.C. 20006
4. Agency Code	GS00
5. FIPS Code	4177

## Part B – Total Employment

FIGURE 1: GSA Total Employment<sup>3</sup>

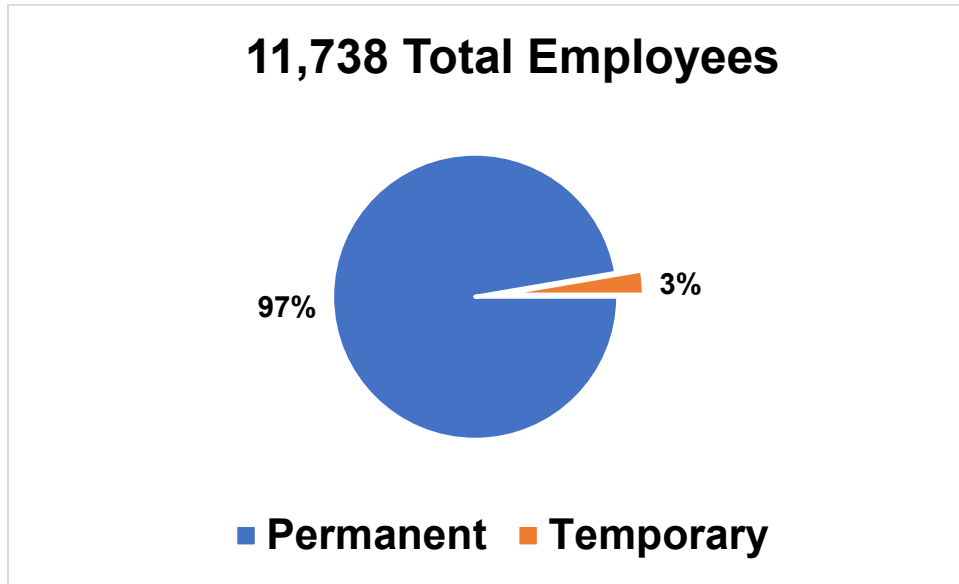
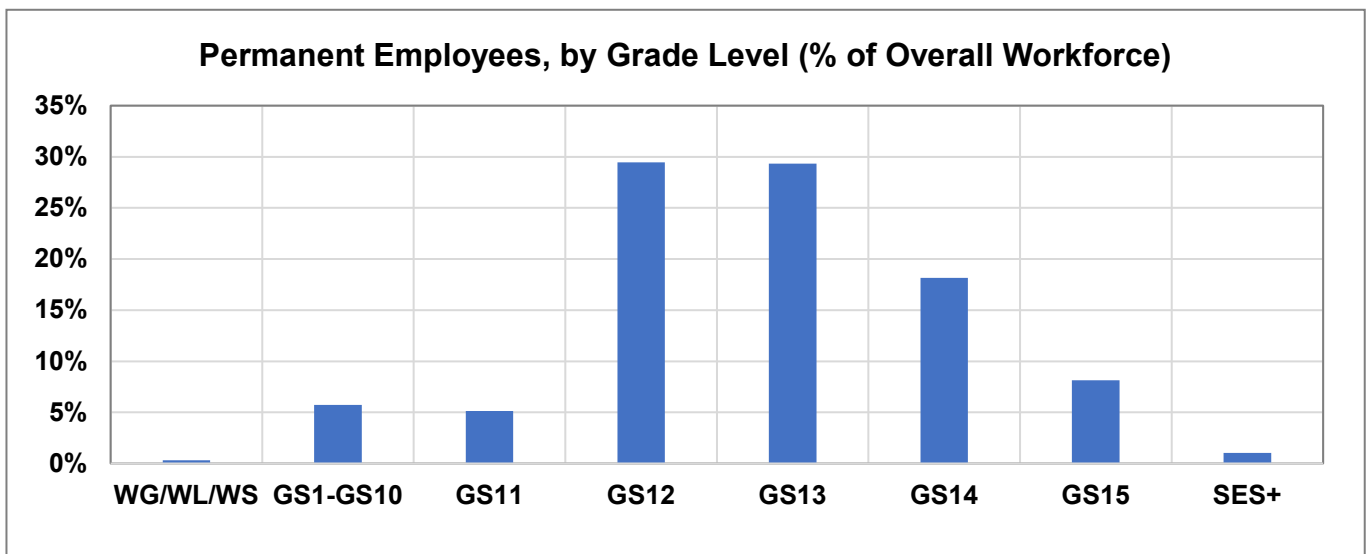


FIGURE 2: Distribution of Permanent Employees, by Grade Level<sup>4</sup>



<sup>3</sup> Data as of September 30, 2021.

<sup>4</sup> In this figure, the SES+ category includes ES, EX, SL, and CA (i.e., all non-GS/WG/WL/WS) positions.

## Part C – Officials Responsible for Oversight of EEO-Related Programs

**TABLE 2:** GSA Responsible Officials

Title Type	Name	Title	Pay Plan, Series, Grade	Phone Number	Email Address
Head of Agency	Robin Carnahan	Administrator	EX-0340-III	202-501-2472	robin.carnahan@gsa.gov
Principal EEO Director/Official	Aluanda Drain	Associate Administrator, OCR	ES-0343-1	202-501-0767	aluanda.drain@gsa.gov
Affirmative Employment Program Manager	Paul Boinay	Affirmative Employment Program Manager	GS-0260-14	202-710-7346	paul.boinay@gsa.gov
Complaint Processing Program Manager	Sylvia Anderson	EEO Manager	GS-0260-14	215-446-4967	sylvia.anderson@gsa.gov
Diversity & Inclusion Officer	Lance Green	D&I Program Manager	GS-0201-14	202-313-7713	lance.green@gsa.gov
Hispanic Employment Co-Program Manager (SEPM)	Edgar Delgado	FEB Program Manager	GS-0301-14	312-502-9424	edgar.delgado@gsa.gov
Hispanic Employment Co-Program Manager (SEPM)	Jeanette Lopez-Torralba	Program Management Specialist	GS-0343-13	312-502-1102	jeanette.lopez-torralba@gsa.gov
Federal Women's Program Manager (SEPM)	Ling Xu	Management and Program Analyst	GS-0343-14	212-264-8307	ling.xu@gsa.gov
Persons with Disabilities (PWD) Co-Program Manager (SEPM)	Hayden Shock	Program Analyst	GS-0343-11	571-365-6927 (text only)	hayden.shock@gsa.gov
Persons with Disabilities (PWD) Co-Program Manager (SEPM)	John Bagwell	Program Specialist	GS-0301-12	404-861-0590	john.bagwell@gsa.gov
Special Placement Coordinator (PWD)	Lance Green	D&I Program Manager	GS-0201-14	202-313-7713	lance.green@gsa.gov
Reasonable Accommodation Program Manager (OHRM)	Emily Claybrook	Human Resources Specialist	GS-0201-14	202-754-2273	emily.plank@gsa.gov
Reasonable Accommodation Program Manager (OIG)	Christopher Edwards	Employee Relations Officer	GS-0201-14	202-273-7387	christopher.edwards@gsaig.gov
Anti-Harassment Program Manager	Alexandra Vernacchio	Supervisory Human Resources Specialist	GS-0201-15	215-292-0780	alexandra.vernacchio@gsa.gov
Alternative Dispute Resolution Program Manager	Kellyann Williams	Senior EEO Specialist	GS-0260-14	215-446-4906	kellyann.williams@gsa.gov
Compliance Manager	Jennifer Jusseaume	EEO Manager	GS-0260-14	617-834-5528	jennifer.jusseaume@gsa.gov
Principal MD-715 Preparer	Paul Boinay	Affirmative Employment Program Manager	GS-0260-14	202-710-7346	paul.boinay@gsa.gov
Other EEO Staff	Darlene Thompson	Director, Mission Delivery Office	GS-0260-15	202-808-4394	darlene.thompson@gsa.gov
Other EEO Staff	Shannon Klonecki	Management and Program Analyst	GS-0343-13	202-394-2913	shannon.klonecki@gsa.gov



## Part D – List of Subordinate Components

GSA is comprised of the Office of the Administrator, which oversees twelve Staff Offices (including the Office of Civil Rights), two Services, two independent Offices, and eleven geographically aligned Regions. GSA organizational components include the following:

### **Staff Offices:**

- Office of Government-wide Policy
- Office of Chief Financial Officer
- Office of GSA Information Technology
- Office of Human Resources Management
- Office of the General Counsel
- Office of Customer Experience
- Office of Strategic Communication
- Office of Small & Disadvantaged Business Utilization
- **Office of Civil Rights**
- Office of Mission Assurance
- Office of Congressional & Intergovernmental Affairs
- Office of Administrative Services

### **Services:**

- Federal Acquisition Service
- Public Buildings Service

### **Independent Offices:**

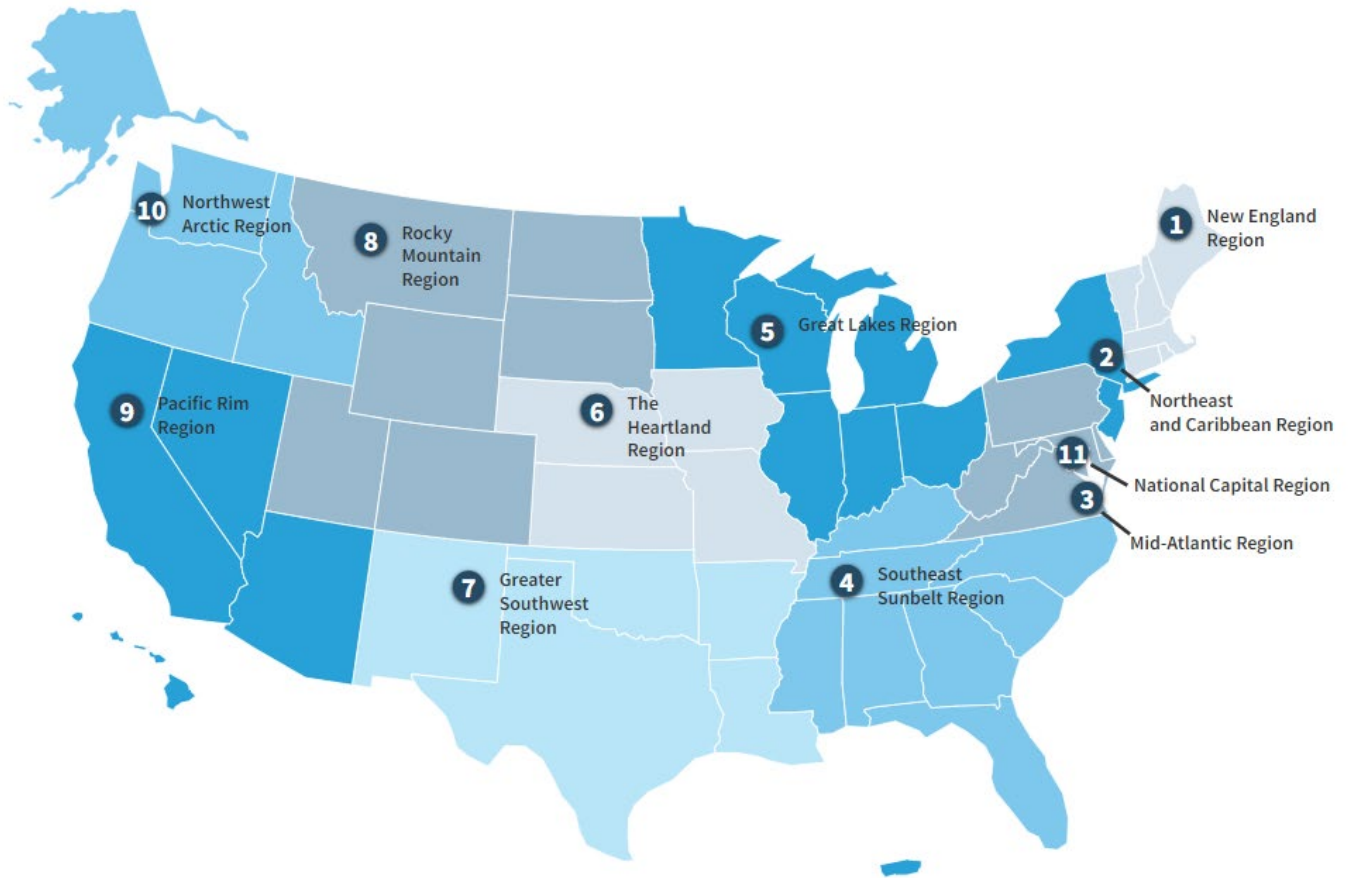
- Office of the Inspector General
- Civilian Board of Contract Appeals

### **Regions:**

- Region 1 – New England
- Region 2 – Northeast & Caribbean
- Region 3 – Mid-Atlantic
- Region 4 – Southeast Sunbelt
- Region 5 – Great Lakes
- Region 6 – Heartland
- Region 7 – Greater Southwest
- Region 8 – Rocky Mountain
- Region 9 – Pacific Rim
- Region 10 – Northwest/Arctic
- Region 11 – National Capital

GSA regions are displayed in Figure 3 on the following page.

**FIGURE 3:** GSA Regions



## Part E – Executive Summary

Per the Equal Employment Opportunity Commission (EEOC) *Instructions to Federal Agencies for EEO MD-715* (hereafter EEOC Instructions), “the purpose of this executive summary is to alert all managers and supervisors of their responsibilities regarding the status of the agency’s EEO program.”<sup>5</sup> This is to ensure their understanding of both (1) the agency’s overall EEO program direction and (2) the expected contributions necessary for the agency to become a model employer. The content and format of this executive summary are directed by the EEOC. They are intended to provide a quick and informative review of all EEO-related deficiencies that have been identified during the previous fiscal year(s), as well as corrective actions planned to be taken during the current or subsequent fiscal year(s). Additionally, the executive summary discusses barrier analysis efforts undertaken during the past year, as well associated findings and plans to mitigate or eliminate any EEO barriers that were identified.

In accordance with the EEOC Instructions, this executive summary contains ten mandatory sections (labeled Part E.1 through Part E.10) that provide brief narrative descriptions of:

- The agency’s mission and mission-related functions (Part E.1).
- Weaknesses (e.g., compliance deficiencies) and strengths (e.g., leading practices) of the agency relating to fulfillment of its EEO-related obligations, evaluated against relevant measures and performance standards associated with the EEOC’s “Six Essential Elements of a Model EEO Program” (Parts E.2 – E.7).
- Accomplishments and activities undertaken directly connected to (a) the annual compliance assessment (including efforts to identify and correct program deficiencies) and (b) MD-715 analyses (including trigger<sup>6</sup> identification, barrier<sup>7</sup> investigation, and the elimination or mitigation of EEO barriers (when identified)); as well as (c) efforts to correct information or data gaps, if any, that prevent effective analysis and/or assessment) (Parts E.8 and E.9).
- Action items and plans to be implemented during the upcoming year (Part E.10).

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<sup>5</sup> See EEOC Instructions, at III.E (Reporting and Line by Line Instructions for Executive Summary).

<sup>6</sup> Triggers are “red flags” that indicate the possible presence of a discriminatory barrier (see Footnote 7, below). Agencies are required to identify triggers using workforce data, applicant data, climate survey results, exit surveys, EEO complaints, allegations of harassment, grievances, and other mandatory sources of information.

<sup>7</sup> A barrier is an agency policy, procedure, practice, or condition that tends to limit employment opportunities for a particular group, based on sex, race, ethnic background, or disability status.

## Important Notes about EEO, DEIA, & MD-715 Obligations:

EEO is distinctly separate from the diversity, equity, inclusion, and accessibility (DEIA) program. EEO focuses on preventing and addressing discrimination toward employees and applicants for employment, as well as on developing and implementing lawful affirmative actions specifically designed to (a) recruit, (b) hire, (c) advance, and (d) retain persons with disabilities. Aspects of EEO therefore touch on accessibility, and its goal of eliminating discrimination also tends to improve inclusion; however, EEO is not focused on achieving outcomes related to diversity demographics. The EEO program routinely compiles, analyzes, and reports demographic data related to race, ethnicity/national origin, and sex/gender; however, there are no EEO-related diversity goals or associated representation targets related to any of those group characteristics.<sup>8</sup>

Equality and equity are also different. The specific, objective requirements of equal employment opportunity programs are rooted in laws and regulations dating back decades, and have been further refined by EEOC directives, guidance, and instructions, which include explicit standards, measures, and procedures. In contrast, DEIA is a relatively new concept within the federal government. The June 25, 2021 Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce<sup>9</sup> lays the groundwork; however, standards of success, data-related requirements, implementation strategies, and reporting obligations associated with DEIA are still being refined. Executive Order 14035 requires agency heads to “seek opportunities to establish a position of chief diversity officer or diversity and inclusion officer (distinct from an *equal employment opportunity officer*), with sufficient seniority to coordinate efforts to promote diversity, equity, inclusion, and accessibility within the agency.” It also requires that the Government-wide DEIA plan “promote a data-driven approach to increase transparency and accountability, *which would build upon, as appropriate, the EEOC’s Management Directive 715 reporting process.*”

It is therefore important that GSA’s EEO-related performance be assessed against the explicit procedures, measures, standards, and reporting criteria directed by MD-715 and the EEOC Instructions, and to specifically not consider efforts spent on DEIA activities to be synonymous with fulfilling the agency’s distinctly separate and exhaustively codified EEO-related obligations.

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<sup>8</sup> 5 U.S.C. § 2302(b) prohibits agencies from discriminating *for or against* any employee or applicant for employment on the basis of race, national origin, or sex (as well as on the basis of color, religion, age, handicapping condition, marital status, or political affiliation) (emphasis added).

<sup>9</sup> See <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/25/executive-order-on-diversity-equity-inclusion-and-accessibility-in-the-federal-workforce/>

## E.1. Mission of GSA & EEO Program

### Purpose and Structure of GSA

The mission of the U.S. General Services Administration (GSA) is to deliver the best value in real estate, acquisition, and technology services to the government and ultimately save money for the American taxpayer. GSA's four strategic goals - savings, efficiency, technology modernization, and shared services - align the agency's mission, set direction, and guide operational planning.

GSA's two main lines of business are the Federal Acquisition Service and the Public Buildings Service. Twelve staff offices (including the Office of Civil Rights) and two independent offices support GSA's operations and eleven regional offices serve federal customers nationwide.

GSA is the government landlord, creating a 21st century workplace across government to drive down costs and increase productivity. GSA is also the premier source for equipment, supplies, telecommunications, and integrated information technology to federal agencies. GSA has an annual contract volume of over \$60 billion, manages over 200,000 fleet vehicles, assists tens of thousands of federal travelers through GSA's electronic travel system, and serves as the focal point for data, information, and services offered by the federal government to its citizens. Approximately 11,700 employees provide valuable support to other federal agencies and the general public.

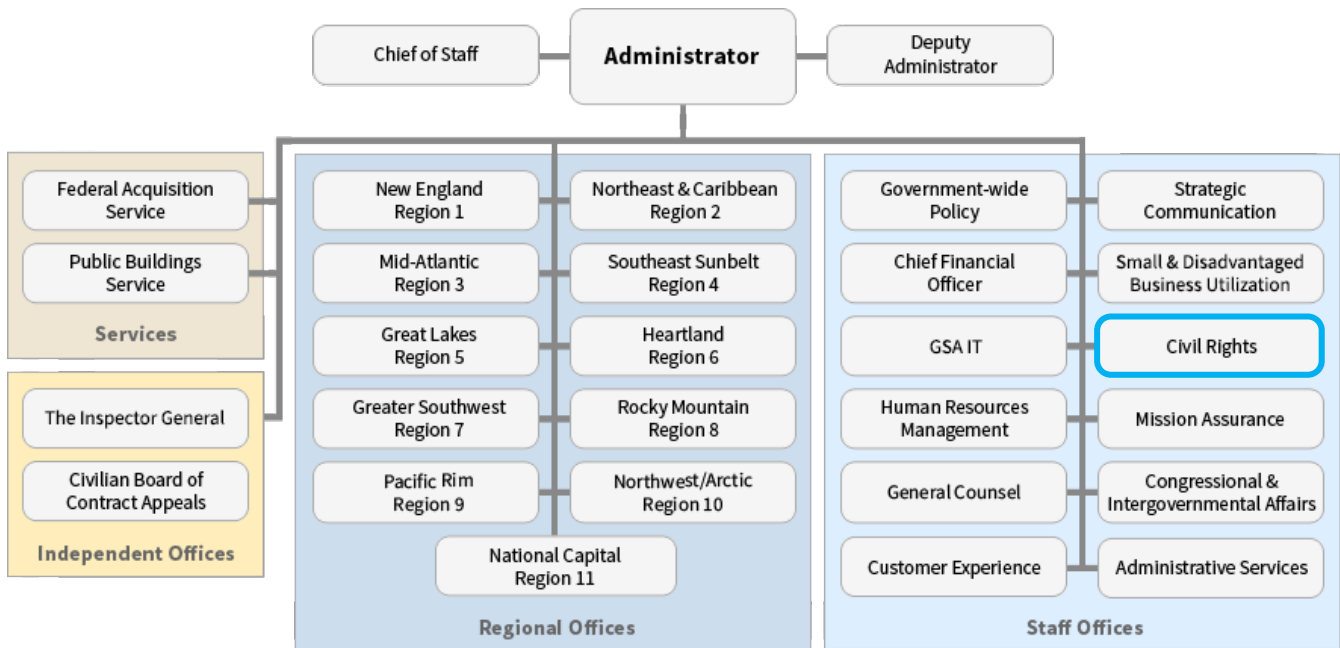
GSA is an Executive agency (as defined in 5 U.S.C. § 105).

The current GSA organizational chart is shown on the next page, in Figure 4, and is also available on GSA's public website at <https://www.gsa.gov/about-us/gsa-organization>. The GSA's principal EEO official (the Associate Administrator, Office of Civil Rights) reports directly to the agency head (GSA Administrator)<sup>10</sup>.

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<sup>10</sup> In accordance with 29 C.F.R. § 1614.102(b)(4).

**FIGURE 4:** GSA Organization Chart



## GSA's EEO Program

GSA's EEO Program formally resides within the Office of Civil Rights (OCR); however, EEO is in an agency-wide responsibility. EEO obligations extend well beyond OCR, to GSA's senior leaders, lower-level managers and supervisors, as well as to other programs, in particular the Office of Human Resources Management (OHRM). Those obligations require all parties to not only engage and collaborate in the execution of key functions spearheaded by OCR, such as development of this Agency EEO Program Status (MD-715) Report, but also to effectively support EEO through their independent efforts within their respective areas of responsibility.

OCR carries out functions required by Title VII of the Civil Rights Act of 1964 (Title VII), Section 501 of the Rehabilitation Act of 1973 (Rehabilitation Act), and the EEOC's federal-sector regulations at 29 C.F.R. § Part 1614, as well as EEOC Management Directive 110<sup>11</sup> and MD-715.

OCR is comprised of five discrete civil rights program components:

- Equal Employment Opportunity, which focuses on compliance with anti-discrimination laws, regulations, policies, and guidance and processing complaints of discrimination.
- The Affirmative Employment Program (AEP), which focuses on mandatory activities designed to address unreported discrimination and proactively prevent discrimination (i.e., implementation of EEOC MD-715, EEOC Instructions, and related guidance).
- The Nondiscrimination in Federally Conducted Programs and Activities program for federal tenants and their employees, as well as members of the general public seeking access to programs and activities conducted by GSA.
- Environmental Justice ensures fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to development, implementation, and enforcement of environmental laws, regulations, and policies.
- The Nondiscrimination in Federally Assisted Programs and Activities program for people eligible to participate in programs or activities that receive federal financial assistance from GSA.

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<sup>11</sup> See EEOC MD-110 (Aug. 5, 2015), at <https://www.eeoc.gov/federal/directives/md110.cfm>.

## The Six Essential Elements of Model EEO Programs: GSA Self-Assessment and Action Items

OCR, in partnership with and through other GSA stakeholders, adheres to and promotes the six elements identified by the EEOC in MD-715 as essential for model EEO programs under Title VII<sup>12</sup> and the Rehabilitation Act<sup>13</sup>. The six essential elements<sup>14</sup> are identified by letters A thru F:

- A. Demonstrated commitment from agency leadership
- B. Integration of EEO into the agency's strategic mission
- C. Management and program accountability
- D. Proactive prevention of unlawful discrimination
- E. Efficiency
- F. Responsiveness and legal compliance

To gauge each agency's status in attaining and maintaining a model EEO program<sup>15</sup>, the EEOC requires completion of the Part G Self-Assessment Checklist.<sup>16</sup> Containing 156 relevant metrics, the checklist outlines "a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715" and one that "permits EEO Directors to...highlight for their senior staff, deficiencies ... that the agency must address to comply with MD-715's requirements."

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<sup>12</sup> 42 U.S.C. § 2000e et seq.

<sup>13</sup> 29 U.S.C. § 791 and the Americans with Disabilities Act Amendments Act of 2008 (Pub. L. 110-325).

<sup>14</sup> See MD-715, at Section II; see also EEOC Instructions, at Section I.

<sup>15</sup> In this context, "EEO program" includes all responsibilities, agency-wide, related to and/or supporting EEO, including not only obligations of the Office of Civil Rights' EEO and Affirmative Employment Programs, but also the responsibilities of all agency leaders, managers, supervisors, and programs.

<sup>16</sup> <https://www.eeoc.gov/federal-sector/management-directive/md-715-part-g-agency-self-assessment-checklist>.



## Important Notes about the Part G Compliance Assessment:

Agencies are required to comply with all EEO laws and regulations, as well as with EEOC guidance and instructions. As such, any non-compliance is a reportable deficiency.

The compliance standard for all objective measures is 100%. As such, any instance where an obligation is not fully met is considered a reportable deficiency, even if the general performance is otherwise strong. For example, of GSA's 1,739 managers and supervisors, 1,737 (99.88%) were compliant with EEO training requirements at the end of FY21. In spite of having only two supervisors who did not fulfill their requirements, the overall performance of the agency fell short of the EEOC's 100% standard, so it must report a deficiency in FY21 for this measure.

The Part G checklist comprehensively assesses compliance by evaluating different aspects of EEO requirements using multiple measures within separate essential elements, each focused on a particular EEO obligation. As a result, the same topic (e.g., employee data, reasonable accommodation, anti-harassment) will often appear in different elements in various contexts.

Part G measures are labeled with a letter indicating the essential element, followed by a series of numbers and letters identifying the specific measure. For example, A.1.a pertains to essential element A and measure 1.a (issuance of an annual EEO policy statement by the agency head).

The current version of the Part G checklist was first introduced in FY18 and made significant changes to the previous assessment checklist. It removed many less effective compliance measures, replaced subjective assessment questions with more objective measures, raised the standard of compliance to 100%, and introduced 85 new assessment measures. Collectively, the changes increased the total number of compliance measures from 121 to 156.

The many changes and improvements introduced in the FY18 checklist made implementation of the revised assessment challenging for most agencies. During GSA's first three years of using the checklist (FY18, FY19, and FY20), GSA did not have staff members with experience or training on effective use of the new compliance measures, resulting in under-reporting of GSA deficiencies throughout that period. During FY21, GSA hired additional trained staff and was thus able to execute a more comprehensive self-assessment than those formerly conducted, resulting in the identification of considerably more deficiencies in FY21 than reported in the past three years (e.g., thirty deficiencies are identified for FY21, compared to six in FY20, ten in FY19, and twelve in FY18). FY21 deficiencies are described in detail in the sections below.

## E.2 - Essential Element A: Demonstrated Commitment from Agency Leadership

MD-715 requires agency heads and other senior management officials to demonstrate a firm commitment to equality of opportunity for all employees and applicants for employment.<sup>17</sup>

Relevant measures assess the agency head's EEO policy statement, agency communications and recognition mechanisms relating to EEO, and how effectively the agency ensures that EEO principles are instilled into its culture. Per MD-715:

“Agencies must translate equal opportunity into everyday practice and make those principles a fundamental part of agency culture. This commitment to equal opportunity must be embraced by agency leadership and communicated through the ranks from the top down. It is the responsibility of each agency head to take such measures as may be necessary to incorporate the principles of equal employment opportunity into the agency's organizational structure. To this end, agency heads must issue a written policy statement expressing their commitment to equal employment opportunity (EEO) and a workplace free of discriminatory harassment.”<sup>18</sup>

During FY21, GSA leadership demonstrated commitment to EEO through several actions associated with the measures under this essential element:

- A GSA Equity Team was established in January 2021, and in May 2021, the Equity Team introduced a new blog series to expand agency-wide communications relating to Diversity, Equity, Inclusion, and Accessibility (DEIA). Encouraging participation and leadership at all levels, the series also addressed identifying and eliminating barriers.
- In June 2021, GSA appointed a full-time Senior Advisor to the Administrator on Equity.
- The new GSA Administrator was sworn in on July 2, 2021 and issued a compliant EEO policy statement on October 1, 2021.

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<sup>17</sup> This MD-715 mandate reinforces statutory requirements. See 42 U.S.C. § 2000e-16(e) (emphasizing the “primary responsibility” of agency heads “to assure nondiscrimination in employment as required by the Constitution and statutes” and his or her “responsibilities under Executive Order 11478 relating to equal employment opportunity in the Federal Government”).

<sup>18</sup> See MD-715, II.A. Essential Elements of Model Agency Title VII and Rehabilitation Act Programs.

- Beyond mandating formal training for supervisors and managers, GSA requires all employees to regularly receive comprehensive training covering all EEO topics addressed within the Part G self-assessment. At the end of FY21, 99.98% of employees had received that training within 90 days of accession and every two years thereafter.
- GSA monitors workforce perceptions through participation in the annual Federal Employee Viewpoint Survey (FEVS), where GSA’s employee response rate in the 2020<sup>19</sup> FEVS was the second highest among all comparable<sup>20</sup> agencies Government-wide. Overall GSA Employee Engagement Index (EEI)<sup>21</sup> scores increased 5% over 2019 and remain higher than the Government-wide averages, both overall and within each of the three individual EEI subfactors.<sup>22</sup>
- One action that would improve performance in this element would be to formalize and broaden GSA’s mechanisms for recognizing employees, supervisors, managers, and organizational subcomponents for superior accomplishments in equal employment opportunity.

The only Part G self-assessment deficiency in this element is that business contact information for GSA’s Special Emphasis Program<sup>23</sup> Managers (SEPM) is not posted on GSA’s *public* website.<sup>24</sup>

A.2.b.1  
 SEPM Contact Info (PWDP/FWP/HEP) is Posted on Public Web

<sup>19</sup> The 2020 FEVS was administered September 16, 2020 through October 28, 2020, and its results were released in FY21. The 2021 FEVS cycle was not administered until after the end of FY21.

<sup>20</sup> GSA is included among “large” agencies (those with 10,000 to 74,999 employees).

<sup>21</sup> See Office of Personnel Management 2020 FEVS Governmentwide Management Report - Creating an Engaging Agency Culture: Understanding the Employee Engagement Index at: <https://www.opm.gov/fevs/reports/governmentwide-reports/governmentwide-management-report/governmentwide-report/2020/2020-governmentwide-management-report.pdf>

<sup>22</sup> EEI subfactors include (a) Leaders Lead, (b) Supervisor, and (c) Intrinsic Work Experience.

<sup>23</sup> Mandatory Special Emphasis Programs (SEPs) include the Federal Women’s Program (FWP), Hispanic Employment Program (HEP), and Persons with Disabilities Program (PWDP or PWD SEP).

<sup>24</sup> In its full form (as written in the Part G self-assessment checklist), the relevant EEOC measure (A.2.b.1) reads “*Does the agency prominently post the following information throughout the workplace and on its public website: The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)].*” Within this executive summary, relevant measures are paraphrased, and also depicted within a graphic on the right side, similar to the one above, along with the associated compliance measure identifier. At the conclusion of section E.7, Figure 5 consolidates and depicts all FY21 deficiencies collectively.

### E.3. Essential Element B: Integration of EEO into Agency's Strategic Mission

EEOC Instructions state that “to ensure that federal agencies achieve their goal of being a model workplace, all managers and employees must view EEO as an integral part of the agency’s strategic mission. The success of the agency’s EEO program ultimately depends on decisions made by individual managers.”<sup>25</sup> In accordance with this element<sup>26</sup>, the agency must:

- Maintain a reporting structure that provides the principal EEO official with regular access to the agency head and other senior management officials for reporting on the effectiveness, efficiency, and legal compliance of the agency’s Title VII and Rehabilitation Act programs.
- Ensure that EEO professionals are involved with, and consulted on, management and personnel actions, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development programs.
- Allocate sufficient funding and qualified staffing to support the success of the EEO efforts, not only within OCR, but throughout the agency, including adequate resources to execute:
  - Core EEO functions (including EEO complaints processing, annual compliance assessments, barrier analyses, and EEO training).
  - Critical related programs (including the Anti-Harassment Program, Reasonable Accommodations Program, and mandatory Special Emphasis Programs).
  - Effective data collection and tracking systems (including systems for managing and analyzing workforce employment lifecycle demographics, applicant flow data, EEO complaints, allegations of harassment, and requests for reasonable accommodations).
- Ensure that all (100%) of agency managers and supervisors receive training on their responsibilities relating to all of the following topics: (a) reasonable accommodations, (b) anti-harassment, (c) EEO complaints, (d) alternative dispute resolution, and (e) effective supervisory/managerial communications and interpersonal skills.
- Ensure that senior managers participate in barrier analysis, implementation of Special Emphasis Programs, and development and implementation of EEO-related action plans.

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<sup>25</sup> See EEOC Instructions, Section I.II.

<sup>26</sup> See MD-715, Model Agency Title VII and Rehabilitation Act Programs, at Section II.B.

Additionally, this element requires that the importance of EEO to the agency’s mission be emphasized, not only by placing the principal EEO official under the immediate supervision of the head of the agency<sup>27</sup>, but also by clearly depicting that reporting relationship on the agency’s organizational chart and by incorporating EEO principles into the agency’s strategic plan.

GSA supports this element through its compliant reporting structure, integration of EEO into its strategic decision-making, and through resourcing of core EEO functions residing within OCR (e.g., complaints processing and the Affirmative Employment Program). Additionally, the GSA organizational chart was updated in FY22 to accurately depict the EEO office reporting structure (correcting a deficiency identified and reported in FY19 and FY20). There are, however, several areas within this element that require improvement in order to become compliant:

- The GSA strategic plan does not reference EEO principles (a deficiency reported in FY20). In March, 2022, DEIA principals were added to the GSA’s FY 2022-2026 Strategic Plan; however, no EEO principals (e.g., non-discrimination, barrier elimination, affirmative actions for persons with disabilities) were included.
- As noted previously, during GSA’s previous three years of using the EEOC’s 2017 revision of the Part G checklist (FY18, FY19, and FY20), GSA did not have staff members with experience or training on the new compliance measures, resulting in limited awareness of several ongoing deficiencies now being identified in this MD-715 report. As a result of that lack of awareness, as well as other factors, several relevant programs and functions that reside outside of OCR were ultimately unable to adequately support execution of the FY21 EEO program, adversely impacting performance of many fundamental agency obligations related to EEO, including:
  - Execution of barrier investigations
  - Completion of the annual Part G compliance assessment
  - Completion of approved prior-year Part H corrective plans

B.3.b

Agency Strategic Plan  
includes EEO  
Principles

B.4.a.2

Funding & Qualified  
Staffing to Conduct  
*Barrier Analysis*

B.4.a.1

Resources to Conduct  
Annual *Compliance*  
*Assessment*

<sup>27</sup> See MD-110 Chapter 1.III, EEO Director’s Independent Authority and Reporting Relationships.

- Development of complete and accurate workforce and applicant data necessary to generate mandatory MD-715 data tables
- Production of critical information from other sources (e.g., anti-harassment, reasonable accommodations) required by MD-715
- Ensuring that all managers and supervisors are compliant with mandatory training requirements (e.g., anti-harassment)

B.4.a.7

Resources to Maintain  
Accurate Employee &  
Applicant Data  
Systems

B.4.a.9

Funding & Qualified  
Staffing to Effectively  
Manage *AH Program*

B.4.a.10

Funding & Qualified  
Staffing to Effectively  
Manage *RA Program*

B.5.a.1 thru B.5.a.5

Managers/Supervisors  
Trained on Mandatory  
EEO-related Topics (5)

## E.4. Essential Element C: Management and Program Accountability

MD-715 explains that a model Title VII and Rehabilitation Act program will hold managers, supervisors, personnel officers, and EEO officials accountable for effective implementation and management of the agency's EEO-related obligations. Per MD-715, in ensuring such accountability, the agency must:

- Ensure collaboration between the EEO office and human resources (HR) office on (a) conducting barrier analyses, (b) preparing the Annual Agency EEO Program Status (MD-715) Report, (c) implementing the Affirmative Action Plan for Persons with Disabilities, (d) conducting outreach and recruiting, and (e) training managers and supervisors.
- Ensure that the HR office provides timely, accurate, and complete employee, applicant, and other data required to prepare the MD-715 data tables.
- Ensure that the HR office provides timely access to complete and accurate data and information from *other* sources (beyond employee and applicant data), including (a) exit survey/interview data, (b) climate assessment survey results, and data on (c) complaints of harassment, (d) requests for reasonable accommodations, and (e) grievances.
- Ensure effective coordination between the EEO program and relevant HR programs, including the Anti-Harassment Program, Federal Equal Opportunity Recruitment Program (FEORP), Disabled Veteran Affirmative Action Program (DVAAP), and Selective Placement Program (SPP) for persons with disabilities.
- Establish and implement procedures to prevent all forms of discrimination, specifically including harassment and failure to provide reasonable accommodations to qualified persons with disabilities. Ten percent of Part G compliance measures assess agency performance related to reasonable accommodations or anti-harassment obligations.
- Ensure that all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program.
- Ensure that rating officials evaluate the performance of managers and supervisors based on nine different EEO-related requirements: (1) resolving EEO disagreements, including participating in alternative dispute resolution; (2) ensuring cooperation of subordinates with EEO officials; (3) maintaining a workplace free from discrimination (including harassment and retaliation); (4) ensuring subordinate supervisors have effective managerial,

communication, and interpersonal skills; (5) providing reasonable religious and (6) disability-related accommodations; (7) supporting barrier analysis and (8) anti-harassment efforts, and (9) complying with settlement agreements and orders.

Strengths related to this element:

- One of GSA's greatest overall strengths in this element is the relevant data and related support provided by OHRM's Human Capital Analytics Branch, Office of HR Systems, and Talent Development Division. Collectively, those three entities annually provide more than 25,000 employee, applicant flow, and career development data elements critical to supporting MD-715 analyses and reporting obligations.
- GSA revised its reasonable accommodations procedures in FY21 to address deficiencies identified by the EEOC during their FY20 Technical Assistance Review. The updated procedures were reviewed by EEOC and found to be compliant on January 7, 2022.

Within this element there are numerous areas that require improvement:

- During FY21, collaboration between the EEO and HR programs was adversely impacted by HR workloads and shifting priorities relating to COVID-19 factors and development and implementation of DEIA initiatives, adversely affecting performance within several obligation areas. Specifically, the HR office was unable to collaborate adequately on (1) barrier analyses, (2) preparation of the MD-715 report, (3) implementation of GSA's Affirmative Action Plan for Persons with Disabilities, or (4) conducting outreach and recruiting (all reportable deficiencies). Additionally, OHRM was also unable to coordinate effectively with OCR on efforts of relevant HR programs, including the SPP, FEORP, DVAAP, and Anti-Harassment Program.
- The GSA Anti-Harassment Program was unable to provide data to support the assessment of timeliness of harassment inquiries (a reportable Part G deficiency), preventing completion of the annual assessment and report (independent deficiencies), as well as relevant analyses of triggers and barriers (separate additional deficiencies).

C.4.e.4  
HR/EEO Collaborate on Barrier Analysis and Elimination

C.4.e.5  
HR/EEO Collaborate on Preparing Annual MD-715 Report

C.4.e.1  
HR/EEO Collaborate to Implement Affirmative Action Plan for PWD

C.4.e.2  
HR/EEO Collaborate on PWD Outreach & Recruiting

C.2.a.5  
Timely Processing of Harassment Allegations



- The GSA Reasonable Accommodations Program was not able to provide timely, complete, and accurate data to support completion of the annual MD-715 compliance assessment (a reportable deficiency). The data was sufficient to confirm that accommodations were untimely processed in FY21; however, data was not sufficiently accurate to assess and report the extent of the untimeliness (a separate deficiency).

C.2.b.5

Timely Processing of Reasonable Accommodations

- Comprehensive MD-715 data requirements are provided in the EEOC Instructions.<sup>28</sup> While employee data, applicant data, and career development data are all predominantly accurate and complete, each of those three areas has key technical deficiencies that are reportable under Part G and/or Part J<sup>29</sup> of the MD-715 report. Collectively, those data-related issues prevent the development of accurate MD-715 data tables (a reportable deficiency) and negatively impact both trigger identification and barrier analysis (each an independently reportable deficiency in essential element D (proactive prevention of discrimination)). Additionally, those issues also directly impact GSA's ability to meet its participation goals for Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD) (both deficiencies in Part J).

C.4.c

HR Timely Provides Complete & Accurate Data for MD-715 Tables

C.4.d

HR Provides *Other Data* for MD-715 Analysis/Reporting

- Examples of issues with employee data:
  - GSA employee data has internal conflicts between critical data elements inside the system of record, such as employee appointment authority codes that take disability into account, veteran's preference codes denoting status as a disabled veteran, and disability status codes. That data also conflicts with external data associated with requests for disability-related reasonable accommodations.<sup>30</sup>
  - GSA is unable to differentiate between data that is self-identified by employees and data that is artificially generated by the agency (such as when an employee leaves a self-identification form blank). This adversely impacts the effectiveness of assessments and analyses related to race, ethnicity, sex, and disability status.

<sup>28</sup> See EEOC Instructions, Section IV – Interpretation and Completion of Workforce Data Tables.

<sup>29</sup> Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities.

<sup>30</sup> 29 C.F.R. § 1614.203(d)(6)(ii) permits agencies to classify an employee as a person with a disability based on (a) self-identification, (b) hiring authorities that take disability into account (such as Schedule A(u) and authorities for disabled veterans), and (c) requests for reasonable accommodations.

- The Schedule A(u) hiring authority for individuals with intellectual disabilities, severe physical disabilities, or psychiatric disabilities *requires* employees, once appointed under that authority, to (a) furnish an accurate disability code or, if they do not, (b) agencies should determine the appropriate code using the employee's records or medical documentation<sup>31</sup> (resulting in an accurate code, whether self-identified or designated by the agency). Many GSA employees appointed under Schedule A(u) have inaccurate disability status codes within the employee data system of record (including codes that indicate they have *no* disabilities).
- Agencies are required to annually report statistics related to the conversion of eligible Schedule A(u) hires to the competitive service (and must also identify any reasons for not converting eligible employees after the conclusion of their respective two-year probationary periods). That information was not available in FY20 or FY21 (a reportable Part J deficiency). Subsequent analysis identified 43 eligible-but-unconverted Schedule A(u) employees who remain in the excepted service an average of six years after their respective probationary periods ended.
- Issues with applicant flow data:
  - EEOC Instructions require applicant flow data to include accurate statistics on five independent milestones within the selection process, including data on: (1) *applications*, (2) *qualified* applicants, (3) *referred* applicants, (4) *interviewed* applicants, and (5) *selected* applicants. GSA does not consistently collect data on interviews. Interview data was available for fewer than 20% of FY21 announcements, preventing effective trigger identification and barrier investigations. The lack of interview statistics was also documented as a deficiency by the EEOC during their FY20 Technical Assistance Review.
  - A very significant challenge to barrier analysis of applicants is the exceptionally low rate of self-identification of disability status during the application process. During FY21, only 32% of new hire applicants and 14% of applicants for internal competitive promotions voluntarily disclosed disability status information.
  - Although not required to develop the MD-715 data tables, another challenge to the barrier analysis process is a lack of comprehensive applicant flow data for appointments made using direct hire authorities. Notably, the single most-used appointment source among all current GSA employees is a direct hire authority<sup>32</sup>.

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<sup>31</sup> See Privacy Act Statement, OPM Standard Form 256 (SF-256) Self-Identification of Disability.

<sup>32</sup> Appointment Authority Code AYM accounts for 13% of all current GSA employees.

- Issues with career development data:
  - Part J of the annual MD-715 report requires agencies to identify and report statistics on PWD and PWTD participation in career development opportunities that require competition and/or supervisory recommendations or approvals. Specifically, Part J requires agencies to identify participation statistics for PWD, PWTD, and overall agency participation in seven separate categories of career development programs<sup>33</sup>, including: (1) internship programs, (2) fellowship programs, (3) mentoring programs, (4) coaching programs, (5) detail programs, (6) training programs, and (7) other career development programs. While GSA manages and provides relevant data on a variety of “Competitive Development Programs” (CDPs), during FY21, it did not manage, compile, or provide agency-wide statistics on participation in details, internships, or mentoring opportunities. Subsequently, in FY22, data on FY21 internships was captured and compiled for this report. Additionally, mechanisms are currently under development to do the same with details, beginning in FY22, and separate plans are being executed to begin compiling mentoring statistics in FY23.
  - Variations from year to year in CDP data also complicate analyses. In FY20, data provided to support MD-715 reporting included independent data on nominations and selections for each of the separate CDPs; however, FY21 nomination data was not CDP-specific, preventing detailed trend analysis and benchmarking of individual selections against relevant CDP-specific nominee pools, which is a key step in barrier analysis.

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<sup>33</sup> See EEOC Instructions, Section III.II, Part J Section IV.B(2): Career Development Opportunities.

## E.5. Essential Element D: Proactive Prevention of Discrimination

According to MD-715:

“Agencies have an ongoing obligation to *prevent* discrimination on the bases of race, color, national origin, religion, sex, age, reprisal, and disability, and to eliminate barriers that impede free and open competition in the workplace. As part of this on-going obligation, agencies must conduct a self-assessment on at least an annual basis to monitor progress, identify areas where barriers may operate to exclude certain groups, and develop strategic plans to eliminate identified barriers.”<sup>34</sup>

In addition, MD-715 also states that:

“Each agency must develop and maintain an affirmative action program plan for the hiring, placement, and advancement of individuals with disabilities”<sup>35</sup> and that agencies have a “responsibility to provide employment opportunities for qualified applicants and employees with disabilities, especially those with targeted disabilities.”<sup>36</sup>

To those ends, this element requires that:

- Agencies must regularly (at least annually) identify potential signs of discrimination (triggers) using both (1) mandatory MD-715 data tables and (2) specific *other sources of information*, including, but not limited to: (a) data on reasonable accommodations; (b) data pertaining to the anti-harassment program; and (c) data from exit surveys (which must include questions on how the agency can improve recruitment, hiring, inclusion, advancement, and retention of PWD).
- Agencies must conduct systematic root cause analyses to identify potential barriers, specifically by using relevant other sources of information (beyond workforce/applicant data).
- When barriers are identified, agencies must develop and implement plans to remove them.
- Agencies must produce and implement an Affirmative Action Plan for PWD (Part J of the MD-715 report).

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<sup>34</sup> See MD-715, Section II.D.; see also EEOC Instructions, at Section I.IV (Element D).

<sup>35</sup> Ibid, Part B.I.

<sup>36</sup> Ibid, Part B.III.

GSA has one notable strength in this element:

- The process for using employee and applicant data *to identify triggers* is both highly refined and automated, making that process both very effective and efficient, speeding the initial step of the barrier investigation process and enabling consistent analyses from year to year.

In addition to that strength, GSA also has several deficiencies within this essential element:

- Aside from employee data, applicant data, and FEVS results, data from relevant *other sources of information* was not timely provided in FY21 and/or the data that was provided was not accurate and complete, preventing both mandatory trigger identification and barrier analysis efforts (separate reportable deficiencies). Shortfalls with exit survey data, anti-harassment program data, and reasonable accommodations data are all independently reportable deficiencies addressed by compliance measures under other essential elements.
  - D.1.b  
Trigger Identification Regularly includes Other Data Sources
  - D.2.d  
Barrier Investigations Regularly include Other Data
- GSA's exit survey language lacks questions required by MD-715<sup>37</sup> on "how the agency can improve the recruitment, hiring, inclusion, and advancement of individuals with disabilities." That deficiency was previously identified in FY18 and FY20 and remains unresolved.
  - D.1.c  
Exit Surveys are Conducted & Include Questions on PWD
- One of the most significant deficiencies relates to implementation of the Affirmative Action Plan (AAP) for PWD. Major improvements are required in each of the four critical aspects of the AAP, including (1) recruitment, (2) hiring, (3) advancement, and (4) retention of PWD and PWTD<sup>38</sup>. Shortfalls in the AAP account for only two deficiencies within this element; however, they are associated with deficiencies in other elements and in Part J, as well as to shortcomings in several related HR programs and activities that affect PWD, including:
  - Reasonable Accommodations Program
  - Disabled Veterans Affirmative Action Program (DVAAP)
  - Selective Placement Program (SPP)

<sup>37</sup> See EEOC Instructions on MD-715, Section I.IV.A(3) and 29 C.F.R. § 1614.203(d)(1)(iii)(C)

<sup>38</sup> 29 C.F.R. § 1614.203(d)(7)(ii) and MD-715 Part G require agencies "to take specific steps reasonably designed to gradually increase the number of persons with disabilities or targeted disabilities employed at the agency."

- Utilization of the Schedule A(u) hiring authority
  - Management and conversion of employees appointed under Schedule A(u)
  - Management of disability status codes for individuals hired under Schedule A(u)
  - Management of disability status codes for disabled veterans hired under the Veteran’s Recruitment Act (VRA), Veteran’s Employment Opportunity Act (VEOA), and 30% or More Disabled Veteran hiring authorities
  - Management of disability status codes for disabled veterans with Office of Personnel Management (OPM) veterans’ preference codes associated with a service-connected disabilities<sup>39</sup>
- Because of the shortfalls in implementation of the AAP (as well as with the other programs and issues identified above), GSA demonstrates deficiencies in its obligations to:
- Take *specific steps* to ensure that qualified PWD are aware of and encouraged to apply to job vacancies.<sup>40</sup>
  - Take *specific steps* that are reasonably designed to increase the number of PWD and/or PWTD employed at the agency until it meets its established participation goals.<sup>41</sup>

D.4.b

Agency takes *Specific Steps* to Recruit Qualified PWD

D.4.d

Agency takes *Specific Steps* to Meet % Goals for PWD & PWTD

<sup>39</sup> See <https://www.opm.gov/policy-data-oversight/veterans-services/vet-guide-for-hr-professionals/> and <https://dw.opm.gov/datastandards/referenceData/1587/current?index=V>. Veterans’ preference codes 4 and 6 *always* indicate status as a disabled veteran. Veterans’ preference code 3 *may* indicate status as a disabled veteran.

<sup>40</sup> See 29 C.F.R. § 1614.203(d)(1).

<sup>41</sup> 29 C.F.R. § 1614.203(d)(7) requires agencies to commit to ensuring PWD and PWTD participation (at both the GS-10 level and below and at the GS-11 level and above) is no less than 12% for PWD and no less than 2% for PWTD.

## E.6. Essential Element E: Efficiency

MD-715 “requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency’s EEO programs and an efficient and fair dispute resolution process.”<sup>42</sup> To that end, this element requires that agencies:

- Have an efficient, fair, and impartial complaint resolution process.
- Have a neutral EEO process, separate from the agency’s defensive function and other agency functions with conflicting or competing interests.
- Establish and encourage widespread use of alternative dispute resolution (ADR) to facilitate early, effective, and efficient informal resolution of disputes.
- Maintain systems to accurately collect, monitor, and analyze all the following types of data:
  - Employee race, national origin, sex, and disability status demographics
  - Applicant flow data concerning race, national origin, sex, and disability status
  - Processing of requests for disability-related reasonable accommodations
  - Processing of allegations of harassment
  - Recruitment activities
  - EEO complaint activity

In FY21, GSA showed a 26% decrease in complaint activity compared to FY20, with widespread telework opportunities believed to be a major contributing factor. In FY21, GSA was timely in all complaints processing, including all counseling, investigations, and final agency decisions.

Two strengths in this element relate to ADR: The FY21 acceptance rate for ADR improved 17% over FY20, and the percentage of cases that were settled (in lieu of using the formal complaint process) increased by 41%. Another strength is the presence of a dedicated Attorney Advisor within OCR’s Adjudication and Compliance Team to help ensure neutrality of the EEO process.

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<sup>42</sup> See MD-715, Model Agency Title VII and Rehabilitation Act Programs, at Section II.E and EEOC Instructions, at Section I.V.

All deficiencies in this element relate to agency obligations to maintain effective data collection and management systems required to accurately evaluate EEO-related programs. Specifically, there are deficiencies in GSA’s systems of (1) employee data, (2) applicant flow data, (3) anti-harassment data, (4) reasonable accommodations data, and (5) recruitment data.

Note: The Part G checklist comprehensively assesses compliance by evaluating separate aspects of key requirements using different measures within different essential elements, each focused on a particular EEO obligation. With respect to data, element C assesses *required outcomes* (i.e., timely, accurate, and complete data), while essential element B assesses the *adequacy of funding and qualified staffing resources* to achieve those outcomes and element E measures the *adequacy of systems to accurately collect, monitor, and analyze data* (in this context, “systems” include hardware, software, and associated data management procedures). Deficient outcomes associated with each of the five data areas identified above may be a result of a combination of shortfalls in (a) staffing resources, (b) training, (c) systems/software, and/or (d) data management. As a result, essential elements B, C, and E each include unique but interrelated deficiencies relating to data. Figure 5 (at the end of this section) consolidates and depicts all thirty Part G deficiencies identified during FY21, as well as key interrelationships.

Within this essential element, examples of FY21 deficiencies include:

- GSA’s employee data system does not effectively integrate disability status information from applicable sources, nor can the system of record identify the source of each element of demographic data (i.e., whether an employee’s race/ethnicity or disability status was self-identified or designated by the agency).<sup>43</sup>
- During FY21, 93 PWTB employees were found to have former disability status codes that had been eliminated by OPM in 2017, resulting in those employees not being accounted for as either PWD or PWTB in any analyses or reports during FY18, FY19, or FY20.
- In cases when employees do not self-identify race or ethnicity (or are believed to have self-identified inaccurate information), the agency does not consistently follow regulations.<sup>44</sup>

E.4.a.2

System to Accurately  
Collect, Monitor, &  
Analyze *Employee*  
Data

<sup>43</sup> See EEOC Instructions, Section IV.I.E and 29 C.F.R. § 1614.203(d)(6)(ii).

<sup>44</sup> In cases when race or ethnicity is not self-identified, 29 C.F.R. § 1614.601(b) states that “the agency must make visual identification and inform the employee of the data it will be reporting.” In the case of information believed to be incorrect, the agency must advise the employee on the need for accuracy data, to encourage correct reporting.



For example, HR does not engage with employees who self-identify as every race and ethnicity category (an exceptionally unlikely combination that is often more indicative of inaccurate self-identification (and one that ultimately results in the employee being classified within the employee data system of record as only Hispanic<sup>45</sup>)).

- Schedule A(u) hires do not all have accurate disability status information within the employee data system of record, in accordance with OPM requirements.
- GSA’s applicant flow data procedures do not ensure the capture of mandatory data (specifically, accurate and complete statistics on which referred applicants were subsequently interviewed).
- Data on recruitment activities is not managed within a system that permits accurate collection, monitoring, or analysis.
- Although complete and accurate EEO complaints data is collected, monitored, and analyzed annually, data on allegations of harassment is not similarly available to support trigger identification, barrier analysis, or annual Part G assessment requirements (all independent deficiencies).
- Reasonable accommodations data is both inaccurate and incomplete, preventing effective analysis, accurate Part G assessment and reporting, as well as tracking of Part H corrective plans to address untimely processing of reasonable accommodations requests (a FY20 and FY21 deficiency).

E.4.a.4

System to Accurately  
Collect, Monitor, &  
Analyze *Applicant Data*

E.4.a.3

System to Accurately  
Collect, Monitor, &  
Analyze *Recruiting*

E.4.a.6

Systems to Accurately  
Collect, Monitor, &  
Analyze *AH Data*

E.4.a.5

Systems to Accurately  
Collect, Monitor, &  
Analyze *RA Data*

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<sup>45</sup> Per OPM business rules, identification of an employee as Hispanic or Latino disregards any race selections made by the employee or agency, resulting in the employee EEO-related data displaying as Hispanic only.

## E.7 Essential Element F: Responsiveness and Legal Compliance

According to EEOC Instructions, agencies must:

- Have processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.
- Comply with the law, including EEOC regulations, management directives, orders, and other written instructions.
- Report program efforts and accomplishments to EEOC.

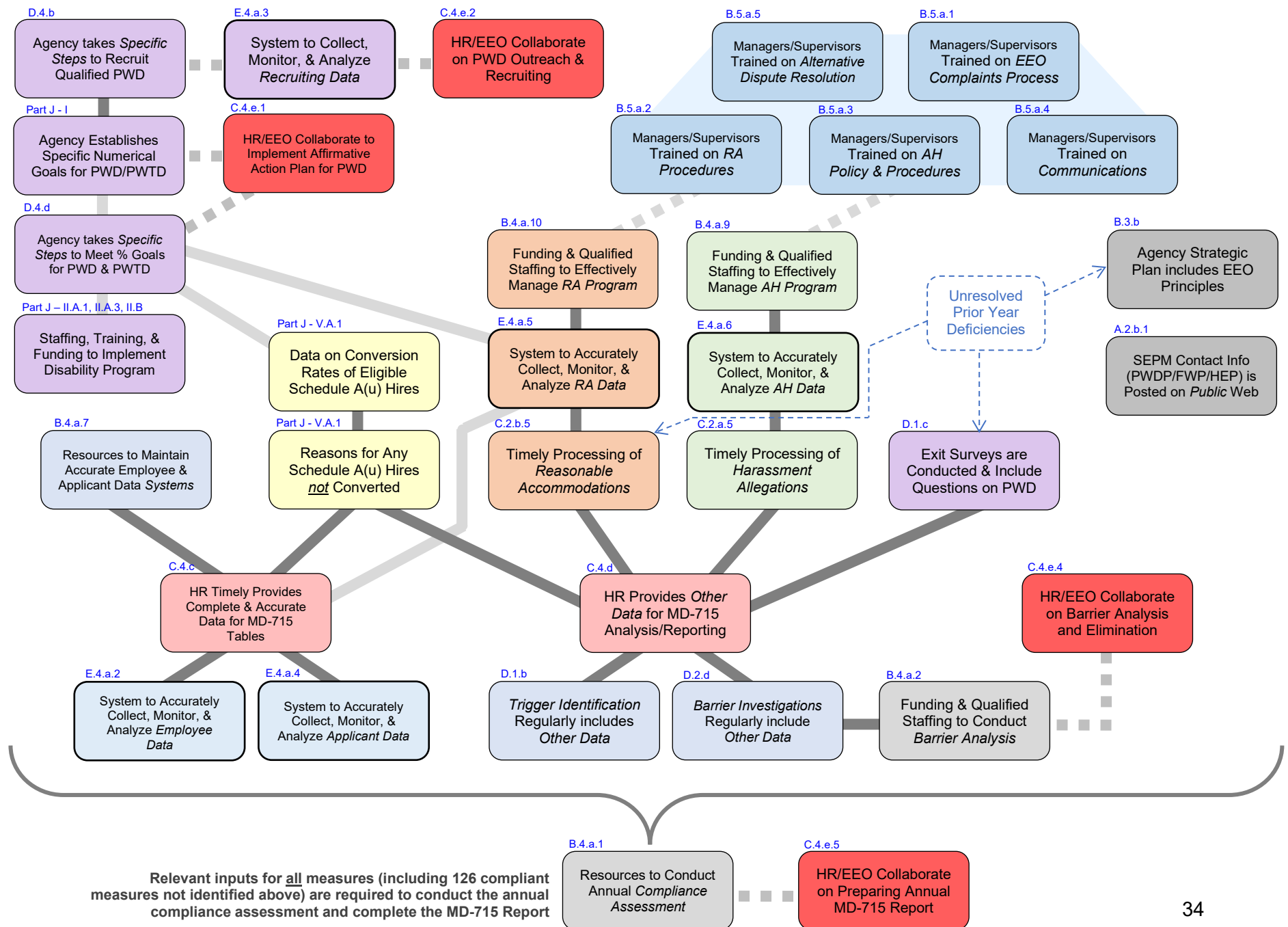
GSA is fully compliant with all measures within this essential element.

Table 3 (on the next page) consolidates and summarizes the thirty identified FY21 Part G deficiencies, within each of their respective Essential Elements of Model EEO Programs. Figure 5 (on the page following Table 3) shows major interrelationships between the identified deficiencies, as well as four relevant shortfalls identified within Part J of the report (the Special Program Plan for Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities). The complete Part G Self-Assessment Checklist begins on page 63.

**TABLE 3: Part G Self-Assessment Measures Identified in FY21 as Deficient**

Measure					Questions
1	A	2	b	1	Does the agency prominently post the business contact information for its Special Emphasis Program Managers throughout the workplace and on its public website?
2	B	3	b		Does the agency's current strategic plan reference EEO principles? If "yes", identify the EEO principles in the strategic plan.
Has the agency allocated sufficient funding and qualified staffing to:					
3	B	4	a	1	Conduct a self-assessment of the agency for possible program deficiencies?
4	B	4	a	2	Conduct a thorough barrier analysis of its workforce?
5	B	4	a	7	Maintain accurate data collection and tracking systems for workforce demographics, and applicant flow data?
6	B	4	a	9	Effectively manage its anti-harassment program?
7	B	4	a	10	Effectively manage its reasonable accommodation program?
Have all managers and supervisors received training on their responsibilities regarding:					
8	B	5	a	1	The EEO Complaint Process?
9	B	5	a	2	Reasonable Accommodation Procedures?
10	B	5	a	3	Anti-Harassment Policy?
11	B	5	a	4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?
12	B	5	a	5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?
13	C	2	a	5	Does the agency begin an inquiry of all harassment allegations within 10 days of notification, including those initially raised in the EEO complaint process? What is the percentage of timely-processed inquiries?
14	C	2	b	5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? What is the percentage of timely-processed requests?
15	C	4	c		Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables?
16	C	4	d		Does the HR office timely provide the EEO office access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request?
Does the EEO office collaborate with the HR office to:					
17	C	4	e	1	Implement the Affirmative Action Plan for PWD?
18	C	4	e	2	Develop and/or conduct outreach and recruiting initiatives?
19	C	4	e	4	Identify and remove barriers to EEO in the workplace?
20	C	4	e	5	Assist in preparing the MD-715 report?
21	D	1	b		Does the agency regularly use the following sources of information <u>for trigger identification</u> : Workforce data, complaint/grievance data, exit surveys, focus groups, affinity groups, program evaluations, Special Emphasis Programs, reasonable accommodation program, anti-harassment program, and external special interest groups?
22	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?
23	D	2	d		Does the agency regularly review the following sources of information <u>to find barriers</u> : Complaint/grievance data, exit surveys, focus groups, affinity groups, program evaluations, anti-harassment program, Special Emphasis Programs, reasonable accommodation program, and external special interest groups?
24	D	4	b		Does the agency take specific steps to ensure qualified Persons with Disabilities are aware of and encouraged to apply for job vacancies?
25	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?
Does the agency have systems in place to accurately collect, monitor, and analyze:					
26	E	4	a	2	The race, national origin, sex, and disability status of agency employees?
27	E	4	a	3	Recruiting activities?
28	E	4	a	4	External & internal applicant flow data concerning applicants' race, national origin, sex, and disability status?
29	E	4	a	5	The processing of requests for reasonable accommodation?
30	E	4	a	6	The processing of complaints for the anti-harassment program?

**FIGURE 5: FY21 Deficient Measures & Interrelationships** **FY21 Part G Deficiencies & Part J Compliance Measures** and key interrelationships



## E.8 Workforce Analyses

The GSA workforce is comprised primarily of permanent employees (97%) and General Schedule (i.e., GS, GL, and GM) employees (98.6%), the majority of which (77%) fall between grade levels GS-12 to GS-14. Fewer than 6% of employees are in grade levels GS-10 and below. A total of 126 employees (1.1%) are in senior pay plans (i.e., ES, EX, SL, and CA) and 41 employees (0.3%) are in Federal Wage System positions (i.e., WG, WL, and WS).

Preliminary workforce analyses (trigger identification) utilized employee and applicant data from the mandatory MD-715 tables to assess opportunity throughout the employment lifecycle by comparing the participation rates of specified demographic groups against relevant EEOC benchmarks. Differences between participation rates and relevant benchmarks were used to identify “triggers” (indicators of potential discriminatory barriers affecting a particular group). FY21 benchmarking used both external and internal baselines, as specified by the EEOC. External benchmarks included Census data (e.g., National Civilian Labor Force (NCLF), occupation-specific CLFs (OCLFs), and/or regional CLFs), as well as specified federal goals for PWD and PWTD. Internal benchmarks included demographics from relevant workforce feeder pools associated with key employment lifecycle events (e.g., promotions, awards, separations).

To simplify analyses, the GSA depicts all comparative results as percentages, *relative to their respective relevant benchmarks*, so that a value of 100% is “expected” (i.e., actual demographic rates equal their respective benchmarks). Using this methodology, trigger percentages below 100% signify that actual participation rates were lower than expected, while trigger percentages above 100% indicate that actual participation rates were higher than expected. In almost all cases, the analyses assess participation of groups in *desirable* employment opportunities (such as referrals, selections, promotions, hires, awards, etc.). Therefore, in most cases, lower than expected participation rates (i.e., trigger rates below 100%) are unfavorable (and therefore, triggers). When analyzing adverse employment events (such as involuntary separations), the opposite is true, and higher than expected rates (i.e., trigger rates over 100%) are unfavorable.

Except for the federal goals for PWD and PWTD participation, EEOC benchmarks are *not* goals. There are no demographic or “diversity” targets related to race, ethnicity, or sex. Demographic benchmarks are only used to identify areas where triggers exist, so that more comprehensive investigations can then be conducted to identify their root causes (which may or may not be discriminatory barriers). A fundamental goal is therefore to determine *why* such demographic disparities exist. Achieving parity with race, ethnicity, or other benchmarks is not an intended outcome.

Demographic Groups:

The demographic groups assessed under EEOC MD-715 are derived from Office of Management and Budget (OMB) Standards for the Classification of Federal Data on Race and Ethnicity<sup>46</sup> and associated OPM Data Standards. In combination, the OMB and OPM data standards include (and permit) only five selectable race categories<sup>47</sup> and one ethnicity category, and limit sex to either Male or Female. Under MD-715, statistics are presented in combinations of race or ethnicity, plus Male or Female, using the groups shown in the Table 4, below. Two-character abbreviations are used in charts and other figures, in lieu of lengthy plain-language group names, to save space. In the order presented in the MD-715 tables, the groups include:

**TABLE 4:** Race/Ethnicity/Sex Groups and Respective Abbreviations

Full Demographic Group Title	Abbrev.
Males	M
Females	F
Hispanic Males	HM
Hispanic Females	HF
White Males	WM
White Females	WF
Black or African American (Black) Males	BM
Black or African American (Black) Females	BF
Asian Males	AM
Asian Females	AF
American Indian or Alaska Native (AIAN) Males	IM
American Indian or Alaska Native (AIAN) Females	IF
Native Hawaiian or Other Pacific Islander (NHOPI) Males	NM
Native Hawaiian or Other Pacific Islander (NHOPI) Females	NF
Two or More Races Males	2M
Two or More Races Females	2F

In addition to the race/ethnicity/sex categories, MD-715 also requires assessment of 16 different disability groups (also derived from the OPM Data Standards), including employee/applicant classifications relating to (a) twelve individual targeted disabilities or serious health conditions<sup>48</sup> (i.e., PWTD), (b) all disabilities or serious health conditions (including targeted disabilities) (i.e., PWD), as well as cases where individuals (c) did not wish to identify their disability or serious health condition, or (d) do not have a disability or serious health condition.

<sup>46</sup> [https://obamawhitehouse.archives.gov/omb/fedreg\\_1997standards](https://obamawhitehouse.archives.gov/omb/fedreg_1997standards)

<sup>47</sup> The Two or More Races category is not selectable, but is based on OMB/OPM business rules, which depend on which of the selectable race categories have been self-identified by employees or applicants.

<sup>48</sup> See [https://www.opm.gov/forms/pdf\\_fill/sf256.pdf](https://www.opm.gov/forms/pdf_fill/sf256.pdf) for the complete list of twelve targeted disabilities.

Externally Benchmarked Employee Demographics:

Prior to FY21, participation rates were benchmarked using 2010 (decennial) Census data. For FY21, the EEOC directed agencies to re-baseline their comparisons using data from the 2014-2018 Census. Below are the old and new NCLF benchmarks for each demographic group.

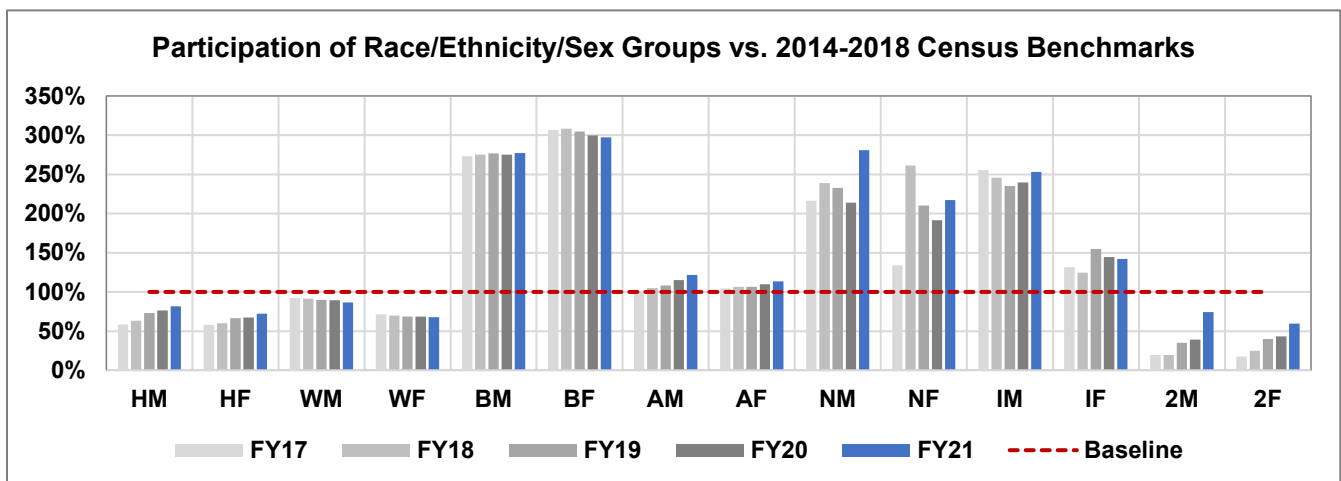
**TABLE 5:** National Civilian Labor Force (NCLF) Benchmarks from 2010 and 2014-2018 Census Data

NCLF	HM	HF	WM	WF	BM	BF	AM	AF	NM	NF	IM	IF	2M	2F
2014-2018	6.82%	6.16%	35.65%	31.82%	5.70%	6.61%	2.19%	2.18%	0.08%	0.08%	0.31%	0.31%	1.05%	1.05%
2010	5.17%	4.79%	38.33%	34.03%	5.49%	6.53%	1.97%	1.93%	0.07%	0.07%	0.55%	0.53%	0.26%	0.28%
Change	32%	29%	-7%	-6%	4%	1%	11%	13%	9%	9%	-45%	-43%	297%	281%

To avoid a subsequent “spike” in chart data (between FY20 and FY21, reflective of the changes to the Census benchmarks, rather than within the GSA workforce), all data presented in the figures (including prior-year data) is shown relative to the 2014-2018 Census benchmarks.

Prior to the FY21 re-baselining, only four demographic groups did *not* exceed their respective expected overall participation rates (Hispanic Females, White Males, White Females, and American Indian or Alaska Native Females). Following the re-baselining, Hispanic Males, Two or More Races Males, and Two or More Races Females now also fall below their respective Census comparators. Based on population sizes, trends, actual and other factors, the most significant “overall participation rate” triggers are for White Females (68% of their expected rate), Hispanic Females (72%), Hispanic Males (82%), and White Males (87%).

**FIGURE 6:** Overall Participation of GSA Demographic Groups vs. Relevant Benchmarks



With regard to agency-level five-year overall demographic *trends*, the most significant triggers are for White Females and White Males. Those are the only groups to have both (1) lower than expected participation rates (compared to relevant Census benchmarks) and (2) decreasing trends over the past five years (White Females down 5% and White Males down 6%).

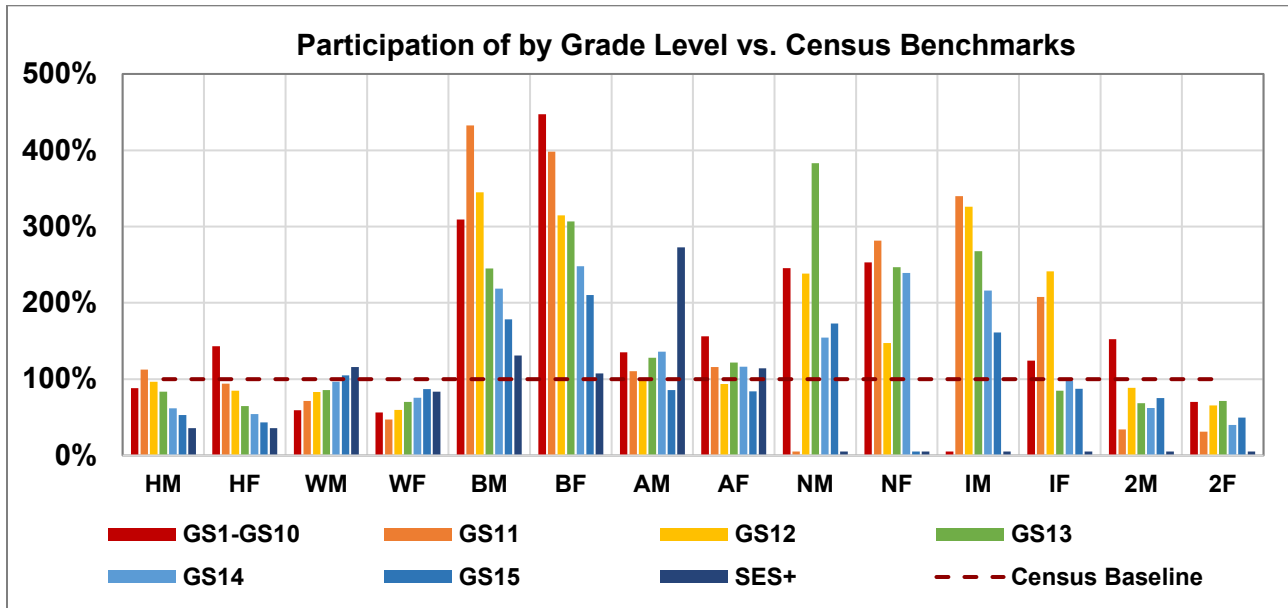
The triggers for White Females and White Males relate directly to the GSA's most notable overall race/ethnicity/sex trend: GSA is steadily becoming more "diverse." In contrast to the negative trends for White Females and White Males, almost all other demographic groups have experienced increases in their participation since FY17 (an average 59% increase for all non-White groups), and many of those groups already have higher than expected participation rates. The most notable increases over the past five years are Hispanic Males (up 40%), Hispanic Females (up 23%), and Asian Males (up 22%). Other demographic groups had even larger numerical increases in their respective participation rates; however, those changes are less noteworthy, due primarily to their much smaller population sizes (i.e., minor changes in population affect the participation rates of those smaller groups much more significantly). The increases in Two or More Races (relative to the Census benchmarks) are due to known anomalies in the 2014-2018 Census data, rather than to actual changes to the GSA population.

As with the re-baselining from 2010 Census data to 2014-2018 Census data, a similar shift will occur when data from the 2020 decennial Census becomes available and civilian labor force benchmarks are again updated. In general, that Census update is anticipated to further lower the expected participation rates of White Males and White Females and to raise the expected participation rates of other demographic groups. Historically, decennial data becomes available roughly three years after the Census concludes, so 2020 data will likely be available by 2023.

Compared to overall participation rates, grade-level participation rates are far more informative. As shown in Figure 7 on the next page, Hispanic males and Hispanic Females only exceed their expected participation rates within the very lowest grade levels and participate in all higher grades at much lower-than-expected levels. White Male participation remains below expected levels until GS-15. White Females are the only demographic group that falls below expected participation rates in *all* grade levels. Asian Male and Asian Female participation are predominantly just above expected levels in most grades, except for GS-15 (which falls slightly below expectations) and among SES, where Asian Male participation is well above the expected level. In contrast, Black Males and Black Females have higher than expected participation in *all* grade levels (up to and including SES), when compared to the most relevant 2014-2018 Census benchmarks; however, with considerably higher than expected participation in the lower grades.



**FIGURE 7:** Participation of GSA Race/Ethnicity/Sex Demographic Groups, by Grade Level vs. Census Benchmarks



Because the Census does not include data on disability status, external PWD and PWTD benchmarks instead come from federal percentage goals. Federal goals were established in 2007 for PWTD and were expanded by regulation<sup>49</sup> in 2017 to include numerical goals for both PWD and PWTD participation (12% and 2%, respectively), in both the GS-1 to GS-10 grade level “cluster” and the GS-11 to SES grade level cluster. For the first time ever, the GSA exceeds the federal goals in all four areas (i.e., both PWD and PWTD rates in both the low and high grade level clusters).

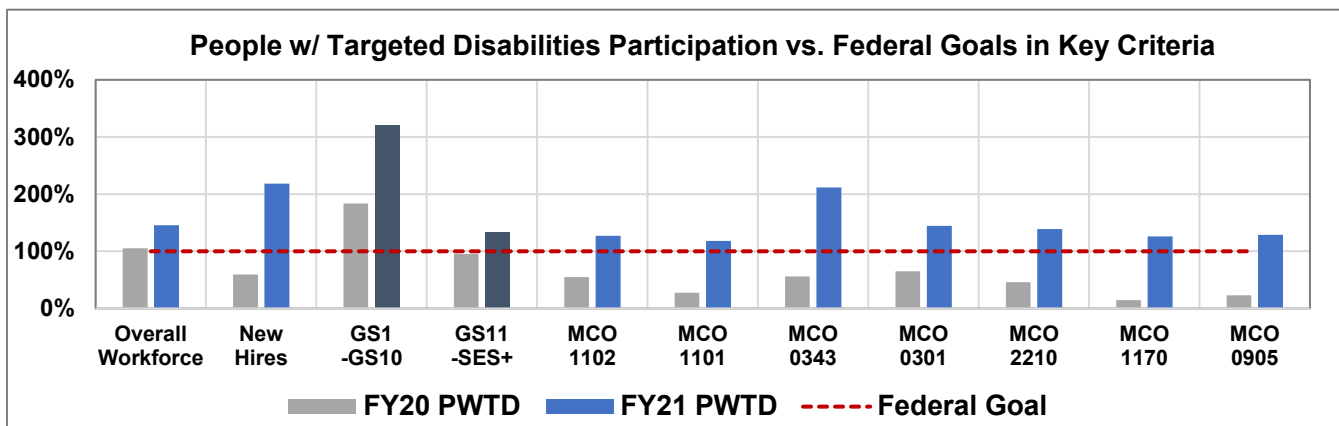
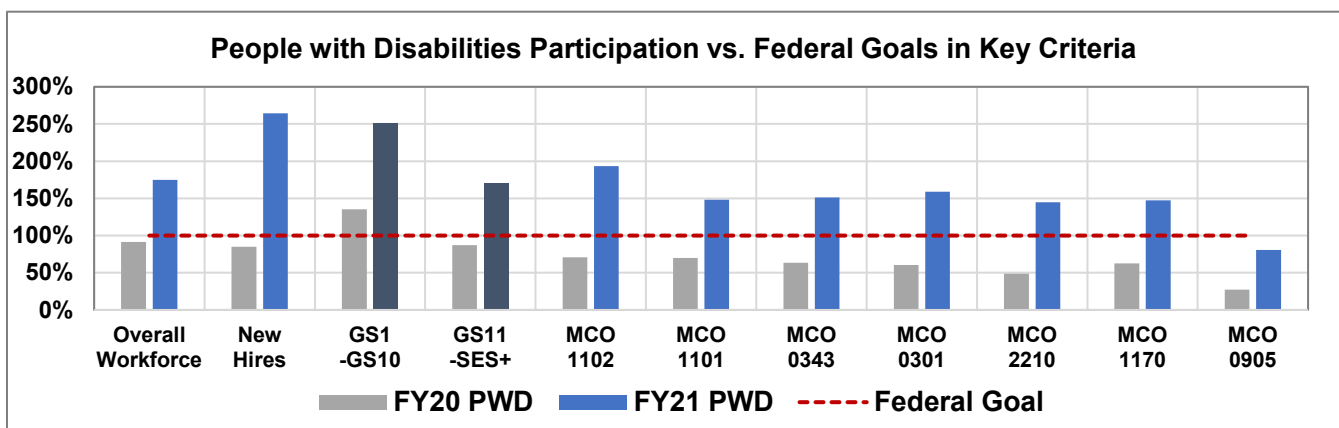
In addition to mandating PWD and PWTD participation goals for the two grade level clusters, the EEOC also directs agencies to use the same 12% and 2% federal goals as benchmarks for identifying and investigating potential barriers affecting PWD and PWTD participation among (a) the total workforce, (b) new hires, (c) separations, (d) subcomponents, (e) grade levels, (f) salary levels, (g) mission critical occupations, and (h) management positions.

GSA PWD and PWTD rates in FY21 improved significantly over FY20; however, they did not increase as a result of increased recruitment or hiring of PWD but were instead an outcome of independent efforts by the Affirmative Employment Program to more accurately identify PWD within the *existing* workforce. Associated corrections of outdated disability codes of 93 GSA

<sup>49</sup> See 29 C.F.R. § 1614.203(d)(7)

employees increased the number of overall PWTDD by 40% and PWD by 8%. Separately, PWD participation was increased by over 80% by manually reclassifying relevant employees as PWD using criteria associated with “hiring authorities that take disability into account.”<sup>50</sup> Additional PWD could not be classified in FY21 using data from requests for reasonable accommodations, because that data was not made available; however, the other FY21 efforts undertaken to classify PWD and improve PWTDD data effectively reversed GSA’s overall highest-priority FY20 MD-715 data trigger (low participation of PWD and PWTDD in mission critical occupations). The figures below show the improvements achieved between FY20 and FY21.

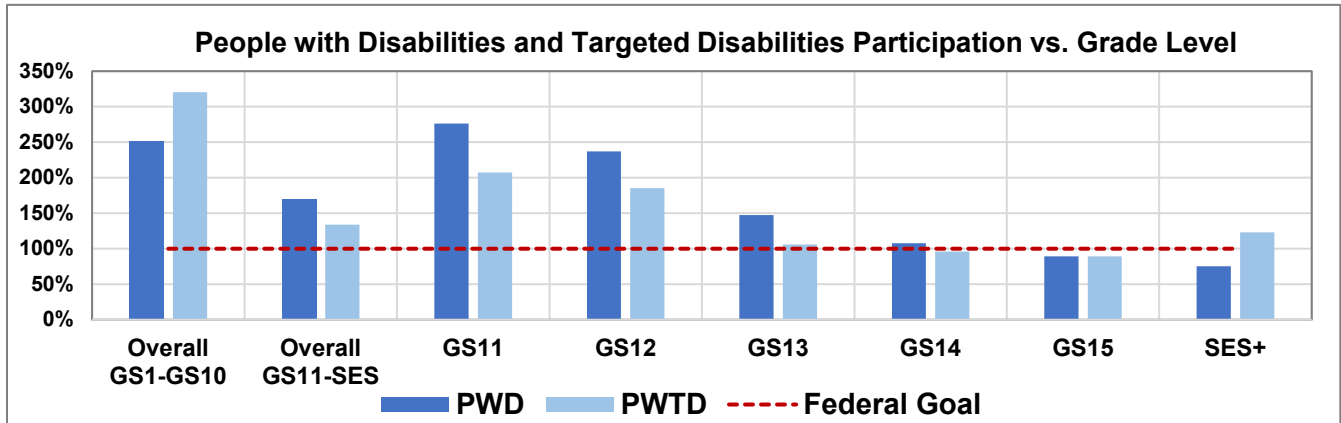
**FIGURES 8 and 9:** Participation of PWD and PWTDD vs. Federal Goals in Key Criteria



Although the GSA now meets the federal goals for the GS-11 to SES cluster, participation of PWD and PWTDD still show significant decreases as grade levels increase, and in grade levels GS-14 and higher, some participation rates fall below the federal goal benchmarks. Figure 10 depicts participation of PWD and PWTDD, both overall and within key grade levels.

<sup>50</sup> See 29 C.F.R. § 1614.203(d)(6)(ii)

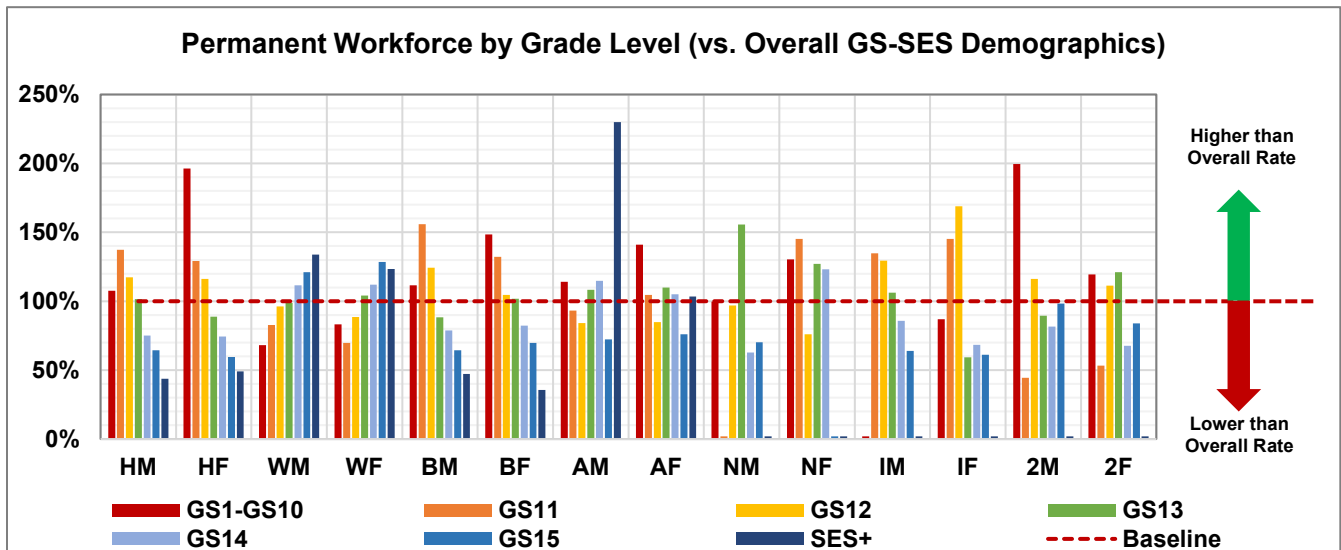
**FIGURE 10:** Participation of PWD and PWTDD in Grade Levels vs. Federal Goals



Internally Benchmarked Employee Demographics:

Similar to the grade level distribution of PWD and PWTDD shown in Figure 10, the distribution of race/ethnicity/sex demographics across all grade levels is particularly informative. Figure 11 benchmarks race/ethnicity/sex groups against their overall participation rates within GSA.

**FIGURE 11:** Grade Level Participation of Race/Ethnicity/Sex Demographic Groups vs. Overall Participation Rates



Most notably, Hispanic Males, Hispanic Females, Black Males, and Black Females all have relatively high participation rates within the lowest grade levels, but significantly lower rates within the upper grade levels. Their decreasing participation in high grades was identified in FY20 as the GSA’s highest priority triggers that were not related to disability status.

That situation is even more notable, considering the different *overall* rates of participation of those groups. Specifically, although overall workforce participation of Hispanic Males and Hispanic Females is lower than expected, and overall participation of Black Males and Black Females is much higher than expected (see Figure 6), all four groups share virtually identical grade level distributions (i.e., being disproportionately represented in low grades). Notably, White Male and White Female participation rates do the opposite. For purposes of trigger identification, Figure 7 is more relevant than Figure 11, as it uses Census data benchmarks.

Population Considerations:

In general, population data is less relevant to analyses than participation rates; however, it is important to understand how the population size of each demographic group may affect certain outcomes, and how that might, in turn, affect interpretation of associated results. For example, trends for very small groups often show more variability than large groups, because changes in population will tend to affect those smaller groups more significantly. Additionally, “expected” participation rates (which are generated mathematically) may not be applicable to small groups, because relevant benchmarks may yield “expected” rates equivalent to less than one employee.

**TABLE 6:** FY21 Race/Ethnicity/Sex Demographic Group Statistics

FY21	HM	HF	WM	WF	BM	BF	AM	AF	NM	NF	IM	IF	2M	2F
Population	438	388	4028	2656	1223	1859	472	382	20	15	58	40	85	74
Percentage	3.7%	3.3%	34.3%	22.6%	10.4%	15.8%	4.0%	3.3%	0.2%	0.1%	0.5%	0.3%	0.7%	0.6%

Within GSA, Hispanic, White, Black, and Asian employees account for 97.5% of the overall workforce. The White and Black groups are the largest (57% and 26% of the workforce, respectively), the Hispanic and Asian groups are next in size (7% each), and all other groups are comparatively much smaller (collectively, representing only 2.5% of the overall workforce). As such, analyses of the Native Hawaiian or Other Pacific Islander, American Indian or Alaska Native, and Two or More Races groups sometimes yield results that are atypical of those of the larger demographic groups (for example, note the relative variability of the data for those groups within Figure 11).

Applicant Demographics:

Analysis of applicant flow data (AFD) included data captured for announcements of (a) internal competitive promotions (6,500 applications) and (b) external new hires (265,000 applications). The most notable triggers related to AFD were (1) very consistent high rates of White Females

among selections for new hires (i.e., higher rates than expected in nine out of ten of mission critical occupations, averaging 227% of expected rates) and (2) high rates of White Male and Asian Male selections among internal competitive promotions. While favorable for those three groups, those results can also be considered triggers, because high rates for any one group must be associated with correspondingly lower than expected rates for one or more other groups.

One additional important overarching finding was very low rates of voluntary self-identification during the application process, particularly disability status identification by existing employees applying for internal competitive promotions (see Table 7, below).

**TABLE 7:** Grade Level Participation of Race/Ethnicity/Sex Demographic Groups vs. Overall Participation Rates

Overall, in both new hires and internal competitive promotions, an average of 70% of applicants self-identified their race, ethnicity, and sex; however, information on disability status was self-identified by only 32% of new hire applicants and only 14% of applicants for internal competitive promotions. Among applications to mission critical occupations, those figures were even lower (26% for new hires and 13% for internal competitive promotions). The root causes for these outcomes were not identified in FY21; however, one concern is that applicants (particularly current GSA employees) may believe that self-identification of a disability will have a negative impact on their applications. Alternatively, as current employees, they may have believed that their data was already on file and left it blank believing it was not needed.

Group	New Hires		Internal Competitive Promotions	
	Race, Ethnicity, & Sex	Disability Status	Race, Ethnicity, & Sex	Disability Status
MCO 0201	74%	24%	69%	13%
MCO 0301	74%	24%	72%	13%
MCO 0343	71%	26%	73%	15%
MCO 0501	75%	30%	80%	15%
MCO 0560	79%	21%	79%	15%
MCO 0905	21%	9%	No Internal Comp Data	
MCO 1101	73%	32%	73%	12%
MCO 1102	75%	33%	70%	16%
MCO 1170	73%	33%	60%	6%
MCO 2210	74%	30%	69%	15%
GS13	73%	31%	71%	16%
GS14	73%	28%	72%	13%
GS15	73%	31%	71%	9%
SES	63%	37%	No Internal Comp Data	

One additional challenge related to applicant flow data is the use of direct hire authorities. Specifically, because employees hired under direct hire authorities do not go through the

traditional application process, there is subsequently limited applicant flow data available for analysis (e.g., data documenting statistics on their rates of qualification, referral, interview, and selection). Because the most widely used appointment authority for current GSA employees is a direct hire authority (Appointment Authority Code AYM), the lack of AFD creates an analysis challenge. Similarly, appointments of both (a) occupational series 0905 (a mission critical occupation) and (b) SES also typically lack relevant comprehensive applicant flow data. In each of those three areas, demographic outcomes involve triggers that warrant deeper root cause analysis. For example:

- PWD and PWTD participation rates among AYM hires are roughly only 50% of their respective federal goals (and much lower than the next most widely used authorities).
- Series 0905 is the only mission critical occupation that falls below the federal goals for PWD participation.
- Race/ethnicity and PWD/PWTD participation triggers were also present among SES in FY20 (and were among the top five priorities for FY21 barrier analysis). Additionally, FY21 participation of PWD among SES also falls below the federal goal benchmark.

Analysis of those three issues will be difficult without more comprehensive applicant flow data.

Preliminary analysis was also conducted to explore potential correlations between rates of self-identification of disability status and other factors (such as race, ethnicity, sex, and grade level). Data from the employee data system of record could not be used effectively, because it cannot currently distinguish between (a) demographic data that was self-identified and (b) demographic data that was artificially designated by the agency (e.g., such as when employees leave their self-identification forms blank). The applicant flow data system (Monster Analytics) is capable of making that distinction; however, that data is also inherently limited by the very low rates of self-identification of disability status among applicants. Results were ultimately inconclusive.

#### Barrier Investigations:

Part I of the MD-715 report focuses on plans to eliminate barriers (i.e., resolving barriers identified during the previous fiscal year(s)). The Workforce Analyses section of Part E instead focuses on barrier *identification*, specifically (1) efforts to recognize triggers and (2) subsequent analyses undertaken determine the root causes of triggers and to identify barriers (conditions that tend to limit employment opportunities for members of a particular demographic group).

During FY20, twelve significant triggers were identified. Trigger prioritization aligned with the EEOC's Technical Assistance Review (TAR) feedback letter of August 13, 2020, which directed the GSA to "show meaningful progress toward conducting barrier analysis of the triggers *involving PWD and PWTD* in its next MD-715 report" and to "prioritize the most significant triggers." Of the twelve significant triggers that were identified in FY20, five were prioritized for subsequent barrier investigation, of which the top two trigger priorities specifically addressed EEOC's TAR direction to conduct barrier analyses involving PWD and PWTD. The top five triggers in FY20 that were prioritized for more detailed root cause analyses included:

1. Low participation of PWD and PWTD in mission critical occupations
2. Low participation of PWD and PWTD in high grade levels
3. Low participation of Black Males and Black Females in high grade levels
4. Low participation of Hispanic Males and Hispanic Females in high grade levels
5. Low participation of non-White groups in Senior Executive Service positions

#### FY20 Barrier Analysis Priorities #1 and #2:

Barrier investigations into low participation of PWD and PWTD in mission critical occupations (FY20 Priority #1) and high grade levels (Priority #2) focused first on validating and correcting the accuracy of employee disability status data within GSA's workforce data system. Shortfalls in PWD/PWTD data had previously been identified, and inaccurate data was known to be an impediment to subsequent barrier analysis. Initial FY21 analyses identified several important inconsistencies between relevant data elements within the data system of record, including (a) disability codes, (b) data on appointment authorities that take disability into account, and (c) veterans' preference codes, as well as external information, specifically data relating to requests for reasonable disability accommodations. Further analyses identified additional data gaps relating to both the disability status codes and conversions of employees appointed under the Schedule A(u) authority for individuals with intellectual disabilities, psychiatric disabilities, or severe physical disabilities. Subsequent correction of outdated disability codes and application of criteria from disability-related hiring authorities enabled roughly 1,000 additional PWD and 100 additional PWTD to be positively identified, so that their accurate disability data could be incorporated into subsequent analyses. The addition of those PWD and PWTD significantly raised participation rates of PWD and PWTD in all segments of the workforce, effectively eliminating the highest-priority FY20 trigger (low PWD/PWTD participation in mission critical occupations), enabling efforts to shift to analysis of the next highest priorities: Low participation in high grades of (a) PWD/PWTD, (b) Black employees, and (c) Hispanic employees.

Correction of PWD/PWTD data errors is ongoing; however, to date, the only corrections made *within the employee data system of record* (HR Links) have been 93 PWTD disability codes. All other modifications have thus far been restricted only to temporary changes (i.e., manual adjustments, outside the system of record) necessary to develop accurate FY21 MD-715 data tables and conduct effective analyses. Other inaccurate data within the official system of record has not yet been addressed. Efforts to make permanent changes and/or to expand classification of employees as PWD by using (a) reasonable accommodations data and/or (b) data from hiring authorities that take disability into account (including Schedule A(u)) were placed on hold during FY21, due to extraordinarily heavy demands placed on human resources personnel due to development and implementation of COVID-related return-to-work, vaccination, and religious/disability reasonable accommodation policies and procedures.

FY20 Barrier Analysis Priorities #3 and #4:

Low participation of Black Males and Black Females in high grade levels (Priority #3) was ranked next for barrier investigation, because those two groups have both (a) very high overall participation in the workforce (compared to Census benchmarks) and (b) disproportionately lower participation in higher grade levels. Hispanic Males and Hispanic Females also have low participation in high grades (Priority #4) and very similar grade level distributions; however, they also have lower than expected overall participation in the workforce.

Analysis of low participation in high grades began with refinement of the data triggers, in order to identify more specific grade levels, occupations, geographic regions, and organizational subcomponents affected by those conditions, in order to identify candidates for collaborative EEO and HR investigations into selection practices and their outcomes. That preliminary analysis identified GS-14 and GS-15 selections within GSA Region 11 (the National Capital Region) as an ideal starting point; however, further root cause analyses into those selection practices had to be postponed, because of higher HR priorities (e.g., related to COVID).

In lieu of analysis of selection-related practices and outcomes, barrier investigation efforts instead shifted to (1) systematically assessing policies and procedures related to selections (independent of actual practices); (2) analysis of applicant flow data for mission critical occupations; (3) analysis of use and impacts of various appointment authorities; (4) analysis of procedures, nominations, and selections relating to career development opportunities; (5) analysis of Federal Employee Viewpoint Survey results; (6) analysis of complaints-related data; and (7) engagement with Special Emphasis Programs and affinity groups. Aside from data



relating to employee/applicant demographics and career development; complete, accurate, and timely data from other sources of information (e.g., relating to exit surveys, grievances, reasonable accommodations, and harassment allegations) was not available to support FY21 trigger identification or barrier investigations.

#### Appointment Authority Analysis:

The hiring authorities used for all current GSA employees were identified and evaluated, along with their respective demographic outcomes, both for the overall workforce and focusing on just GS-13, GS-14, and GS-15 positions. Ten hiring authorities were found to account for 76% of all current appointments to the GSA and 25 authorities were found to account for 95% of all appointments. Analysis of those authorities yielded several notable findings:

- The most widely used appointment authority (Appointment Authority Code AYM, used for 13% of current GSA employees) is a direct hire authority.
- Proportional use of the AYM hiring authority increases with grade level (e.g., 14% of GS-13s, 17% of GS-14s, and 18% of GS-15s were appointed under that hiring authority).
- Participation of White Males hired under Authority Code AYM increases significantly with grade level (25% of GS-13s, 32% of GS-14s, and 40% of GS-15s), an overall increase of 61%. Additionally, under AYM, White Males were the only group that increased participation at every increase in grade level.
- Hiring authorities available only to veterans tended to result in higher participation rates for Males (including Black Males and Hispanic Males), relative to Females. Given the generally high proportions of Males among the military services, along with the nature of the National Civilian Labor Force benchmark (which excludes military personnel) those Male-heavy outcomes were expected.
- Hiring authorities that take disability into account (such as Schedule A(u) authorities and authorities associated with disabled veterans<sup>51</sup>) similarly resulted in predictable outcomes that include higher participation rates of PWD and PWTD.

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<sup>51</sup> Appointment authority ZBA (Veterans Employment Opportunity Act (VEOA) authority), J8M (Veterans Recruitment Appointment (VRA) authority), LYM (Conversion of VRA appointees), LZM (Conversion of 30% or More Disabled Veterans)

- Use of the Schedule A(u) appointment authority decreased as grade levels increased (e.g., 0.84% of GS-13s, 0.52% of GS-14s, and 0.21% of GS-15s).
- Analysis of PWD statistics uncovered widespread inconsistencies between OPM veterans' preference codes and disability status codes (which may have been self-identified or agency-designated). Overall, 54% of disabled veteran employees were found to have no disabilities identified within the system of record, in addition to 17% of disabled veterans who self-identified that they did not wish to disclose their disability or serious health condition.

**TABLE 8:** Disability Status of Disabled Veterans within the Employee Data System of Record

<b>Disability Status in System of Record:</b>	<b>PWD</b>	<b>Not Identified</b>	<b>No Disability</b>
<b>Disabled veteran, disability rating of 30% or more</b>	<b>354</b>	<b>212</b>	<b>569</b>
<b>Disabled veteran, disability rating of 10% to 29%</b>	<b>60</b>	<b>23</b>	<b>179</b>
<b>Disabled veteran, disability rating less than 10%</b>	<b>14</b>	<b>5</b>	<b>28</b>
	<b>428</b>	<b>240</b>	<b>776</b>
	<b>30%</b>	<b>17%</b>	<b>54%</b>

- Analysis also uncovered inaccurate OPM disability codes for employees appointed under Schedule A(u) (an excepted hiring authority that requires accurate disability status information after hire). Many Schedule A(u) hires were found in the system of record to have no self-identified disability. Further analysis also found that Schedule A(u) hires have routinely not been converted to the competitive service after two years on probationary status.<sup>52</sup>
- Of the hiring authorities that do *not* specifically take disabilities into account, 82% were found to result in participation rates for PWD and/or PWTD that are significantly below their respective federal goals. Under the most widely used appointment authority (AYM), PWD and PWTD participation rates are roughly 50% of the relevant federal goals and significantly below the rates PWD/PWTD rates associated with the next most widely used appointment authorities.

<sup>52</sup> While not mandatory, conversion of Schedule A(u) hires into the competitive service is the intention of Executive Orders 12125 and 13124. If all eligible Schedule A(u) hires are not converted after two years, agencies must explain in Part J of the annual MD-715 report why they were not.

- An analysis was also conducted of employee demographics by appointment year, to identify potential issues and trends. Employees were grouped according to their year of appointment, using 10-year increments from 1970 to 2010, 5-year increments of 2010-2014 and 2015-2019, and a final increment from 2020-2021. The most notable finding from that analysis was that hires between 2010 and 2021 were found to have self-identified as having a disability at a rate more than 3.4 times that of hires from prior to 2010, despite those earlier hires generally being correspondingly older, and presumably more likely to have acquired relevant reportable disabilities. The data outcomes may be indicative of inaccurate older data that has not been validated or updated and/or may reflect generational perceptions about self-identification; however, the root causes have not yet been explored further, nor has the data yet been correlated by employee age.

Career Development Analysis:

Barrier analysis of career development data focused on correlations with low participation of Hispanics and Blacks in high grade levels; however, it also simultaneously assessed similar issues for PWD and PWTD. Eligibility pools, nomination data, and selection data was analyzed for six different “Competitive Development Program” (CDP) courses offered in FY19, seven courses offered in FY20, and eleven offered in FY21. Nomination data provided for the FY20 CDP cycle included data for each specific CDP course, allowing for more detailed analysis. There were several notable findings from the analysis of the FY20 CDP data:

**TABLE 9:** Selection Rates to FY20 Competitive Development Programs vs. Participation in Nomination Pool

	M	HM	WM	BM	AM	F	HF	WF	BF	AF
<b>CDP1</b>	0%	N/A	0%	N/A	N/A	150%	N/A	150%	N/A	N/A
<b>CDP2</b>	26%	0%	25%	35%	0%	170%	189%	198%	103%	283%
<b>CDP3</b>	70%	51%	67%	77%	154%	132%	154%	140%	77%	154%
<b>CDP4</b>	0%	0%	0%	N/A	N/A	500%	N/A	375%	750%	N/A
<b>CDP5</b>	0%	N/A	0%	0%	0%	164%	383%	164%	0%	128%
<b>CDP6</b>	51%	0%	69%	57%	N/A	135%	114%	147%	114%	171%
<b>CDP7</b>	75%	N/A	75%	N/A	N/A	150%	N/A	N/A	150%	N/A

- Most noteworthy, selections to all seven CDPs were dominated by Female applicants. Of the 91 nominations of Males and 91 nominations of Females, 60 Females (66%)

were selected, while only 17 Males (19%) were selected. The average selection rate for Female demographic groups (compared to expected selection rates) was 198%, while the average selection rate for Male groups was only 33% of their respective expected rates. In three CDPs, zero Male nominees were selected (in one case, despite 80% of nominees being Male). Root cause analysis was conducted into those results. CDP procedures were reviewed, and interviews were conducted with parties involved in the process. Preliminary findings revealed that, despite the triggers, the procedures that were used effectively eliminated gender bias by masking names, sex, and other identifying information.

- Among the seven CDPs offered in FY20, there were zero nominations of Hispanic Males, Hispanic Females, Black Males, or Asian Females to three CDPs and no nominations of Asian Males to four CDPs. Black Females and White Females each received zero nominations to one of the seven CDPs. Cases of zero nominations are depicted in Table 9 using “N/A.”
- One of the CDPs for which there were no Hispanic nominations was only eligible for higher-grade employees (e.g., GS-15 and SES, plus GS-14 with waivers), for which the eligibility pool included 140 Hispanic employees. The second CDP targeted GS-7 thru GS-11, for which the eligibility pool included 105 Hispanic employees. Hispanic eligibility was not calculated for the third CDP, which was for acquisition professionals.
- Among the 21 instances in which Female employees of *any* demographic group were selected to *any* CDP, Female selection rates exceeded expectations in 19 (90.5%) of those cases. In the only two cases where Female groups were *not* selected at or above their expected rates, both involved selection rates of Black Females. In one of those cases, Hispanic, White, Asian, and Two or More Races Females were selected (six of fourteen nominees overall); however, neither of the two Black Female nominees (nor any of the nine Male nominees) were selected.

Analysis of FY21 (and FY19) CDP data was less comprehensive because nominee data provided was not broken down by individual CDPs and because eligibility criteria varied across grade level boundaries. Using FY20 eligibility criteria from the same CDPs, as well as grade levels for each FY21 nominee and selectee, each of the eleven FY21 programs was consolidated into one or more of the seven relevant MD-715 table categories (e.g., GS-13/GS-14/GS-15/SES and Supervisors/Managers/Executives). Nominee feeder pools and overall

eligibility pools were generated based on corresponding grade levels. Table 10 depicts the rates of FY21 nominations, relative to their respective feeder pools (e.g., employees eligible for each CDP, based on grade level).

FY22 analyses plan to more closely evaluate the nomination process, to assess whether the CDPs rely on employee applications, supervisor nominations, or both, in order to more effectively investigate root causes for the identified issues.

**TABLE 10:** Nomination Rates to FY21 Competitive Development Programs vs. Participation Rates in Eligibility Pool

	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
GS13	57%	153%	103%	137%	75%	87%	25%	145%	43%	83%
GS14	75%	160%	98%	109%	124%	95%	22%	127%	52%	149%
GS15	89%	101%	95%	96%	129%	137%	14%	131%	53%	163%
SES	63%	0%	102%	78%	113%	189%	0%	189%	43%	170%
Supervisors	55%	168%	97%	137%	74%	95%	25%	148%	45%	88%
Managers	81%	174%	94%	106%	126%	102%	21%	130%	59%	155%
Executives	73%	0%	101%	79%	118%	188%	0%	182%	49%	197%

With regard to FY21 CDP, notable findings are as follows:

- Across all seven MD-715 table categories, eligible Hispanic Males were nominated at rates below their expected levels (averaging 70% of expected rates). Asian Male nominations were even further below expected levels in all categories (15%, on average). PWD nomination rates averaged only about 50% of expected rates.
- Across the spectrum of MD-715 table categories, eligible Asian Females were nominated at higher-than-expected levels (150% higher, on average).
- Hispanic Females were nominated for CDPs equivalent to the GS-13, GS-14, and GS-15 MD-715 categories and the Supervisors and Managers categories at higher than expected levels but had zero nominations to either the SES-level or Executive categories.
- Black Males and Black Females had higher than expected nomination rates to the GS-14, GS-15, and SES MD-715 categories, as well as to the Manager and Executive categories (averaging 122% and 142% higher, respectively, for Black Males and Black Females).

Analysis of CDP Return on Investment:

Separate from analysis of nominations and selections, an analysis was also conducted to assess the possible return on investment (ROI) of the CDPs. FY19 CDP data was used, because it allowed for a two-year span (following selection) for relevant outcomes to manifest and be assessed. The analyses compared data between (a) un-nominated employees, (b) employees who were nominated but not selected, and (c) employees who were selected. Performance measures included: (1) retention, (2) average pay increases, (3) increases in grade level, (4) elevation to the Senior Executive Service, (5) changes in occupational series, and (6) grade level decreases. Results are shown in Table 11.

**TABLE 11:** Competitive Development Program Return on Investment Analysis

	Unnominated GS-12/13/14/15	Nominated but Not Selected	Selected
<b>Still in GSA</b>	84.4%	91.7%	94.5%
<b>Avg Pay Increase</b>	8.09%	9.84%	9.64%
<b>Grade Increases</b>	10.6%	19.4%	27.5%
<b>Became SES in GSA</b>	0.07%	0.0%	0.0%
<b>Grade Decreases</b>	0.8%	1.4%	2.8%
<b>Series Changes</b>	8.3%	13.9%	25.7%

The outcomes of the ROI analysis show apparent correlations between selections to CDPs and:

- Retention: Although not all FY19 CDP selectees remained in GSA for two years after selection, they were more likely to remain in the agency than non-selected nominees, and 12% more likely to remain in the agency than un-nominated employees.
- Grade level increases: Selectees had grade level increases at 142% the rate of those who were nominated but not selected and 259% the rate of un-nominated employees.
- Grade level *decreases*: Interestingly, program selectees also had grade level decreases at more than four times the rate of un-nominated employees and twice the rate of employees who were nominated but not selected. Note: A total of 86 employees had grade level decreases, including 3 of the CDP selectees and 1 unselected nominee, so the data set for this measure is rather limited. Reasons for this were not explored further; however, telework opportunities and/or COVID impacts may have been factors.

- Changes in occupational series: Program selectees were more than three times as likely to change their occupational series than unominated employees and almost twice as likely to change series as unselected nominees. Deeper analysis was conducted to determine if the series changes were reflective of situations where employees might have overcome “glass wall” barriers (i.e., associated with limited advancement opportunities within their original series); however, the majority of the changes were found to be moves from one mission critical occupation into another.

#### Organizational Climate Survey Analysis:

Analyses were conducted into various elements of the Federal Employee Viewpoint Surveys (FEVS) from 2015 thru 2020. Many previous FEVS versions were analyzed to assess various content and indices that evolved throughout that period. The most notable findings were:

- Hispanic perceptions: The 2020 FEVS included 38 measures. In 36 (95%) of those measures, the perceptions of Hispanic participants were more negative and/or less positive than non-Hispanic participants. Additionally, the rate of *negative* perceptions among Hispanics on the measure “I can disclose a suspected violation of any law, rule, or regulation without fear of reprisal” was 44% higher than non-Hispanics.
- More than 25% of survey participants in the FEVS from 2015 thru 2018 had negative perceptions regarding the measure: “Promotions in my work unit are based on merit.” That measure was eliminated in subsequent FEVS (along with the New IQ index).
- GSA’s employee response rate in the 2020 FEVS was the second highest among all comparable agencies Government-wide. Overall, GSA Employee Engagement Index (EEI) scores increased 5% over 2019 and were higher than Government-wide averages, both overall and within each of the three individual EEI subfactors.

#### Complaints Analysis:

- Data relating to EEO complaints was obtained from Annual Federal EEO Statistical Reports of Discrimination Complaints (EEOC Form 462) from FY18 thru FY21.
- The analysis evaluated relevant *activities* (e.g., pre-complaints, settlements, alternative dispute resolutions, final agency decisions (FADs), and final orders); *issues* (e.g., promotions/non-selections); and *bases* (race or national origin) to assess alleged discrimination. Additionally, the analysis also looked at overall complaints volume.

**TABLE 12:** Promotion/Non-Selection Complaints & Settlements, per Employee

	Hispanic	White	Black	Asian
FY18	0.00%	0.05%	0.27%	0.00%
FY19	0.00%	0.02%	0.26%	0.00%
FY20	0.13%	0.03%	0.07%	0.25%
FY21	0.24%	0.00%	0.13%	0.00%

**TABLE 13:** Total Complaints & Settlements, per Employee

	Hispanic	White	Black	Asian
FY18	0.64%	0.08%	0.78%	0.00%
FY19	0.28%	0.05%	0.55%	0.53%
FY20	0.40%	0.09%	0.66%	0.50%
FY21	0.48%	0.01%	0.45%	0.00%

Relevant Findings:

- In FY21, per employee, Hispanics had the highest rate of overall complaints/settlements of the four largest demographic groups (Hispanic, White, Black, and Asian), as well as the highest rate of complaints/settlements involving promotion/non-selection. Blacks had the second highest rates among both categories (promotion/non-selection and overall complaints/settlements).
- In FY20, Blacks had the highest rate of overall complaints/settlements, followed by Asians and Hispanics. For complaints/settlements involving promotion/non-selection, Asians had the highest rate, followed by Hispanics.
- In FY19, Blacks and Asians had the highest rates of overall complaints/settlements; however, Blacks had by far the highest rate of complaints/settlements involving promotion/non-selection.
- In FY18, Blacks had the highest rates of complaints/settlements overall (the highest in four years of any of the four largest demographic groups), followed by Hispanics. Blacks also had the highest rate of complaints/settlements involving promotion/non-selection (also the highest rate of any group in the past four years).



FY20 Barrier Analysis Priority #5:

Low participation of non-White groups in SES positions was not investigated in FY21, due to efforts focusing instead on the four higher-priority barrier analysis topics.

Re-Alignment and Expansion of Mission Critical Occupations (MCOs):

In FY18, FY19, and FY20, the GSA developed and reported MD-715 data for only eight MCOs. For FY21, the list was expanded to ten MCOs (see Table 14, below), based on the criteria in the EEOC Instructions. Expansion of the MD-715 MCOs also considered using differently defined “mission critical occupations” tracked independently by the GSA Office of Human Resources Management. Seven of the eight previous MD-715 MCOs were retained for FY21 (series 0301, 0343, 0905, 1101, 1102, 1170, and 2210). Series 0201, 0501, and 0560 were added, as they have, relative to the other series, (a) large populations and (b) robust career paths to senior leadership positions (as well as being important to fulfilling agency missions). Series 1176 was removed from the list of previously analyzed and reported MCOs, as it is neither as populous, nor does it offer as robust a career path to senior leadership positions, relative to other MCO candidates. In total, the ten FY21 MCOs account for 69% of the overall workforce and 84% of all GS-14 thru SES positions, including 85% of GS-14 positions, 88% of GS-15 positions, and 37% of SES positions (a majority of which use occupational series 0340).

**TABLE 14:** GSA FY21 Mission Critical Occupations

2014-2018 OPM SERIES	OPM SERIES TITLE (December 2018)	WORK FORCE IN SERIES	% OF WORK FORCE	2014-2018 CENSUS CODE
1102	CONTRACTING	1902	16.2%	0530
1101	GENERAL BUSINESS AND INDUSTRY	1696	14.4%	0750
0343	MANAGEMENT AND PROGRAM ANALYSIS	1214	10.3%	0710
0301	MISCELLANEOUS ADMINISTRATION AND PROGRAM	1153	9.8%	0750
2210	INFORMATION TECHNOLOGY MANAGEMENT	745	6.35%	0110
1170	REALTY	556	4.74%	4920
0560	BUDGET ANALYSIS	242	2.06%	0820
0501	FINANCIAL ADMINISTRATION AND PROGRAM	231	1.97%	0810
0201	HUMAN RESOURCES MANAGEMENT	197	1.68%	0136
0905	GENERAL ATTORNEY	166	1.41%	2100

Expansion and refinement of GSA’s MCOs improves access to data necessary to more effectively analyze new hires and internal competitive promotions, which in turn relate to high-priority triggers associated with low participation of demographic groups in high grades.

## E.9 Accomplishments

In FY21, GSA had several noteworthy accomplishments:

- GSA established an Equity Team in January 2021, and in May 2021, the Equity Team introduced a new blog series to expand agency-wide communications relating to DEIA (a collaborative partner program to EEO and other relevant EEO-related programs).
- Results of the 2020 Federal Employee Viewpoint Survey were released in January, 2021. GSA's employee response rate was the second highest among comparable agencies Government-wide, GSA's Employee Engagement Index scores increased 5% over 2019 and remained higher than the Government-wide averages, both overall and within each of the individual Employee Engagement Index subfactors.
- In January, 2021, the Office of Civil Rights developed new posters with updated information on EEO and associated points of contact. Posters were disseminated to the GSA central office, regions, and field offices and confirmed to be on display agency wide.
- In February 2021, GSA resumed providing unconscious bias training. In FY21, the Office of Civil Rights trained a total of 2,585 employees (22% of the workforce), more than twice the number of employees trained in FY20.
- In March 2021, GSA hired a new Affirmative Employment Program Manager (AEPM), filling a critical position that had been gapped for two years and thereby revitalizing its compliance assessment, barrier analysis, reporting, and other capabilities relating to MD-715 execution.
- Beginning in April 2021, the AEPM briefed each of the Special Emphasis Program Managers (SEPMs), SEP members, and their respective executive sponsors on tailored MD-715 data analyses and findings relevant to their respective programs and constituents.
- In April 2021, GSA strengthened its understanding and awareness of subordinate component SEPs and affinity groups through a series of collective meetings and individual engagements with each group and their respective executive sponsors.
- In May, 2021, GSA began a DEIA Speaker Series featuring recognized leaders and diversity professionals whose efforts, experiences, and advocacy inspired greater appreciation for inclusive excellence and encouraged diverse ideas, perspectives, and viewpoints.

- In June 2021, GSA appointed a full-time Senior Advisor to the Administrator on Equity.
- In June, 2021, GSA's principal EEO official retired. The Deputy Associate Administrator for the Office of Civil Rights (OCR) then served as Acting Associate Administrator, maintaining continuity of important OCR programs and operations until formally appointed as the new Associate Administrator for OCR in November, 2021.
- In July, 2021, the new GSA Administrator was sworn in. A new EEO policy statement in October, 2021.
- A new agency-level Reasonable Accommodations Coordinator was hired in July, 2021.
- GSA's reasonable accommodations policy and procedures<sup>53</sup> were updated in FY21 and subsequently reviewed and acknowledged by EEOC as being fully compliant with Section 501 of the Rehabilitation Act of 1973.
- In August, 2021, GSA created a new program, DEIA Dialogues, to encourage meaningful conversations about diversity within GSA. The series includes structured forums led by trained Federal Mediation and Conciliation Service facilitators and allows participants to explore topics such as hidden bias, microaggressions, and intersectionality.
- In September, 2021, GSA delivered DEIA Leadership Training: "The Power of Inclusive Leadership: Using Inclusive Intelligence to Improve Teamwork, Resilience, Innovation, and Productivity" to all supervisors across GSA. The workshop blended science-based research and interactive exercises designed to produce better and smarter teams and organizations and taught participants the importance of working with diverse employees using inclusive mindsets, behaviors, and skills to enhance relationships and achieve optimal team results.
- After the end of the fiscal year, in November, 2021, GSA hired a DEIA Program Manager, filling another critical position that had been gapped for three years and providing the necessary partnership to OCR and the newly AEPM.
- Beyond providing formal training to just supervisors and managers, GSA requires *all employees* to regularly receive comprehensive training covering all EEO topics addressed in the Part G self-assessment. At the end of FY21, 99.98% of all employees and 99.89% of all supervisors/managers were compliant with those training requirements.

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<sup>53</sup> Covering all of GSA, except the GSA Office of the Inspector General.

- The Deputy Administrator issued communications encouraging employees to collaborate, inspire community advocacy, foster leadership, and promote belonging of all employees through involvement in SEPs, Affinity Groups, and DEIA Employee Associations.
- The GSA revitalized its Persons with Disabilities Special Emphasis Program (PWD SEP), formally establishing co-program managers and an SES executive sponsor and providing widespread communications with strong, visible support from the GSA Administrator, Deputy Administrator, Office of Human Resources Management (OHRM), and OCR.
- Course offerings of the GSA Competitive Development Program (CDP) were expanded from six courses in FY19 and seven courses in FY20 to eleven courses in FY21. Analysis of CDP data found notable return on investment, demonstrated by higher retention, pay, advancement, and career mobility of CDP graduates, relative to non-participants.
- GSA conducted the most comprehensive assessment of Part G compliance since the revised EEOC checklist was first implemented in FY18. That assessment uncovered numerous previously unidentified deficiencies, enabling the GSA to resolve those issues and to simultaneously improve both compliance and EEO-related performance.
- GSA resolved two FY20 Part G compliance assessment deficiencies (measures E.1.a (untimely EEO counseling) and E.1.h (untimely processing of final agency decisions)). Subsequently, in October, 2021, GSA also resolved the FY20 deficiency of measure B.1.a.2 (depiction of the EEO office reporting relationship within the agency organizational chart).
- Data and performance metrics for the independent GSA Office of the Inspector General reasonable accommodations program were incorporated into the annual GSA MD-715 assessment, providing comprehensive evaluation and reporting of agency-wide reasonable accommodation compliance for the first time.
- GSA conducted systematic barrier analyses of its highest-priority triggers, in accordance with senior leadership priorities and EEOC Technical Assistance Review.
  - Barrier investigations of PWD/PWTD participation triggers resulted in identification and updating of incorrect disability status codes for 93 employees not being classified as either PWD or PWTD, thereby improving the PWD participation rate by 8% and PWTD rate by 40%. Further efforts resulted in classification of more than 1,000 other

employees as PWD, increasing the participation rate of PWD by 80%, effectively eliminating the highest-priority FY20 data trigger (low participation of PWD and PWTD in mission critical occupations). As a result:

- For the first time ever, GSA exceeds federal goals for PWD and PWTD in both the GS-1 to GS-10 grade level cluster and the GS-11 to SES grade level cluster.
- GSA also exceeds PWD and PWTD federal goal participation benchmarks in 19 of 20 mission critical occupations measures, as well as among new hires to the permanent workforce.
- GSA mission critical occupations assessed under MD-715 were expanded from eight to ten occupational series and aligned (where practicable) with similar critical series lists tracked by the GSA Office of Human Resources Management.
- GSA developed an Alternative Benchmark Tool to facilitate benchmarking of FY21 MD-715 data tables using 2014-2018 Census data, improving upon use of the older 2010 Census data. The tool provides revised National Civilian Labor Force rates, as well as Occupational Civilian Labor Force benchmarks for all OPM occupations and Census codes, and also automatically calculates relevant alternative benchmarks. The tool was designed to be both comprehensive and scalable, so that it can be used by any agency or subcomponent, regardless of size, and was shared with peers in other federal agencies to support their MD-715 efforts.

## E.10 Planned Activities

In FY22 GSA intends to:

- Systematically address each identified Part G deficiency.
- Improve OCR engagement with responsible officials identified in MD-715 Part H plans, along with their respective designated subject matter experts, in order to facilitate more effective oversight and tracking of efforts to resolve identified Part G deficiencies.
- Improve collaboration between the OCR and OHRM on execution and reporting of MD-715 assessment activities, including, but not limited, to annual compliance evaluations, trigger identification, and barrier analysis.
- Initiate improvements in all four aspects of GSA's Affirmative Action Plan for PWD, including recruitment, hiring, advancement, and retention, with specific goals of revitalizing critical related programs, including, but not limited to, the Selective Placement Program, Disabled Veterans Affirmative Action Program, and programs relating to proactive use of hiring authorities that take disability into account.<sup>54</sup>
- Pursue establishment of agency-specific goals for overall PWD and PWTD participation in the workforce that are 50% higher than the respective federal goals (i.e., 18% for PWD and 3% for PWTD).
  - Improve management and oversight of Schedule A(u) hiring, with specific goals of proactively tracking performance and eligibility of Schedule A(u) hires throughout their respective probationary periods; maximizing eligibility and conversion of Schedule A(u) hires after completion of probationary periods; as well as timely compiling of Schedule A(u) data and information required to support MD-715 analyses, assessments, and reporting obligations.
  - Pursue mechanisms to enable use of data from appointment authorities that take disabilities into account to classify employees as PWD.
  - Pursue mechanisms to enable use of data from requests for disability-related reasonable accommodations to classify employees as PWD.

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<sup>54</sup> For example, Schedule A(u), 30% Disabled Veterans, VRA, VEOA, and the Workforce Recruitment Program

- Explore mechanisms to formalize and broaden GSA's recognition of employees, supervisors, managers, and organizational subcomponents for superior accomplishment in EEO.
- Develop and execute barrier analyses of agency-level priorities in collaboration with relevant GSA subordinate services, offices, regions, and programs.
- Develop EEO training specifically tailored for senior leaders.
- Develop and test improved mechanisms for tracking processing of requests for reasonable accommodations, including enhanced data system capabilities and related protocols, in order to improve data accuracy, automate flagging of requests approaching or exceeding established deadlines, and add new data elements to enable tracking of implementation of approved accommodations.

## Part F – Certification of Establishment of Continuing EEO Programs

Aluanda Drain, Associate Administrator of the Office of Civil Rights, is the Principal EEO Official for the U.S. General Services Administration (GSA).

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

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

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



**Aluanda Drain**  
Associate Administrator, Office of Civil Rights

5/27/2022  
Date

I certify that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.



**Robin Carnahan**  
Administrator, General Services Administration

5/27/2022  
Date

[Signed versions are on file with the U.S. Equal Employment Opportunity Commission.]



## Part G – EEO Program Self-Assessment Checklist

GSA conducted a mandatory annual assessment of its EEO Program by completing the MD-715 Part G Checklist. This checklist will be submitted to the EEOC via EEOC's Federal Sector EEO Portal (FedSEP) and supporting documentation and data maintained within GSA OCR.

The current version of the Part G checklist was first introduced in FY18 and made significant changes to the previous assessment checklist. It replaced subjective assessment questions with objective measures, raised the standard of compliance to 100%, and introduced 85 new assessment measures, increasing the total number of compliance measures from 121 to 156.



During GSA's first three years using the checklist (FY18, FY19, and FY20), GSA did not have staff members trained to effectively assess the new compliance measures, resulting in under-reporting of GSA deficiencies during those years. In FY21, GSA hired additional trained staff and was thus able to execute a more comprehensive self-assessment than those formerly conducted, resulting in the identification of significantly more deficiencies in FY21 than previously reported (thirty deficiencies were identified for FY21, compared to six in FY20, ten in FY19, and twelve in FY18). Table 15 on the next page summarizes all identified FY21 deficiencies, after which follows the official EEOC Part G self-assessment checklist in its entirety.

**TABLE 15:** FY21 Part G Self-Assessment Deficiencies

Measure					Questions	Part H
1	A	2	b	1	Does the agency prominently post the business contact information for its Special Emphasis Program Managers throughout the workplace and on its public website?	H.1
2	B	3	b		Does the agency's current strategic plan reference EEO / diversity and inclusion principles? If "yes", identify the EEO principles in the strategic plan in the comments column.	H.3 <sup>55</sup>
					Has the agency allocated sufficient funding and qualified staffing to:	
3	B	4	a	1	Conduct a self-assessment of the agency for possible program deficiencies?	H.4
4	B	4	a	2	Conduct a thorough barrier analysis of its workforce?	H.5
5	B	4	a	7	Maintain accurate data collection/tracking systems for workforce and applicant flow data?	H.6
6	B	4	a	9	Effectively manage its anti-harassment program?	H.7
7	B	4	a	10	Effectively manage its reasonable accommodation program?	H.8
					Have all managers and supervisors received training on their responsibilities regarding:	
8	B	5	a	1	The EEO Complaint Process?	H.9
9	B	5	a	2	Reasonable Accommodation Procedures?	H.9
10	B	5	a	3	Anti-Harassment Policy?	H.9
11	B	5	a	4	Supervisory, managerial, communication, and interpersonal skills in order to supervise effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications?	H.9
12	B	5	a	5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?	H.9
13	C	2	a	5	Are inquiries begun of all harassment allegations within 10 days of notification, including those initially raised in the EEO complaint process? What is the percentage of timely-processed inquiries?	H.10
14	C	2	b	5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? What is the percentage of timely-processed requests?	H.11
15	C	4	c		Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables?	H.12
16	C	4	d		Does the HR office timely provide the EEO office access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request?	H.13
					Does the EEO office collaborate with the HR office to:	
17	C	4	e	1	Implement the Affirmative Action Plan for PWD?	H.14
18	C	4	e	2	Develop and/or conduct outreach and recruiting initiatives?	H.15
19	C	4	e	4	Identify and remove barriers to EEO in the workplace?	H.16
20	C	4	e	5	Assist in preparing the MD-715 report?	H.17
21	D	1	b		Does the agency regularly use the following sources of information for <u>trigger identification</u> : Workforce data, complaint/grievance data, exit surveys, focus groups, affinity groups, special emphasis programs, reasonable accommodation program, anti-harassment program, and external special interest groups?	H.18
22	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?	H.19
23	D	2	d		Does the agency regularly review the following sources of information <u>to find barriers</u> : Complaint/grievance data, exit surveys, focus groups, affinity groups, anti-harassment program, special emphasis programs, reasonable accommodation program, and external special interest groups?	H.20
24	D	4	b		Does the agency take specific steps to ensure qualified PWD are encouraged to apply for vacancies?	H.21
25	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?	H.22
					Does the agency have systems in place to accurately collect, monitor, and analyze:	
26	E	4	a	2	The race, national origin, sex, and disability status of agency employees?	H.23
27	E	4	a	3	Recruiting activities?	H.24
28	E	4	a	4	External & internal applicant flow data concerning applicants' race, national origin, sex, and disability status?	H.25
29	E	4	a	5	The processing of requests for reasonable accommodation?	H.26
30	E	4	a	6	The processing of complaints for the anti-harassment program?	H.27



<sup>55</sup> Plan Part H.2 closes out a prior-year deficiency in measure B.1.a.2, regarding the agency organizational chart.

## MD-715 - PART G Agency Self-Assessment Checklist

<b>Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP</b>			
<b>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</b>			
 Compliance Indicator			
 Measures	<b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.1.a</b>	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes”, please provide the annual issuance date in the comments column. [see MD- 715, II(A)]	Yes	The Administrator was sworn into office on July 2, 2021 and issued an EEO Policy Statement on October 1, 2021.
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation, and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	



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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.2.a</b>	A.2 – The agency has communicated EEO policies and procedures to all employees.		
<b>A.2.a.1</b>	Does the agency disseminate the following policies and procedures to all employees?		
<b>A.2.a.1</b>	Anti-harassment policy? [see MD 715, II(A)]	Yes	
<b>A.2.a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes	
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website?		
<b>A.2.b.1</b>	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	No	All business contact information is posted prominently on public websites, except for contact information for GSA Special Emphasis Programs. See plan Part H.1.
<b>A.2.b.2</b>	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R §1614.102(b)(5)]	Yes	
<b>A.2.b.3</b>	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	<a href="https://www.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-23001-hrm-chge-3">https://www.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-23001-hrm-chge-3</a>



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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>A.2.c</b>	Does the agency inform its employees about the following topics?:		
<b>A.2.c.1</b>	EEO complaint process? [see 29 CFR § 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	All employees are informed during initial onboarding, as well as via training required within 90 days of accession and biennially thereafter. Employees who are supervisors or managers also receive formal EEO training, which is required within one year of accession or assignment to those positions, and at least once every three years thereafter.
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	Comment for A.2.c.1 applies.
<b>A.2.c.3</b>	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	Comment for A.2.c.1 applies.
<b>A.2.c.4</b>	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors(1999), § V.C.1] If “yes”, please provide how often.	Yes	Comment for A.2.c.1 applies.
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Employees are informed during initial onboarding and subsequently via biennial training.

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 <b>Compliance Indicator</b>  <b>Measures</b>	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	Complaint statistics are shared at least quarterly among Regional Administrators, and improvements and other EEO statistics are noted in the discussion.
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	

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<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION</b> <b>This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.1.a</b>	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission- related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	N/A	
<b>B.1.a.2</b>	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	The FY20 deficiency in this measure was corrected in October, 2022, by the publishing of an updated organizational chart at <a href="https://www.gsa.gov/about-us/gsa-organization">https://www.gsa.gov/about-us/gsa-organization</a> . See plan Part H.2.
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I)] If "yes", please provide the date of the briefing in the comments column.	Yes	August 2, 2021
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues?[see MD-715, II(B)]	Yes	

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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)]	Yes	
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)]	Yes	
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>B.2.g</b>	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR § 1614.102(c)(2) and (c)(3)]	N/A	GSA does not have subordinate components.





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 <b>Compliance Indicator</b>  <b>Measures</b>	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	No	GSA's five-year Strategic Plan (released March 2022) references both externally and internally facing Diversity, Equity, Inclusion, and Accessibility (DEIA) principles; however, it does not address equal employment opportunity principles. GSA intends to incorporate internally facing DEIA and EEO principles in its next Human Resources Strategic Plan. See plan Part H.3.



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
<b>B.4.a.1</b>	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	No	The anti-harassment and reasonable accommodations programs were unable to generate data needed to conduct the self-assessment in FY21. Staffing was identified as a contributing factor impacting both programs. Data on Schedule A(u) employee conversions (and explanations for non-conversions) assessed in Part J, Section V.A.1 was not provided in FY20 or FY21. See plan Part H.4.
<b>B.4.a.2</b>	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	No	HR resources were not available to support barrier investigations of triggers identified in the FY20 annual Agency EEO Program Status Report. See plan Part H.5.
<b>B.4.a.3</b>	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105 (b) - (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	
<b>B.4.a.4</b>	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	



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 <b>Compliance Indicator</b>  <b>Measures</b>	B.4 (CONTINUED) - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
<b>B.4.a.5</b>	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR § 1614.102(c)(2)]	Yes	
<b>B.4.a.6</b>	to publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
<b>B.4.a.7</b>	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	No	Applicant flow data lacks numbers of interviewed applicants. Collection of employee disability status information does not ensure accuracy of Schedule A(u) hires or address inconsistencies between disability codes, requests for reasonable accommodations, or appointments under other hiring authorities that take disability into account. Employee data management does not address instances where employee race/ethnicity data is suspected of being incorrect or inconsistencies between veterans' preference codes and veteran-related hiring authorities. See plan Part H.6.
<b>B.4.a.8</b>	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and Persons with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes	





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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 (CONTINUED) - The agency has sufficient budget and staffing to support the success of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
<b>B.4.a.9</b>	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), §V.C.1]	No	Effectiveness was impacted by heavy demands placed on HR personnel due to development and implementation of COVID-related return-to-work, vaccination, and religious/disability reasonable accommodation policies and procedures. See plan Part H.7.
<b>B.4.a.10</b>	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	No	Comment for B.4.a.9 applies. See plan Part H.8.
<b>B.4.a.11</b>	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes	
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	

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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>		
<b>B.5.a</b>	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
<b>B.5.a.1</b>	EEO Complaint Process? [see MD-715(II)(B)]	No	At the end of FY21, two of GSA's 1,739 supervisors/managers were overdue for a training course that covers their responsibilities in all five topic areas described in measure B.5.a. Both deficient supervisors subsequently completed the training course in FY22. See plan Part H.9.
<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	No	
<b>B.5.a.3</b>	Anti-Harassment Policy? [see MD-715(II)(B)]	No	
<b>B.5.a.4</b>	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	No	
<b>B.5.a.5</b>	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	No	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes	
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes	
<b>B.6.c</b>	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes	
<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [see 29 CFR § 1614.102(a)(5)]	Yes	

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<b>Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</b> This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	GSA has a centrally managed and operated civil rights program. There are no separate programs run by subcomponents
<b>C.1.b</b>	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR § 1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	Comment for C.1.a applies. Suborganization data is generated in Table 2 and analyzed for triggers annually.
<b>C.1.c</b>	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	Comment for C.1.a applies.



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.2.a</b>	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC’s enforcement guidance? [see MD- 715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors, EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.2.a.1</b>	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Guidance on Vicarious Liability]	Yes	
<b>C.2.a.2</b>	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
<b>C.2.a.3</b>	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see EEOC Guidance on Vicarious Liability]	Yes	
<b>C.2.a.4</b>	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see EEOC Guidance on Vicarious Liability]	Yes	
<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dept of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comments column.	No	The anti-harassment program did not provide data in FY20 or FY21 to assess this measure or calculate the percentage of timely-processed inquiries. See plan Part H.10.
<b>C.2.a.6</b>	Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29CFR 1614.203(d)(3)]	Yes	

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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.2 (CONTINUED) – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	
<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	
<b>C.2.b.5</b>	Does the agency process all accommodation requests 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 in the comments column.	No	Approximately 25% of FY21 requests for reasonable accommodations were not timely processed. Data was not accurate and complete enough to calculate the exact percentage of timely processed requests. See plan Part H.11.
<b>C.2.c</b>	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	Yes	<a href="https://www.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-23001-hrm-chge-3">https://www.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-23001-hrm-chge-3</a>





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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
<b>C.3.b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes	
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes	
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes	
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	Yes	



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes	
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors, EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.3.b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes	
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR § 1614.102(c)(2)]	Yes	
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR § 1614.102(c)(2)]	Yes	



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
<b>C.4.b</b>	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.4.c</b>	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	No	All available data was provided to the EEO office; however, not all data was accurate and/or complete. See plan Part H.12.
<b>C.4.d</b>	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	No	Complete and accurate data on exit interviews or grievances was not timely provided in FY21. See plan Part H.13.



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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.4.e</b>	<b>C.4 (CONTINUED) – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>		
	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities?[see 29 CFR §1614.203(d); MD-715, II(C)]	No	GSA did not collaborate in FY21 on implementation of the Affirmative Action Plan or on outreach and recruitment, trigger identification, or barrier analysis. See plan Part H.14.
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	No	Answer to C.4.e.1 applies. See plan Part H.15.
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	No	Answer to C.4.e.1 applies. See plan Part H.16.
<b>C.4.e.5</b>	Assist in preparing the MD-715 report? [see MD-715, II(C)]	No	Collaboration on Part G, Part H, Part I, and Part J was insufficient to fulfill agency MD-715 obligations associated with those sections. See plan Part H.17.



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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>		
<b>C.5.a</b>	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	
<b>C.5.b</b>	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR § 1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	Zero (0)
<b>C.5.c</b>	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes	



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 <b>Compliance Indicator</b>  <b>Measures</b>	C.6 – The EEO office advises managers/supervisors on EEO matters.	<b>Measure Met?</b> (Yes/No/NA)	<b>Comments</b>
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	The principal EEO official (Associate Administrator, Office of Civil Rights) provides senior leadership with a formal annual “State of the Agency” briefing covering the status and progress of the agency on efforts to meet all EEO-related obligations covered by MD-715. Additionally, various members of the Office of Civil Rights engage independently with senior leaders and program managers on matters such as environmental justice, workforce and applicant demographics, barrier analysis, and special emphasis programs, as well as diversity, equity, inclusion, and accessibility (DEIA) matters.
<b>C.6.b</b>	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	



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<p align="center"><b>Essential Element D: PROACTIVE PREVENTION</b></p> <p align="center"><b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b></p>			
<p align="center">   <b>Compliance Indicator</b>    <b>Measures</b> </p>	<p><b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b></p>	<p align="center"><b>Measure Met? (Yes/No/NA)</b></p>	<p align="center"><b>Comments</b></p>
<p align="center"><b>D.1.a</b></p>	<p>Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]</p>	<p>Yes</p>	
<p align="center"><b>D.1.b</b></p>	<p>Does the agency regularly use the following sources of information for trigger identification: workforce data, complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union/program evaluations, special emphasis programs, reasonable accommodation program, anti-harassment program, and/or external special interest groups? [see MD-715 Instructions, Sec. I]</p>	<p>No</p>	<p>Key referenced sources of information were not sufficiently timely, accurate, and complete to fully support trigger identification (e.g., exit survey data is incomplete, harassment data was not provided, reasonable accommodation data is inaccurate and incomplete, workforce data has inaccurate disability status information, and data is not maintained on Schedule A(u) conversions). See plan Part H.18.</p>
<p align="center"><b>D.1.c</b></p>	<p>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)]</p>	<p>No</p>	<p>GSA does not conduct exit surveys that contain the required questions relevant to persons with disabilities. See plan Part H.19.</p>

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 <b>Compliance Indicator</b>  <b>Measures</b>	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program, anti-harassment program, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	No	Key referenced sources of information are not sufficiently timely, accurate, and complete to fully support barrier investigations (e.g., exit survey data is incomplete, harassment data was not provided, reasonable accommodation data is inaccurate and incomplete). See plan Part H.20.





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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.3.a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	N/A	No barriers elimination plans were required in FY21.
<b>D.3.b</b>	If the agency identified barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	N/A	
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	N/A	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an Affirmative Action Plan for Persons with Disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<a href="https://www.gsa.gov/reference/civil-rights-programs/office-of-civil-rights-library">https://www.gsa.gov/reference/civil-rights-programs/office-of-civil-rights-library</a>
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified Persons with Disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	No	GSA did not conduct outreach or recruitment activities in FY21 focused on recruitment and hiring of PWD or PWTD. See plan Part H.21.
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
<b>D.4.d</b>	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)]	No	GSA has not set agency-specific participation goals for PWD or PWTD and did not undertake applicable efforts in FY21 focused on raising participation rates of PWD or PWTD. See plan Part H.22.



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<b>Essential Element E: EFFICIENCY</b>			
<b>This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR § 1614.105?	Yes	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR § 1614.105(b)(1)?	Yes	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes	
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Yes	The average processing time in FY21 was 25 days.
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR § 1614.102(b)(6)?	Yes	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR § 1614.108?	Yes	
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR § 1614.108(g)?	N/A	



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 <b>Compliance Indicator</b>  <b>Measures</b>	E.1 (CONTINUED) - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR § 1614.110(b)?	Yes	
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR § 1614.110(a)?	Yes	
<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	In the event that any contractor provides a poor work product, revisions are requested and carefully assessed. If systematic issues arise, such as inexcusable delays in processing times, the contract could be terminated and/or key personnel could be replaced.
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	Employees are held accountable for performance objectives through GSA's performance management process, consistent with merit system principles, due process rights, GSA policies, and applicable related requirements.
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments Revised Indicator</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If “yes”, please explain.	Yes	OCR has a full time, in-house attorney serving as advisor on EEO matters.
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	Comment for E.2.a applies
<b>E.2.c</b>	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	N/A	Comment for E. 2.a applies
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.e</b>	If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1,2004)]	N/A	



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR § 1614.102(b)(2)]	Yes	
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	



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 <b>Compliance Indicator</b>  <b>Measures</b>	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes	
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	No	Data on race/ethnicity and disability status is not accurately collected or monitored. Data is primarily self-identified by employees; however, inaccurate employee race/ethnicity and disability status inputs are not consistently addressed. When inputs are not voluntarily provided by employees, data is generated by the agency; however, some final data entries are inconsistent with regulations and OPM guidance. See plan Part H.23.
<b>E.4.a.3</b>	Recruitment activities? [see MD-715, II(E)]	No	GSA's mechanisms for compiling, monitoring, and analyzing data on recruitment activities need to be improved. See plan Part H.24.
<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	No	Applicant flow data for fewer than 20% of FY21 job announcements included mandatory statistics that identified which applicants were interviewed. See plan Part H.25.



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 <b>Compliance Indicator</b>  <b>Measures</b>	E.4 (CONTINUED) – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [see 29 CFR § 1614.203(d)(4)]	No	Reasonable accommodations data is insufficiently accurate and complete to calculate metrics required to answer measure C.2.b.5. The reasonable accommodation data system also lacks discretionary measures of effectiveness, such as metrics on how long it takes to provide approved accommodations. See plan Part H.26.
<b>E.4.a.6</b>	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	No	Anti-harassment program data was not available in FY20 or FY21 for analysis. See plan Part H.27.
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	GSA has mechanisms for re-surveying race, ethnicity, and disability status; however, those processes are not effective at ensuring accurate data collection. No mechanisms are in place to address race/ethnicity coding that is believed to be inaccurate, and no mechanisms are in place to ensure correct coding of accurate disability status information for Schedule A(u) hires during their respective probationary periods.

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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>E.5.a</b>	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	GSA assesses and monitors its performance using the 156 Part G compliance measures, which are linked to relevant EEO laws, regulations, EEOC Management Directives, Instructions, and guidance. Many measures (e.g., processing of complaints, processing of requests for reasonable accommodations, and training compliance) use empirical data which is tracked over time to assess status, trends, and progress.
<b>E.5.b</b>	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	During FY21, GSA made significant improvements in its Special Emphasis Program activities. Efforts centered on identifying agency and suborganization SEPs and affinity groups, revitalizing the agency-level PWD SEP, and establishing more formal governance and oversight mechanisms, including executive-level sponsorships of SEPs. Prior to undertaking those efforts, GSA reviewed practices and products from the National Aeronautics and Space Administration (NASA), the Department of the Navy, and other agencies.
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	







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<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b>			
This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.			
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	
<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	

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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR § 1614.502; MD-715, II(E)]	Yes	
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR § 1614.108(g)]	Yes	
<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR § 1614.501]	Yes	
<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR § 1614.403(e)]	Yes	
<b>F.2.a.4</b>	Pursuant to 29 CFR § 1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002) § 203(a)]	Yes	
<b>F.3.b</b>	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR § 1614.703(d)]	Yes	

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<b>PART H.1</b>						
Part G Measure:		A.2.b.1: Does the agency prominently post the following information throughout the workplace and on its public website: The business contact information for EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]?				
Brief Description of Program Deficiency:		All business contact information required under this measure is posted prominently on publicly accessible websites, except for information on GSA's Special Emphasis Program Managers.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
03/17/22	07/29/22	N/A	N/A	Publicly post contact information for Special Emphasis Programs.		
<b>Responsible Official(s)</b>						
Title			Name		Plan is in Performance Standards?	
Chief Human Capital Officer			Traci DiMartini		No	
<b>Planned Activities Toward Completion of Objective</b>						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
07/29/22	Publicly post contact information for Special Emphasis Programs			Yes	N/A	N/A
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PART H.2				
Part G Measure:	B.1.a.2: Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]			
Brief Description of Program Deficiency:	During FY21, the agency Organization Chart did not clearly define the reporting structure for the EEO Office. The head of the EEO Office reports directly to the GSA Administrator (agency head); however, the FY21 organizational chart showed the reporting relationship to be between the EEO Office and the Deputy Administrator.			
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
6/9/21	12/1/21	N/A	10/15/21	Update the agency organizational chart to show that the EEO Director reports directly to the Administrator (Agency Head)
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
EEO Director		Mary Gibert		Yes
Chief of Staff		Brett Prather		Yes
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
7/1/21	Convey EEOC MD-110 and MD-715 organizational chart requirements to the Office of the Administrator.	Yes	N/A	7/1/21
12/1/21	Update the organizational chart to show the EEO Director reporting relationship with the Agency Head.	Yes	N/A	10/15/21
Report of Accomplishments				
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2022	The GSA organizational chart was updated to show the correct reporting structure for the principal EEO official and posted to <a href="https://www.gsa.gov/about-us/gsa-organization">https://www.gsa.gov/about-us/gsa-organization</a> .			

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PART H.3						
Part G Measure:		B.3.b: Does the agency's current strategic plan reference EEO/diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.				
Brief Description of Program Deficiency:		The strategic plan references diversity, equity, inclusion, and accessibility (DEIA) principles for both external-facing efforts (e.g., service delivery, customer support, and improving vendor and supplier diversity) and internal-facing efforts (e.g., hiring and performance management), but does not reference EEO principles (e.g., non-discrimination) or shared DEIA/EEO objectives (such as affirmative actions to increase participation of persons with disabilities or identification and removal of barriers to equality of opportunity).				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
5/15/21	9/30/22	N/A	N/A	Incorporate EEO principles into the agency strategic plan.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Director, Human Capital Policy & Programs		Darlene Smith		No		
EEO Director		Aluanda Drain		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
6/30/22	The Associate Administrator of Civil Rights will discuss the lack of EEO principles in GSA's strategic plan with the Chief Financial Officer and Deputy Administrator. As an interim step, the Office of Civil Rights will develop and provide relevant EEO principles to OHRM for inclusion in the GSA DEIA Strategic Plan. (Responsible Official: Aluanda Drain)			Yes	N/A	N/A
9/30/22	Incorporate EEO principles into relevant sections of the next revision to the agency human resources or diversity, equity, inclusion, and accessibility (DEIA) strategic plan (Responsible Official: Darlene Smith)			Yes	N/A	N/A
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<b>PART H.4</b>				
Part G Measure:	B.4.a.1: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]			
Brief Description of Program Deficiency:	GSA does not currently have accurate and complete reasonable accommodation and anti-harassment data required to complete the FY 21 self-assessment measures C.2.a.5 or C.2.b.5. Staffing was identified in FY20 and FY21 as a contributing factor impacting both programs. Data on Schedule A(u) employee conversions assessed in Part J, Section V.A.1 (including narrative explanations for non-conversions) was not provided in FY20 or FY21.			
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/1/21	10/31/22	N/A	N/A	Provide sufficient funding and qualified staffing to generate timely, accurate, and complete anti-harassment, reasonable accommodations, and Schedule A(u) conversion data necessary to assess Part G compliance measures C.2.a.5 or C.2.b.5 and Part J.
<b>Responsible Official(s)</b>				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
<b>Planned Activities Toward Completion of Objective</b>				
Target Date	Planned Activity			Sufficient Funding / Staffing?
8/30/22	Identify all human resources data and information required to support assessment of Part G measures C.2.a.5 and C.2.b.5 and Part J, Section V.A.1.			Yes
10/31/22	Provide to the Office of Civil Rights complete and accurate data and information required to document conversions of eligible Schedule A(u) employees and reasons for non-conversions, if any.			Yes
10/31/22	Provide to the Office of Civil Rights complete and accurate data and information required to support assessment of Part G measures C.2.a.5 and C.2.b.5.			Yes
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<b>Plan to Attain Essential Elements</b>				
<b>PART H.5</b>				
Part G Measure:	B.4.a.2: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]			
Brief Description of Program Deficiency:	Relevant HR subject matter experts were not made available to support FY21 investigations of triggers identified and prioritized for barrier analysis in FY20.			
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>				
<b>Date Initiated</b>	<b>Target Date</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
3/17/22	11/7/22	N/A	N/A	Provide sufficient funding and qualified staffing to successfully conduct ongoing programs of barrier investigation.
<b>Responsible Official(s)</b>				
<b>Title</b>		<b>Name</b>		<b>Plan is in Performance Standards?</b>
Chief Human Capital Officer		Traci DiMartini		No
<b>Planned Activities Toward Completion of Objective</b>				
<b>Target Date</b>	<b>Planned Activity</b>			<b>Sufficient Funding / Staffing?</b>
11/8/21	Hire program manager to oversee Diversity, Equity, Inclusion, and Accessibility policies and programs.			Yes
6/3/22	Based on annual prioritized triggers, identify and allocate relevant subject matter experts (SMEs) to support ongoing investigations into potential barriers associated with triggers identified as part of the MD-715 process. Commit to meetings between the Affirmative Employment Program (AEPM) Manager, DEIA Program Manager, and relevant HR SMEs, no less frequently than bi-monthly, to track status and progress, share information about activities undertaken between meetings, develop plans for future efforts, and identify new areas of subject matter expertise required.			Yes
6/30/22	Conduct first meeting between the AEPM, DEIA Program Manager, and relevant HR SMEs on prioritized FY21 barrier analysis topics.			Yes
<b>Report of Accomplishments</b>				
<b>Fiscal Year</b>	<b>Accomplishments</b>			
2022	DEIA Program Manager was hired.			

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<b>PART H.6</b>		
Part G Measure:	B.4.a.7: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	
Brief Description of Program Deficiency:	<p>GSA currently has deficiencies in both employee and applicant data (but not in complaint data); however, the reasons for the shortfalls are not clear. Along with measures E.4.a.2 and E.4.a.4 (which address systems), measure B.4.a.7 seeks to ensure that agencies are able to collect, maintain, and analyze complete and accurate employee data and applicant flow data (measure C.4.c). This Part H plan seeks first to identify relevant requirements, understand the current deficiencies, and determine the underlying factors, prior to developing corrective plans targeting resolution. As such, it is possible that measures B.4.a.7, E.4.a.2, and/or E.4.a.4 are not all deficiencies (or that all of them are). To address the unknowns, this Part H plan will holistically account for both “sufficient funding and qualified staffing” under B.4.a.7 and “systems in place to accurately collect, monitor, and analyze”... “race, national origin, sex, and disability status of agency employees”...and “external and internal applicant flow data concerning the applicants’ race, national origin, sex, and disability status” under E.4.a.2 and E.4.a.4, as well as outcomes measured by C.4.c and associated procedures and other factors (unrelated to funding, staffing, and systems) that may also impact compliance of required outcomes. Specific identified data-related issues include:</p> <ol style="list-style-type: none"> <li>(1) Interview statistics are not captured within applicant flow data for all announcements</li> <li>(2) Collection of employee disability status information does not ensure accurate disability coding of Schedule A(u) hires</li> <li>(3) Workforce data management does not address inconsistencies between elements <i>within</i> the employee data system of record, including (a) disability status codes, (b) data from appointments through hiring authorities that take disability into account (including Schedule A(u) and others), and (c) veterans’ preference codes</li> <li>(4) Workforce data management does not address inconsistencies between (a) disability status codes within the system of record and (b) data from requests for reasonable accommodations (maintained outside the HR Links system of record)</li> <li>(5) Workforce data management does not address instances where employee race/ethnicity data is suspected of being incorrectly self-identified during initial onboarding or subsequent re-survey efforts</li> <li>(6) Agency-designated employee race/ethnicity data may not be entirely correct</li> </ol>	



Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
3/16/22	9/30/23	N/A	N/A	Attain and maintain required workforce and applicant data. Improve workforce and applicant data where required. Further implement discretionary improvements to employee data where practicable, in accordance with 29 CFR § 1614.203(d)(6)(ii) and consistent with applicable OPM regulations.	
Responsible Official(s)					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/23	Identify potential mechanisms, timeframes, and resource requirements (e.g., staffing, training, funding, data systems/software, procedures, etc.) necessary to address data-related corrections and/or improvements in each of the following areas (some issues may require engagement with OPM for guidance):		Yes	N/A	N/A
9/30/22	a. How GSA can capture statistics on interviewed applicants within agency applicant flow data, in accordance with EEOC MD-715 and the EEOC's Instructions to Federal Agencies for MD-715.		Yes	N/A	N/A
9/30/23	b. How GSA can capture and maintain accurate disability codes <u>within the HR Links system of record</u> for all <u>Schedule A(u)</u> employees.		Yes	N/A	N/A
9/30/23	c. How GSA can capture and maintain accurate disability codes <u>within the HR Links system of record</u> , based on information from appointments under hiring authorities that take disabilities into account (other than <u>Schedule A(u)</u> ).		Yes	N/A	N/A
9/30/23	d. How GSA can (or should) change disability status code information <u>within the HR Links system of record</u> , based on <u>information derived from data from requests for reasonable accommodations</u> .		Yes	N/A	N/A
9/30/22	e. How GSA can add <i>accurate</i> disability status codes (1) <u>derived from data from requests for reasonable accommodations</u> , (2) to the <u>reasonable accommodations data system</u> , (3) for all requestors of reasonable accommodations who have <i>inaccurate</i> disability status codes <u>within the HR Links system of record</u> .		Yes	N/A	N/A
9/30/23	f. Engage with OPM and EEOC to determine if veterans' preference codes (VPCs) may be used to classify employees as PWD (i.e., in addition to hiring authorities that take disability into account (including those that confer eligibility due to status as a disabled veteran) and/or data from requests for reasonable accommodations).		Yes	N/A	N/A

3/30/23	<p>g. Develop mechanisms to ensure agency engagement with employees (per 29 CFR § 1614.601(b)) to capture accurate race/ethnicity information:</p> <ul style="list-style-type: none"> <li>i. In situations where employees do not voluntarily provide race/ethnicity information</li> <li>ii. In situations where employees self-identify as <u>all</u> race/ethnicity options (i.e., Hispanic, White, Black or African American, Asian, Native Hawaiian or Other Pacific Islander, and American Indian or Alaska Native)</li> </ul>	Yes	N/A	N/A
9/30/23	<p>h. Identify mechanisms to add metadata elements to the system of record for race/national origin/ethnicity data and disability status data. Specifically, for each of those elements, it is desirable to add metadata fields that capture when the data was last updated, and whether the data was generated through employee self-identification or through designation by the agency.</p>	Yes	N/A	N/A
9/30/23	<p>i. Develop and execute plans to conduct annual resurvey efforts for both disability status information and race/ethnicity data. Expand communications to broaden response rates. Target specific groups for additional re-survey efforts (i.e., through focused email notifications and other specific efforts), as warranted by analysis of employee data, including, but not limited to:</p> <ul style="list-style-type: none"> <li>i. Veterans (more than 1,000 disabled veterans have not self-identified as having a disability within the HR Links system of record)</li> <li>ii. Hispanics (this demographic group falls short of expected participation rates, particularly in higher grade levels)</li> <li>iii. Individuals who have been federal employees for five or more years (statistics show a reverse correlation between length of employment and rates of self-identification as a person with disabilities)</li> </ul>	Yes	N/A	N/A
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PART H.7					
Part G Measure:		B.4.a.9: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]			
Brief Description of Program Deficiency:		<p>Along with measure E.4.a.6 (which addresses systems), measure B.4.a.9 seeks to ensure effective resourcing and management of anti-harassment programs, as demonstrated by (a) timely conducting inquiries into harassment allegations (measure C.2.a.5), (b) providing data to support the annual self-assessment (measure B.4.a.1), (c) providing data to support identification of triggers (measure D.1.b), and (d) providing data to support barrier analysis (measure D.2.b). In both FY20 and FY21, GSA was unable to assess the timeliness of harassment inquiries because harassment data was unavailable for analysis. Absent relevant data, GSA was also unable to complete the annual assessment or conduct effective trigger identification or barrier investigations. Staffing resources and system limitations were both cited in FY21 as contributing factors; however, the exact reasons for the shortfalls are not clear. Thus, this Part H plan seeks first to identify relevant requirements, understand the current deficiencies, and determine the underlying factors, prior to developing corrective plans targeting resolution. As such, it is possible that measure B.4.a.9 is not deficient. To address the unknowns, this Part H plan will holistically account for both “sufficient funding and qualified staffing” under B.4.a.9 and “effective and accurate systems in place to evaluate”... “the processing of complaints for the anti-harassment program” under E.4.a.6, as well as associated procedures and other factors (i.e., unrelated to funding, staffing, and systems) that may also impact compliance of required outcomes.</p>			
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
3/16/22	9/30/22	N/A	N/A	Attain and maintain accurate anti-harassment program data. Provide sufficient funding, qualified staffing, and effective, accurate systems to enable timely processing of inquiries (and other time-constrained milestones identified in the GSA anti-harassment procedures) and to provide accurate and complete data required to support annual assessments, trigger identification, and barrier analyses.	
Responsible Official(s)					
Title			Name		Plan is in Performance Standards?
Chief Human Capital Officer			Traci DiMartini		No

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/22	<p>Develop a comprehensive list of all allegations of harassment reported to GSA during FY20, FY21, and FY22, including, at a minimum, the data elements listed below.</p> <ol style="list-style-type: none"> <li>1. Unique identifier for each person allegedly harassed (Personally Identifiable Information (PII) sufficient to link the employee to their HR Links data, needed for more detailed trigger identification and barrier analysis) <u>OR</u> For each person allegedly harassed, the following data elements from the HR Links system of record:               <ol style="list-style-type: none"> <li>a. Race/ethnicity code (6-digit binary)</li> <li>b. Sex/gender</li> <li>c. Disability status code</li> <li>d. Veterans' preference code</li> <li>e. Appointment authority</li> <li>f. Supervisor race/ethnicity/sex</li> </ol> </li> <li>2. For each alleged harasser, either a PII identifier or the following data elements from the HR Links system of record:               <ol style="list-style-type: none"> <li>a. Race/ethnicity code (6-digit binary)</li> <li>b. Sex/gender</li> <li>c. Disability status code</li> <li>d. Veterans' preference code</li> <li>e. Appointment authority</li> </ol> </li> <li>3. Description of alleged behavior (e.g., threats, racial or ethnic jokes, bullying, slurs)</li> <li>4. Whether the alleged behavior involved:               <ol style="list-style-type: none"> <li>a. Alleged harasser's supervisor or supervisory chain</li> <li>b. Race</li> <li>c. Sex/gender</li> <li>d. Disability</li> <li>e. Bullying, intimidation, or threatening behavior</li> <li>f. Age</li> <li>g. Retaliation</li> </ol> </li> <li>5. Dates when the following milestone events occurred:               <ol style="list-style-type: none"> <li>a. Initial date that any GSA official (e.g., supervisor, manager, or local Anti-Harassment Coordinator (AHC)) was first informed or made aware of the harassing conduct</li> <li>b. Date preliminary inquiry was initiated</li> <li>c. Date preliminary inquiry was completed</li> <li>d. Date local AHC was notified (and name of AHC)</li> </ol> </li> </ol> <p>Provide the information for FY20 and FY21 by 9/30/2022. Provide one-year data for each future fiscal year MD-715 reporting cycle (including FY22) within one month of the end of the fiscal year (by October 31) to support annual assessment, trigger identification, and barrier analysis.</p>	Yes	N/A	N/A
9/30/22	Identify staffing, procedures, training, funding, systems, software and/or other resource deficiencies, if any, that prevent development and maintenance of the data described above.	Yes	N/A	N/A
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PART H.8					
Part G Measure:		<ul style="list-style-type: none"> <li>B.4.a.10: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]</li> </ul>			
Brief Description of Program Deficiency:		<p>Along with measure E.4.a.5 (which addresses systems), measure B.4.a.10 seeks to ensure effective resourcing and management of reasonable accommodation programs, as demonstrated by (a) timely processing of requests for reasonable accommodations (measure C.2.b.5), (b) providing data to support the annual self-assessment (measure B.4.a.1), (c) providing data to support identification of triggers (measure D.1.b), and (d) providing data to support barrier analysis (measure D.2.b). GSA untimely processed roughly 25% of requests. Additionally, program data was insufficiently complete and accurate to support the Part G compliance assessment, trigger identification, barrier analysis, or tracking of completion of Part H corrective plans. Staffing resources were identified in FY20 and FY21 as contributing factors and certain system limitations are known; however, the exact reasons for the ineffective outcomes are not clear. Thus, this Part H plan seeks first to identify relevant requirements, understand the current deficiencies, and determine the underlying factors, prior to developing corrective plans targeting resolution. To address the unknowns, this Part H plan will holistically account for both “sufficient funding and qualified staffing” under B.4.a.10 and “effective and accurate systems in place to evaluate”... “the processing of requests for reasonable accommodations” under E.4.a.5, as well as associated procedures and other factors (i.e., unrelated to funding, staffing, and systems) that may also impact compliance of required outcomes.</p>			
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
3/16/22	9/30/22	N/A	N/A	<p>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.</p>	
Responsible Official(s)					
Title			Name		Plan is in Performance Standards?
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 Activity</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>
9/30/22	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	N/A	N/A
9/30/22	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	N/A	N/A
9/30/23	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	N/A	N/A
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<b>PART H.9</b>						
Part G Measure:		<p>Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:</p> <ul style="list-style-type: none"> <li>• B.5.a.1: EEO Complaint Process? [see MD-715(II)(B)]</li> <li>• B.5.a.2: Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]</li> <li>• B.5.a.3: Anti-Harassment Policy? [see MD-715(II)(B)]</li> <li>• B.5.a.4: Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]</li> <li>• B.5.a.5: Alternative dispute resolution (ADR), with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]</li> </ul>				
Brief Description of Program Deficiency:		At the end of FY21, two of GSA's 1,739 supervisors/managers were overdue for a training course that covers their responsibilities in all five topic areas described above. Both supervisors subsequently completed the training course in FY22. Existing mechanisms that rely on notification of supervisors of pending non-compliance and overdue training are ineffective in ensuring compliance and preventing reportable deficiencies.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>		
4/21/21	9/30/21	12/29/21	12/29/21	Ensure all supervisors attain and maintain compliance with relevant training requirements		
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Plan is in Performance Standards?</b>		
Chief Human Capital Officer		Traci DiMartini		No		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activity</b>			<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>
9/30/21	Ensure all supervisors attain and maintain compliance with relevant training requirements			Yes	12/29/21	12/29/21
<b>Report of Accomplishments</b>						
<b>Fiscal Year</b>	<b>Accomplishments</b>					
2022	All supervisors and managers became compliant with training requirements					

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<b>PART H.10</b>						
Part G Measure:	<p>C.2.a.5:</p> <ul style="list-style-type: none"> <li>Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dept of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)]</li> <li>If "no", please provide the percentage of timely-processed inquiries in the comments column.</li> </ul>					
Brief Description of Program Deficiency:	GSA was unable to assess this measure or calculate the percentage of timely-processed inquiries because anti-harassment program data was unavailable. See plan Part H.7.					
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>		
3/16/22	9/30/22	N/A	N/A	Improve the anti-harassment program. Provide sufficient funding, qualified staffing, and effective, accurate systems to enable consistently timely processing of inquiries (and other time-constrained milestones identified in the GSA anti-harassment procedures) and to provide accurate and complete data required to support annual assessments (including calculation and reporting of the percentage of timely-processed inquiries), trigger identification, and barrier analyses.		
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Plan is in Performance Standards?</b>		
Chief Human Capital Officer		Traci DiMartini		No		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activity</b>			<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>
9/30/22	Resolution of this potential deficiency is addressed in Part H plan H.7			Yes	N/A	N/A
<b>Report of Accomplishments</b>						
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PART H.11				
Part G Measure:	C.2.b.5: <ul style="list-style-type: none"> <li>Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD- 715, II(C)]</li> <li>If "no", please provide the percentage of timely-processed requests in the comments column.</li> </ul>			
Brief Description of Program Deficiency:	GSA did not process reasonable accommodation requests within the timeframe set forth in its reasonable accommodation procedures. Program data was also incomplete and inaccurate, and therefore could not be used to calculate the percentage of timely-processed requests required by this measure, adversely affecting completion of the assessment. It also could not be used to support trigger identification, barrier analysis, or tracking progress of Part H corrective plans. See plan Part H.8.			
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
5/17/21	9/30/21	9/30/22	N/A	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.
Responsible Official(s)				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
Planned Activities Toward Completion of Objective				
Target Date	Planned Activity			Sufficient Funding / Staffing?
9/30/22	Resolution of this deficiency is addressed in Part H plan H.8			Yes
				Date Modified
				Date Completed
				N/A
				N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			

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<b>Plan to Attain Essential Elements</b>					
<b>PART H.12</b>					
Part G Measure:	C.4.c: Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]				
Brief Description of Program Deficiency:	Workforce demographic data is not fully accurate. Applicant flow data is incomplete. Career development data made significant progress in FY20 and FY21 but was insufficient in FY21 to complete the Part J data tables. See plan Part H.6.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
3/16/22	9/30/23	N/A	N/A	Attain and maintain required workforce and applicant data. Improve workforce and applicant data where required. Further improve employee data where practicable, in accordance with 29 CFR § 1614.203(d)(6)(ii) and consistent with applicable OPM regulations.	
<b>Responsible Official(s)</b>					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
<b>Planned Activities Toward Completion of Objective</b>					
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/22	Resolution of this deficiency is addressed in plan Part H.6		Yes	N/A	N/A
<b>Report of Accomplishments</b>					
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PART H.13						
Part G Measure:		C.4.d: Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]				
Brief Description of Program Deficiency:		Complete and accurate data was not timely provided in FY21 on (a) exit interviews, (b) grievances, (c) allegations of harassment, or (d) requests for reasonable accommodations.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
4/7/22	9/30/22	N/A	N/A	Develop mechanisms to ensure timely, complete, and accurate data from "other sources" (i.e., other than workforce, applicant, and career development data) to support MD-715 requirements. This Part H plan focuses on resolution of deficiencies associated with grievance data only. Exit survey shortfalls are addressed by plan Part H.19. Deficiencies associated with reasonable accommodations are addressed by plan Part H.8. Deficiencies associated with anti-harassment are addressed by plan Part H.7. No grievance data was provided for FY20. Grievance data for FY21 was provided in April 2022 and lacked data elements necessary to support trigger identification and barrier analysis.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
EEO Director		Aluanda Drain		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/22	Grievance program manager and AEPM will collaborate to identify data shortfalls associated with grievance data. Grievance program manager will update the grievance data system to capture required data.			Yes	N/A	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					

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<b>Plan to Attain Essential Elements</b>						
<b>PART H.14</b>						
Part G Measure:	C.4.e.1: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to: Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]					
Brief Description of Program Deficiency:	In FY21, the HR office and EEO office did not collaborate on implementation of the Affirmative Action Plan or development or execution of PWD/PWTD or other outreach/recruitment initiatives. Plan Part H.16 addresses HR and EEO collaboration on trigger identification and barrier analysis.					
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/12/22	7/29/22	N/A	N/A	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 (DVAAP)).		
<b>Responsible Official(s)</b>						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
EEO Director		Aluanda Drain		Yes		
<b>Planned Activities Toward Completion of Objective</b>						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
6/30/22	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. See examples on the next page.			Yes	N/A	N/A

	<p>For example:</p> <ul style="list-style-type: none"> <li>• The recruitment focus area group should address specific steps the agency can take to ensure qualified PWD are aware of and encouraged to apply for GSA job vacancies, as well as AAP questions related to recruitment.</li> <li>• The hiring focus area should include training of hiring managers on use of hiring authorities that take disability into account (including Schedule A(u), Veterans Recruitment Authority (VRA), Veterans Employment Opportunity Act (VEOA) authority, 30% or More Disabled Veteran authority); mechanisms for improving use of those authorities; and AAP questions related to hiring.</li> <li>• The advancement focus area should include procedures for encouraging participation of PWD/PWTD in career development programs, tracking/management of probationary Schedule A(u) employees, tracking of PWD/PWTD applications and participation in advancement-related programs described in Section IV of Part J (including Individual Development Plans), as well as AAP questions/tables related to advancement.</li> <li>• The retention focus area group should address proactive management of Schedule A(u) hires throughout their probationary periods, conversion of Schedule A(u) employees, improving the exit survey to add required questions regarding PWD, potential improvements to the accuracy of disability status codes, and enhanced tracking and reporting of PWD/PWTD participation rates and their trends throughout the employment life cycle, as well as AAP questions/tables related to retention.</li> </ul>			
6/30/22	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	N/A	N/A
7/29/22	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	N/A	N/A
<b>Report of Accomplishments</b>				
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<b>Plan to Attain Essential Elements</b>					
<b>PART H.15</b>					
Part G Measure:	C.4.e.2: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to develop and/or conduct outreach and recruiting initiatives? [see MD- 715, II(C)]				
Brief Description of Program Deficiency:	In FY21, the HR office and EEO office did not collaborate on outreach/recruitment.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
1/12/22	6/30/22	N/A	N/A	Develop and implement regular collaborative meetings and objectives relating to recruitment under the Affirmative Action Plan for Persons with Disabilities and collaborative meetings to coordinate efforts of the Federal Equal Opportunity Recruitment Program, Selective Placement Program, and Disabled Veterans Affirmative Action Program.	
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Plan is in Performance Standards?</b>	
Chief Human Capital Officer		Traci DiMartini		No	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activity</b>		<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>
6/30/22	This deficiency is addressed under plan Part H.14		Yes	N/A	N/A
<b>Report of Accomplishments</b>					
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PART H.16						
Part G Measure:		C.4.e.4: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]				
Brief Description of Program Deficiency:		In FY21, the HR office and the EEO office did not collaborate on barrier analysis.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/12/22	6/30/22	N/A	N/A	Develop and implement regular collaborative meetings between relevant HR SMEs and the AEPM to enable systematic, ongoing progress to be made toward identifying triggers and investigating those triggers to identify and eliminate EEO barriers to equal employment opportunity.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
6/30/22	Identify relevant HR subject matter experts (SMEs) for each prioritized trigger identified during the previous annual MD-715 reporting cycle and subsequent mid-year analyses. Establish regular meetings between the HR SMEs, relevant SEPMs, the DEIA PM, and the AEPM, no less than bi-monthly for each barrier topic, to generate and execute barrier analysis plans, discuss findings, and track and document progress attained between meetings. As barrier investigations begin to conclude within a particular trigger area, identify relevant HR SMEs associated with the next highest barrier analysis priority, and adjust HR SMEs (and SEPM composition) accordingly, to ensure effective, ongoing barrier analyses.			Yes	N/A	N/A
Report of Accomplishments						
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<b>Plan to Attain Essential Elements</b>				
<b>PART H.17</b>				
Part G Measure:		C.4.e.5: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to assist in preparing the MD-715 report? [see MD-715, II(C)]		
Brief Description of Program Deficiency:		HR office and EEO office collaboration on Part G, Part H, Part I, and Part J was insufficient in FY20 and FY21 to fulfill agency MD-715 reporting obligations associated with those sections.		
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>				
<b>Date Initiated</b>	<b>Target Date</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
4/12/22	10/31/22	N/A	N/A	Achieve and maintain HR office and EEO office collaboration in all aspects of the MD-715 reporting process, including providing information and data to develop Parts A thru J and the MD-715 data tables.
<b>Responsible Official(s)</b>				
<b>Title</b>		<b>Name</b>		<b>Plan is in Performance Standards?</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 Activity</b>			<b>Sufficient Funding / Staffing?</b>
6/30/22	Generate a comprehensive list of all HR-related inputs required to comply with annual MD-715 reporting requirements, including both standard annual obligations, as well as unique deliverables associated with current Part H, Part I, and Part J focus areas. Provide that list to the CHCO. Aside from that comprehensive list (as well as data/information requests stemming from (a) annual compliance assessments, (b) ongoing barrier analysis activities, and (c) regular HR/EEO collaboration meetings), coordinate off-cycle/ad hoc data requests through designated HR points of contact. (Responsible Official: EEO Director)			Yes
10/31/22	Address individual FY21 deficiencies identified within this MD-715 Part H independently, in accordance with their respective target dates. Separately, use the list provided by the EEO Director (above) to develop, compile, and provide all HR-related inputs to the MD-715 report to the AEPM by October 31 each year (i.e., within one month of the end of the fiscal year). (Responsible Official: CHCO)			Yes
<b>Report of Accomplishments</b>				
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<b>Plan to Attain Essential Elements</b>						
<b>PART H.18</b>						
Part G Measure:		D.1.b: Does the agency regularly use the following sources of information for trigger identification: workforce data, complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union/program evaluations, special emphasis programs, reasonable accommodation program data, anti-harassment program data, and/or information from external special interest groups? [see MD-715 Instructions, Sec. I]				
Brief Description of Program Deficiency:		Key referenced sources of information were insufficient or provided too late to support trigger identification. Exit survey data was incomplete and untimely, harassment data was unavailable, and reasonable accommodation data was inaccurate and incomplete. Grievance data was also incomplete. Workforce data had inaccurate disability status and race/ethnicity information. No information showing why GSA has not converted Schedule A(u) employees was available.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/15/22	10/30/22	N/A	N/A	Obtain timely, complete, and accurate information to support annual efforts to identify triggers		
<b>Responsible Official(s)</b>						
Title			Name		Plan is in Performance Standards?	
Chief Human Capital Officer			Traci DiMartini		No	
<b>Planned Activities Toward Completion of Objective</b>						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
10/30/22	Resolution of this deficiency is addressed in other Part H corrective plans targeting individual deficiencies relating to each of the various other sources of information (e.g., plan Part H.6 addresses workforce data, plan Part H.7 addresses harassment data, plan Part H.8 addresses reasonable accommodations data, and plan Part H.19 addresses exit survey data), as well as in overarching Part H plans that comprehensively address MD-715 reporting requirements (e.g., plan Part H.17)			Yes	N/A	N/A
<b>Report of Accomplishments</b>						
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PART H.19						
Part G Measure:	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)]					
Brief Description of Program Deficiency:	GSA does not conduct surveys that contain questions on how the agency could improve, hiring, inclusion, retention, and advance of individuals with disabilities.					
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
10/1/18	7/1/19	9/30/23	N/A	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		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
7/1/19	Develop exit survey questions that address all requirements in EEOC's revised Part G assessment checklist.			Yes	9/30/21	5/24/21
9/30/21	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.			Yes	9/30/23	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					
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.					

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<b>Plan to Attain Essential Elements</b>						
<b>PART H.20</b>						
Part G Measure:		D.2.d: Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program data, special emphasis program data, reasonable accommodation program data, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.				
Brief Description of Program Deficiency:		Key referenced sources of information were insufficient or provided too late to support barrier investigations.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/15/22	10/30/22	N/A	N/A	Obtain timely, complete, and accurate information to support ongoing efforts to investigate, identify, and eliminate barriers		
<b>Responsible Official(s)</b>						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
<b>Planned Activities Toward Completion of Objective</b>						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
10/30/22	Resolution of this deficiency is addressed through other Part H corrective plans that independently target resolution of individual deficiencies relating to each of the various sources of information (e.g., plan Part H.7 addresses harassment data, plan Part H.8 addresses reasonable accommodations data, and plan Part H.19 addresses exit survey data). In addition, plan Part H.16 addresses collaboration between HR and EEO offices to identify and remove barriers and plan Part H.17 addresses comprehensive data requirements to support MD-715 reporting requirements.			Yes	N/A	N/A
<b>Report of Accomplishments</b>						
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<b>Plan to Attain Essential Elements</b>						
<b>PART H.21</b>						
Part G Measure:		D.4.b: Does the agency take specific steps to ensure qualified Persons with Disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]				
Brief Description of Program Deficiency:		GSA did not conduct outreach or recruitment activities in FY21 focused on recruitment and hiring of PWD or PWTD.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
1/12/22	7/29/22	N/A	N/A	Take specific steps to ensure qualified PWD/PWTD are aware of and are encouraged to apply for job vacancies.		
<b>Responsible Official(s)</b>						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
<b>Planned Activities Toward Completion of Objective</b>						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
7/29/22	Resolution of this deficiency is addressed in plan Part H.14			Yes	N/A	N/A
<b>Report of Accomplishments</b>						
Fiscal Year	Accomplishments					

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General Services Administration			For period covering October 1, 2020 to September 30, 2021		
Plan to Attain Essential Elements					
PART H.22					
Part G Measure:		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)]			
Brief Description of Program Deficiency:		GSA has not set agency-specific participation goals for PWD or PWTD and did not undertake efforts in FY21 focused on raising participation rates of PWD or PWTD.			
Objective(s) and Dates for EEO Plan to Attain Essential Elements					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
1/12/22	7/29/22	N/A	N/A	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).	
Responsible Official(s)					
Title			Name		Plan is in Performance Standards?
Chief Human Capital Officer			Traci DiMartini		No
Planned Activities Toward Completion of Objective					
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified
7/29/22	Resolution of this deficiency is addressed in plan Part H.14			Yes	N/A
Report of Accomplishments					
Fiscal Year	Accomplishments				
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%.				
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).				

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General Services Administration		For period covering October 1, 2020 to September 30, 2021		
<b>Plan to Attain Essential Elements</b>				
<b>PART H.23</b>				
Part G Measure:		E.4.a.2: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]		
Brief Description of Program Deficiency:		<p>Data on race/ethnicity and disability status is not accurately collected or monitored. Data is primarily self-identified by employees; however, inaccurate employee race/ethnicity and disability status inputs are not consistently addressed. When inputs are not voluntarily provided by employees, data is generated by the agency; however, some employee data (which might have been self-identified and/or agency-designated) is inconsistent with regulations and OPM guidance. There is currently no way to identify whether race/ethnicity or disability data was generated by an employee or the agency (or when data entries were entered or last modified).</p> <p>Agency coding of disability status does not incorporate data from reasonable accommodation requests or appointments under special hiring authorities for individuals with disabilities. The employee data system (HR Links) does not address inconsistencies between data elements (e.g., disability status codes (employee or agency-generated), data from appointments under hiring authorities that take disabilities into account, and veterans' preference codes), or external data from requests for reasonable accommodations.</p>		
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
3/16/22	9/30/23	N/A	N/A	Attain and maintain required employee data. Improve collection and monitoring of workforce data as required. Further improve employee data where practicable, in accordance with 29 CFR § 1614.203(d)(6)(ii) and consistent with applicable OPM regulations.
<b>Responsible Official(s)</b>				
Title		Name		Plan is in Performance Standards?
Chief Human Capital Officer		Traci DiMartini		No
<b>Planned Activities Toward Completion of Objective</b>				
Target Date	Planned Activity			Sufficient Funding / Staffing?
N/A	Resolution of this deficiency is addressed in plan Part H.6			Yes
				Date Modified
				Date Completed
				N/A
				N/A
<b>Report of Accomplishments</b>				
Fiscal Year	Accomplishments			

<b>EEOC FORM 715-02 PART H</b>		<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>		
<b>General Services Administration</b>		<b>For period covering October 1, 2020 to September 30, 2021</b>		
<b>Plan to Attain Essential Elements</b>				
<b>PART H.24</b>				
Part G Measure:		E.4.a.3: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: Recruitment activities? [see MD-715, II(E)]		
Brief Description of Program Deficiency:		GSA has no data collection system to facilitate compiling, monitoring, or analyzing data on recruiting activities.		
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>				
<b>Date Initiated</b>	<b>Target Date</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
4/18/22	9/30/23	N/A	N/A	Develop, implement, and maintain a tracking system for recruitment activities to permit analyses of these efforts to support examination of potential barriers to equality of opportunity
<b>Responsible Official(s)</b>				
<b>Title</b>		<b>Name</b>		<b>Plan is in Performance Standards?</b>
Chief Human Capital Officer		Traci DiMartini		No
<b>Planned Activities Toward Completion of Objective</b>				
<b>Target Date</b>	<b>Planned Activity</b>			<b>Sufficient Funding / Staffing?</b>
8/31/22	Hold collaborative meeting(s) between GSA National Recruitment Center, AEPM, DEIA PM, and SEPMs for the PWD SEP, Hispanic Employment Program, and Federal Women's Program to identify relevant recruitment-related data elements necessary to support barrier analysis, effective recruitment program oversight, and requirements of the AAP, SPP, FEORP, and DVAAP.			Yes
2/15/23	Identify recruitment system requirements, access protocols, etc.			Yes
9/30/24	Develop and implement automated recruitment-specific data/tracking solution.			TBD
<b>Report of Accomplishments</b>				
<b>Fiscal Year</b>	<b>Accomplishments</b>			

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General Services Administration			For period covering October 1, 2020 to September 30, 2021			
Plan to Attain Essential Elements						
PART H.25						
Part G Measure:		E.4.a.4: External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]				
Brief Description of Program Deficiency:		Applicant flow data for fewer than 20% of FY21 job announcements included mandatory statistics that identified which applicants were interviewed, in addition to required data that identified which applicants were qualified, referred, and/or selected.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
3/16/22	9/30/23	N/A	N/A	Develop, implement, and maintain an accurate data collection system that includes all mandatory applicant flow data, including interview statistics.		
Responsible Official(s)						
Title		Name		Plan is in Performance Standards?		
Chief Human Capital Officer		Traci DiMartini		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activity			Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/23	This deficiency is addressed in plan Part H-6			Yes	N/A	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					



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General Services Administration		For period covering October 1, 2020 to September 30, 2021			
<b>Plan to Attain Essential Elements</b>					
<b>PART H.26</b>					
Part G Measure:	E.4.a.5: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: The processing of requests for reasonable accommodation? [see 29 CFR § 1614.203(d)(4)]				
Brief Description of Program Deficiency:	Reasonable accommodations data is insufficiently accurate and complete to calculate metrics required by measure C.2.b.5. Data is missing and includes milestone dates that are out of sequence, preventing accurate calculation of compliance metrics and effective monitoring and oversight of processing timeliness. The reasonable accommodation data system also lacks relevant discretionary measures of effectiveness, such as metrics on how long it takes to provide accommodations, once requests are approved.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>					
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description	
3/16/22	9/30/22	N/A	N/A	Improve the reasonable accommodations data system.	
<b>Responsible Official(s)</b>					
Title		Name		Plan is in Performance Standards?	
Chief Human Capital Officer		Traci DiMartini		No	
<b>Planned Activities Toward Completion of Objective</b>					
Target Date	Planned Activity		Sufficient Funding / Staffing?	Date Modified	Date Completed
9/30/22	Resolution of this deficiency is addressed in plan Part H.8		Yes	N/A	N/A
<b>Report of Accomplishments</b>					
Fiscal Year	Accomplishments				

EEOC FORM 715-02 PART H		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
General Services Administration		For period covering October 1, 2020 to September 30, 2021			
<b>Plan to Attain Essential Elements</b>					
<b>PART H.27</b>					
Part G Measure:	E.4.a.6: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]				
Brief Description of Program Deficiency:	Anti-harassment program data was not available in FY20 or FY21 for analysis.				
<b>Objective(s) and Dates for EEO Plan to Attain Essential Elements</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
3/16/22	9/30/22	N/A	N/A	Improve the anti-harassment program.	
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Plan is in Performance Standards?</b>	
Chief Human Capital Officer		Traci DiMartini		No	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activity</b>		<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>
9/30/22	Resolution of this deficiency is addressed in plan Part H.7		Yes	N/A	N/A
<b>Report of Accomplishments</b>					
<b>Fiscal Year</b>	<b>Accomplishments</b>				

## Part I – EEO Plans to Eliminate Identified Barriers

EEOC FORM 715-02 PART I		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
General Services Administration			For period covering October 1, 2020 to September 30, 2021		
<b>PART I.1</b>					
<b>Plan to Eliminate Identified Barriers (Race/Ethnicity/Sex – See Part J for Barriers for PWD/PWTD)</b>					
<b>Source of the Trigger:</b>		MD-715 data tables			
<b>Specific Workforce Data Table:</b>		Table A-4			
<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?		Hispanic Males and Hispanic Females both exhibit lower than expected participation in General Schedule (GS) grade levels GS-12 and higher			
<i>BARRIER GROUPS:</i>		Hispanic Males and Hispanic Females			
<b>Analysis Completed?</b>		No			
<b>Barrier(s) Identified?</b>		No			
<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>	
		None identified.		No barrier has yet been identified.	
<b>Objective(s) and Dates for EEO Plan to Eliminate Identified Barrier</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>
N/A	N/A	N/A	N/A	N/A	No barrier has yet been identified.
<b>Responsible Official(s)</b>					
<b>Title</b>			<b>Name</b>		<b>Plan is in Performance Standards?</b>
N/A			N/A		N/A
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activity</b>			<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b> <b>Date Completed</b>
N/A	N/A			N/A	N/A      N/A
<b>Report of Accomplishments</b>					
<b>Fiscal Year</b>	<b>Accomplishments</b>				
	See Part E Workforce Analysis for descriptions of investigative activities undertaken as part of FY21 barrier analysis efforts.				

**PART I.1 - Continued**

**Barrier Analysis Process**

Sources of Data	Source Reviewed?	Information Collected
Workforce Data Tables	Yes	Employee and applicant data throughout the employment lifecycle, for FY17, FY18, FY19, FY20, and FY21
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY18, FY19, FY20, and FY21.
Grievance Data	No	Grievance data was not available to support analyses.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	No	Anti-harassment data was not available to support FY21 analyses.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA Federal Employee Viewpoint Survey (FEVS) results from 2015, 2016, 2017, 2018, 2019, and 2020.
Exit Interview Data	No	Exit interview was not available to support FY21 analyses.
Focus Groups	Yes	Preliminary information about staffing procedures within GSA's two largest subcomponents (Public Building Service and Federal Acquisition Service)
Interviews	Yes	Information about workforce trends and demographic focus areas relevant to multiple individual GSA regions/offices/programs.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Issues identified by EEOC during FY17, FY18, and FY20 relating to Technical Assistance visits and reviews of GSA's EEO program. OMB and OPM data classification standards, for information on considerations for assessing additional race/ethnicity categories and/or non-binary options for sex/gender to support barrier analysis.
Other - Career Development Program Data	Yes	Data for six Competitive Development Programs (CDPs) in FY19, seven CDPs in FY20, and eleven CDPs in FY21.
Other - Special Emphasis Program (SEP) Information	Yes	Meetings with Hispanic Employment Program Special Emphasis Program Manager and affinity groups to identify triggers and areas of interest for barrier investigations.

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General Services Administration			For period covering October 1, 2020 to September 30, 2021			
<b>PART I.2</b>						
<b>Plan to Eliminate Identified Barriers (Race/Ethnicity/Sex – See Part J for Barriers for PWD/PWTD)</b>						
<b>Source of the Trigger:</b>		MD-715 data tables and career development data				
<b>Specific Workforce Data Table:</b>		Table A-7				
<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?		Hispanic Males and Asian Males received nominations and/or applied for all Competitive Development Programs (CDPs) in FY21 at rates below their respective participation rates in relevant feeder pools. Hispanic Females and White Females received nominations and/or applied for executive/SES-level CDPs below their respective participation rates in relevant feeder pools				
<b>BARRIER GROUPS:</b>		Hispanic Males and Hispanic Females, White Females, and Asian Males				
<b>Analysis Completed?</b>		No				
<b>Barrier(s) Identified?</b>		No				
<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>		
		None identified.		No barrier has yet been identified.		
<b>Objective(s) and Dates for EEO Plan to Eliminate Identified Barrier</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>	
N/A	N/A	N/A	N/A	N/A	No barrier has yet been identified.	
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Plan is in Performance Standards?</b>		
N/A		N/A		N/A		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activity</b>			<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>
N/A	N/A			N/A	N/A	N/A
<b>Report of Accomplishments</b>						
<b>Fiscal Year</b>	<b>Accomplishments</b>					
	See Part E Workforce Analysis for descriptions of investigative activities undertaken as part of FY21 barrier analysis efforts.					

**PART I.2 - Continued**

**Barrier Analysis Process**

Sources of Data	Source Reviewed?	Information Collected
Workforce Data Tables	Yes	Employee and applicant data throughout the employment lifecycle, for FY17, FY18, FY19, FY20, and FY21
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY18, FY19, FY20, and FY21.
Grievance Data	No	Grievance data was not available at the time that analyses were being conducted.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	No	Anti-harassment data was not available at the time that analyses were being conducted.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA Federal Employee Viewpoint Survey (FEVS) results from 2015, 2016, 2017, 2018, 2019, and 2020.
Exit Interview Data	No	Exit interview data was not available at the time that analyses were being conducted.
Focus Groups	Yes	Preliminary information about career development procedures within various GSA subcomponents.
Interviews	Yes	Information about nomination/application/selection procedures and communications regarding availability of CDPs and encouraging participation in CDPs.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Issues identified by EEOC during FY17, FY18, and FY20 relating to Technical Assistance visits and reviews of GSA's EEO program. OMB and OPM data classification standards, for information on considerations for assessing additional race/ethnicity categories and/or non-binary options for sex/gender to support barrier analysis.
Other - Career Development Program Data	Yes	Data for six Competitive Development Programs (CDPs) in FY19, seven CDPs in FY20, and eleven CDPs in FY21.
Other - Special Emphasis Program (SEP) Information	Yes	Meetings with Special Emphasis Programs and affinity groups to identify triggers and areas of interest for barrier investigations.

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General Services Administration			For period covering October 1, 2020 to September 30, 2021			
<b>PART I.3</b>						
<b>Plan to Eliminate Identified Barriers (Race/Ethnicity/Sex – See Part J for Barriers for PWD/PWTD)</b>						
Source of the Trigger:			MD-715 data tables			
Specific Workforce Data Table:			Table A-4			
<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?			Hispanic Males and Hispanic Females have much lower-than-expected participation among SES and Other Senior Pay positions.			
<i>BARRIER GROUPS:</i>			Hispanic or Latino Males Hispanic or Latino Females			
Analysis Completed?			No			
Barrier(s) Identified?			No			
<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>		
			None identified.	No barrier has yet been identified.		
<b>Objective(s) and Dates for EEO Plan to Eliminate Identified Barrier</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>	
N/A	N/A	N/A	N/A	N/A	No barrier has yet been identified.	
<b>Responsible Official(s)</b>						
<b>Title</b>			<b>Name</b>		<b>Plan is in Performance Standards?</b>	
N/A			N/A		N/A	
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activity</b>			<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	
N/A	N/A			N/A	N/A	
<b>Report of Accomplishments</b>						
<b>Fiscal Year</b>	<b>Accomplishments</b>					
	See Part E Workforce Analysis for descriptions of investigative activities undertaken as part of FY21 barrier analysis efforts.					

**PART I.3 - Continued**

**Barrier Analysis Process**

Sources of Data	Source Reviewed?	Information Collected
Workforce Data Tables	Yes	Employee and applicant data throughout the employment lifecycle, for FY17, FY18, FY19, FY20, and FY21
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY18, FY19, FY20, and FY21.
Grievance Data	No	Grievance data was not available to support analyses.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	No	Anti-harassment data was not available to support FY21 analyses.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA Federal Employee Viewpoint Survey (FEVS) results from 2015, 2016, 2017, 2018, 2019, and 2020.
Exit Interview Data	No	Exit interview was not available to support FY21 analyses.
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other - Career Development Program Data	Yes	Data for six Competitive Development Programs (CDPs) in FY19, seven CDPs in FY20, and eleven CDPs in FY21.
Other - Special Emphasis Program (SEP) Information	No	



## MD-715 – Part J

### Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

#### Section I: Efforts to Reach Regulatory Goals

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

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

- |                                |     |                                     |
|--------------------------------|-----|-------------------------------------|
| a. Cluster GS-1 to GS-10 (PWD) | Yes | <input checked="" type="radio"/> No |
| b. Cluster GS-11 to SES (PWD)  | Yes | <input checked="" type="radio"/> No |

Answer: GSA is fully compliant in this measure.

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

- |                                 |     |                                     |
|---------------------------------|-----|-------------------------------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes | <input checked="" type="radio"/> No |
| c. Cluster GS-11 to SES (PWTD)  | Yes | <input checked="" type="radio"/> No |

Answer: GSA is fully compliant in this measure.

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

Answer: 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 PWT. 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.

Yes

No

Answer: 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.

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

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

Yes      No

Answer: 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.

Yes

No

Answer: 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: Plan to Recruit and Hire Individuals with Disabilities

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

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

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

Answer: 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.

Answer: 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(u)), 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.

Answer: 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.

Yes       No      N/A

Answer: 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.

Answer: 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)      Yes       No
- b. New Hires for Permanent Workforce (PWTD)      Yes       No

Answer: No triggers exist in this measurement area.

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

a. New Hires for MCO (PWD)  Yes  No

Answer: 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.

b. New Hires for MCO (PWTD)  Yes  No

Answer: 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.

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

a. Qualified Applicants for MCO (PWD)  Yes  No

Answer: 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).

b. Qualified Applicants for MCO (PWTD)  Yes  No

Answer: 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.

a. Promotions for MCO (PWD)  Yes  No

Answer: 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).

b. Promotions for MCO (PWTD)  Yes  No

Answer: 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 IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

### **A. ADVANCEMENT PROGRAM PLAN**

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

Answer: 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, those eleven programs are 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 plan Part H.14 and other Part H corrective plans.

## **B. CAREER DEVELOPMENT OPPORTUNITIES**

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

Answer: 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



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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

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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 (#)
Other Career Development Programs	169	87	19	9	6	5
Training Programs	0	0	0	0	0	0
Internship Programs	553	23	41	2	25	2
Fellowship Programs	160	23	11	2	5	1
Mentoring Programs	Mentoring program is not centrally managed. No data available.					
Coaching Programs	Coaching does not require competition or supervisor approval.					
Detail Programs	Detail programs are not centrally managed. No data available.					

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.

a. Applicants (PWD)

Yes      No

b. Selections (PWD)

Yes      No

Answer: 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).

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4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- |                      |                                      |                          |
|----------------------|--------------------------------------|--------------------------|
| a. Applicants (PWTB) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| b. Selections (PWTB) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Answer: 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)  | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| b. Awards, Bonuses, & Incentives (PWTD) | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Answer: 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.

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)  | <input checked="" type="radio"/> Yes | <input type="radio"/> No            |
| b. Pay Increases (PWTD) | <input type="radio"/> Yes            | <input checked="" type="radio"/> No |

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Answer: 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.

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

- |                                      |     |    |                                      |
|--------------------------------------|-----|----|--------------------------------------|
| a. Other Types of Recognition (PWD)  | Yes | No | <input checked="" type="radio"/> N/A |
| b. Other Types of Recognition (PWTB) | Yes | No | <input checked="" type="radio"/> N/A |

Answer: 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.

- |  |                                      |  |                                     |
|--|--------------------------------------|--|-------------------------------------|
| a. SES                                 |                                      |  |                                     |
| i. Qualified Internal Applicants (PWD) | Yes                                  |  | <input checked="" type="radio"/> No |
| ii. Internal Selections (PWD)          | Yes                                  |  | <input checked="" type="radio"/> No |
| b. GS-15                               |                                      |  |                                     |
| i. Qualified Internal Applicants (PWD) | Yes                                  |  | <input checked="" type="radio"/> No |
| ii. Internal Selections (PWD)          | <input checked="" type="radio"/> Yes |  | No                                  |
| c. GS-14                               |                                      |  |                                     |
| i. Qualified Internal Applicants (PWD) | Yes                                  |  | <input checked="" type="radio"/> No |
| ii. Internal Selections (PWD)          | Yes                                  |  | <input checked="" type="radio"/> No |
| d. GS-13                               |                                      |  |                                     |
| i. Qualified Internal Applicants (PWD) | Yes                                  |  | <input checked="" type="radio"/> No |
| ii. Internal Selections (PWD)          | <input checked="" type="radio"/> Yes |  | No                                  |

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Answer: 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.

- |   |                                      |                          |
|---|--------------------------------------|--------------------------|
| a. SES                                  |                                      |                          |
| i. Qualified Internal Applicants (PWTD) | Yes                                  | <input type="radio"/> No |
| ii. Internal Selections (PWTD)          | Yes                                  | <input type="radio"/> No |
| b. GS-15                                |                                      |                          |
| i. Qualified Internal Applicants (PWTD) | Yes                                  | <input type="radio"/> No |
| ii. Internal Selections (PWTD)          | <input checked="" type="radio"/> Yes | No                       |
| c. GS-14                                |                                      |                          |
| i. Qualified Internal Applicants (PWTD) | Yes                                  | <input type="radio"/> No |
| ii. Internal Selections (PWTD)          | <input checked="" type="radio"/> Yes | No                       |
| d. GS-13                                |                                      |                          |
| i. Qualified Internal Applicants (PWTD) | Yes                                  | <input type="radio"/> No |
| ii. Internal Selections (PWTD)          | Yes                                  | <input type="radio"/> No |

Answer: 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.

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

- |                             |                                      |                                     |
|-----------------------------|--------------------------------------|-------------------------------------|
| a. New Hires to SES (PWD)   | Yes                                  | <input checked="" type="radio"/> No |
| b. New Hires to GS-15 (PWD) | <input checked="" type="radio"/> Yes | No                                  |
| c. New Hires to GS-14 (PWD) | Yes                                  | <input checked="" type="radio"/> No |
| d. New Hires to GS-13 (PWD) | Yes                                  | <input checked="" type="radio"/> No |

Answer: 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.

- |                              |                                      |                                     |
|------------------------------|--------------------------------------|-------------------------------------|
| a. New Hires to SES (PWTD)   | Yes                                  | <input checked="" type="radio"/> No |
| b. New Hires to GS-15 (PWTD) | <input checked="" type="radio"/> Yes | No                                  |
| c. New Hires to GS-14 (PWTD) | Yes                                  | <input checked="" type="radio"/> No |
| d. New Hires to GS-13 (PWTD) | Yes                                  | <input checked="" type="radio"/> No |

Answer: 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.

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

Answer: 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)                      Yes       No
  - ii. Internal Selections (PWTD)                                       Yes      No

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

Answer: 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

- a. New Hires to Executives (PWD)                                       Yes      No
- b. New Hires to Managers (PWD)                                       Yes      No
- c. New Hires to Supervisors (PWD)                                       Yes      No

Answer: 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 PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box

- a. New Hires to Executives (PWTD)                                       Yes      No
- b. New Hires to Managers (PWTD)                                       Yes      No
- c. New Hires to Supervisors (PWTD)                                       Yes      No



Answer: 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 V: Plan to Improve Retention of Persons with Disabilities

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Yes  No

Answer: 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)	<input checked="" type="radio"/> Yes	<input type="radio"/> No
b. Involuntary Separations (PWD)	<input checked="" type="radio"/> Yes	<input type="radio"/> No

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Answer: 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.

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

- |                                   |                                      |                                     |
|-----------------------------------|--------------------------------------|-------------------------------------|
| a. Voluntary Separations (PWTD)   | Yes                                  | <input checked="" type="radio"/> No |
| b. Involuntary Separations (PWTD) | <input checked="" type="radio"/> Yes | No                                  |

Answer: 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.

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.

Answer: 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

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

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

Answer: 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.

Answer: 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.

Answer: 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.

Answer: 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.

Answer: 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 plan Part H.8.

#### **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.

Answer: GSA had no requests for personal assistance services in FY21.

### Section VI: EEO Complaint and Findings Data

#### **A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Yes       No

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

Yes      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.

Answer: 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?

Yes      No

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

Yes      No

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

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

## Section VII: Identification and Removal of Barriers

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

Yes      No

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

Yes       No

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.

Answer:

- (1) In FY20, low participation of PWD and PWTD in mission critical occupations and within the high grade-level cluster were identified as the highest priority triggers for barrier analysis in FY21. Improvement of PWD data and correction of PWTD data in FY21 resulted in significant increases in the participation rates of PWD and PWTD, eliminating those two triggers.
- (2) 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 plan Part H.8.
- (3) 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. Objectives, planned activities, and the relevant responsible official are described in plan Part H.14. Several additional triggers described within the Part E Workforce Analysis are being investigated as potential barriers, including, but not limited to (a) untimely conversions of eligible (non-probationary) Schedule A(u) hires, (b) low rates of nomination and/or application of PWD to career development programs, and (c) relatively high utilization of direct hiring authority AYM. Plan Part H.14 and other Part H corrective plans address all identified Part G deficiencies related to employment of PWD and PWTD.
4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Answer: Not applicable. All planned activities are future events.

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

Answer: 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.

Answer: 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.






The Administrator

October 1, 2021

MEMORANDUM FOR ALL GSA EMPLOYEES

FROM: ROBIN CARNAHAN  
ADMINISTRATOR (A) 

SUBJECT: GSA Equal Employment Opportunity Policy Statement

I believe that we are best able to meet our mission when we have a workplace that values diversity, equity, inclusion, and accessibility (DEIA), and where everyone is treated with dignity and respect. Equal employment opportunity (EEO) is a key part of that.

We are committed to ensuring that all employees and applicants for employment have the freedom to compete on a fair and level playing field, free from discrimination or harassment based on any protected basis.

GSA's policy is to afford employees and applicants for employment equal opportunities, regardless of their race, color, religion, sex, pregnancy, gender identity, sexual orientation, national origin, age, disability, or genetic information (including family medical history). These equal employment opportunity protections pertain to all GSA personnel and employment programs, as well as management practices and decisions, including recruitment, hiring, promotions, transfers, reassignments, training and career development, benefits, and separation.

Additionally, reprisal against anyone who engages in protected EEO activity (e.g., reporting discrimination or harassment, participating in the EEO process, or exercising any rights provided by the civil rights statutes) will not be tolerated at GSA, and GSA supports the rights of all employees to exercise their rights under the civil rights statutes. Furthermore, workplace harassment will not be tolerated, and GSA is committed to correcting harassing conduct before it becomes severe or pervasive. Employees found to have unlawfully discriminated against or harassed another as defined by law may be subject to corrective action up to and including removal.

Employees or applicants who believe they have been unlawfully discriminated against and wish to initiate an EEO complaint may contact GSA's Office of Civil Rights at [eeo@gsa.gov](mailto:eeo@gsa.gov) or (202) 501-4571. Additional information is on GSAInSite.

Employees who believe they have been subject to, or have been a witness to, harassment may report the matter to their first line supervisor, another management official in their supervisory chain, or an Anti-Harassment Coordinator. See GSA Order HRM 9700.6 CHGE 2 for more information.

Integration of EEO and DEIA principles throughout GSA is something that we all can and should strive to support. Together, we can foster a workplace culture that clearly demonstrates our commitment to GSA's greatest strength and most valuable resource: our people.