

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

GSA is fully compliant in this measure.

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

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

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

GSA is fully compliant in this measure.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-11 to SES	11612	2784	23.98	394	3.39
Grades GS-1 to GS-10	753	229	30.41	56	7.44

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

In March 2023, GSA developed procedures governing conversions of eligible Schedule A(u) hires. Training provided to Office of Human Resources Management (OHRM) employees on the new procedures highlighted the GSA’s participation goals for PWD and PWTD, which exceed the respective Federal goals by 50%. In addition, the training was recorded and will be added to the GSA Online University. As part of agency efforts to improve use of Schedule A(u) and more timely conversions of Schedule A(u) hires, OHRM intends to make the training mandatory for all supervisors beginning in 2024.

Section II: Model Disability Program

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

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

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

Answer No

Prior to FY23, a significant number of deficiencies were identified (many of which affect the disability program) and four barriers were identified (all of which affect the disability program). In FY23, personnel resources could not simultaneously address all identified deficiencies and barriers. Thus, while support for the disability program increased in FY23, the personnel who would normally implement the “steady state” disability program needed to first focus on resolution of those deficiencies and barriers. As such, development and implementation of GSA's Affirmative Action Plan for PWD did not receive as much attention in FY23 as desired; however, the corrective efforts of related staff did result in notable progress in many areas that directly impact PWD (e.g., significant improvements related to Reasonable Accommodations and Schedule A(u)). Planned FY24 corrective efforts (including implementation of the AAP for PWD and further improvements to disability-related reasonable accommodations, Schedule A(u), and coordination between the AEP, DVAAP, and SPP) are addressed in multiple Part H corrective plans.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	0	0	1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Architectural Barriers Act Compliance	0	0	12	Michael Foegelle National Accessibility Officer michael.foegelle@gsa.gov
Processing reasonable accommodation requests from applicants and employees	20	0	0	Emily Claybrook Reasonable Accommodation Coordinator emily.claybrook@gsa.gov
Section 508 Compliance	0	0	23	Chuck Popelka/Daniel Perkins Section 508 Deputy/ Program Manager charles.popelka@gsa.gov; dan.perkins@gsa.gov
Special Emphasis Program for PWD and PWTD	0	0	3	John Bagwell/Hayden Shock Special Placement Program Coordinator john.bagwell@gsa.gov/ hayden.shock@gsa.gov

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

Answer Yes

All staff members with disability-related responsibilities are required to receive annual training within their respective specialties (e.g., Human Resources, Information Technology, Facilities Management); however, additional refresher training may be appropriate for participants in the reasonable accommodations process (e.g., supervisors, Local Reasonable Accommodations Coordinators, legal representatives) to make further improvements to processing timeliness. Separately, training is planned in FY24 for supervisors regarding use of the Schedule A(u) authority.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer Yes

One notable accomplishment related to funding of disability program efforts is that in FY23, the Office of Human Resources Management created an American Sign Language (ASL) interpreter contract, with centralized funding, to assist deaf and hard of hearing employees gain improved accessibility to enterprise-wide events, meetings, and trainings. During FY24, one planned area of analysis of funding resources relates to funding for disability-related outreach and recruitment efforts.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]
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Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
Objective	Timely deny or provide effective disability-related reasonable accommodations within 30 days of requests for accommodation, absent extenuating circumstances, and not including time required to obtain additional medical documentation (if required and requested).		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2023	Significant improvements were made to the collection, management, sharing, and use of data on requests for disability-related reasonable accommodations. Those improvements not only resolved Part G measure E.4.a.6 (systems to accurately collect, monitor, and analyze processing of requests for reasonable accommodation) and measure B.4.a.1 (resources required to conduct a self-assessment of the agency for possible deficiencies), but also contributed directly to a significant reduction in untimely processing (under measure C.2.b.5), as well as added new capability to track the time required to provide approved accommodations (a Part J measure of effectiveness).	

Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
Objective	Conduct regular collaborative OCR and OHRM meetings to develop/implement plans to improve recruitment, hiring, advancement, and retention of PWD.		
Target Date	Jul 29, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2023	GSA developed procedures to improve management, tracking, and reporting of employees appointed under the Schedule A(u) authority for individuals with intellectual disabilities, severe physical disabilities, or psychiatric disabilities. Among other intended outcomes, the procedures will address an identified barrier associated with untimely conversion of eligible Schedule A(u) employees from the excepted service to the competitive service.	

Brief Description of Program Deficiency	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)]		
Objective	Incorporate questions into the GSA exit survey on how GSA can improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2023	A general question was added to the GSA exit survey to identify the extent that unlawful discrimination and/or harassment influenced employee decisions to leave the agency.	

Brief Description of Program Deficiency	D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]		
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Brief Description of Program Deficiency	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)]		
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Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

GSA utilizes OPM’s Shared Register of Candidates with Disabilities and the Workforce Recruitment Program (WRP). Additionally,

GSA's entry-level consolidated recruitment program conducted both in-person and virtual outreach to a variety of PWD/PWTD-focused institutions (e.g., Rochester Institute of Technology, Gallaudet University) utilizing, where possible, alumni of those institutions to be part of those engagements. Additionally, the agency uses the USAJOBS hiring path for Individuals with Disabilities to identify positions that are open to candidates who identify as such. The application process allows the applicant to self-identify as a person who is eligible for hire under a special hiring authority and to name the special hiring authority specifically. GSA's Selective Placement Program coordinator (SPPC) helps the agency recruit, hire, and accommodate people with disabilities. The SPPC also provides guidance through the application process and answers questions from applicants, employees, and hiring managers relating to the hiring of PWD.

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

Collectively, GSA's current employees were appointed using a total of 94 different authorities. Of those, there are eight authorities that always take disability into account (e.g., Schedule A(u) appointments or conversions, 30% or More Disabled Veteran appointments or conversions, or appointment of disabled veteran from Veterans Affairs program) and there are two additional authorities (Veterans' Recruitment Appointments (VRA) and Veterans Employment Opportunity Act (VEOA)) that may take disability into account, but may also be used to appoint individuals without disabilities. Overall, 638 employees have been appointed by authorities that always take disability into account; however, of those, only 441 (69%) identify as having a disability. Discounting Schedule A(u) appointments and conversions, 201 employees have been appointed by authorities that always take disability into account, but only 76 (38%) identify as having a disability. With respect to the VRA and VEOA authorities, of 584 appointments, only 119 (20%) identify as having a disability; however, 273 VRA and VEOA appointees (47%) have either Veterans Preference Code (VPC) 04 or 06, which, by definition, indicate a service-connected disability. Overall, approximately 900 GSA employees who have VPC 04 or 06 are not identified in the system of record as having a disability, and of those, approximately half are identified as having no disability. The Schedule A(u) appointment authority and other hiring authorities that take disability into account are included as hiring mechanisms in job announcements; however, they are widely not used as targeted recruitment tool. The agency's Merit Promotion announcements specifically include the USAJOBS Hiring Path for "Individuals With Disabilities" to identify that the vacancy is open to those who meet that criteria. Where applicable and when such a selection is made, the Schedule A(u) hiring authority is cited for the hire. The agency also utilizes the Department of Labor's Workforce Recruitment Program to supplement entry-level hiring efforts. Analysis of the most-used appointment authorities during FY22 and FY23 identified 13 authorities that account for 90% of all appointments. Of those top authorities, WUM (Schedule A(u)) and LZM (Conversion of 30% or More Disabled Veterans) were the 7th and 11th most used, respectively, accounting for 7% of appointments during FY22 and FY23; however, of appointments under those authorities, 18% do not identify as having a disability. Determining and addressing the root causes for low self-identification of disability status is a high priority.

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

Applicants who apply under Schedule A(u) via USAJOBS have eligibility determined via the same evaluation process as other candidates; however, they are placed on a separate certificate for hiring managers' consideration. The agency advises applicants in vacancy announcements of the documentation requirements for claiming eligibility under special hiring authorities (including Schedule A(u)). When applications are reviewed by human resources specialists, eligibility determinations are made on the basis of the supporting documentation which may include a disability letter from a doctor or a licensed medical professional that proves their eligibility for Schedule A(u) appointment. Once eligibility is determined, the candidate is also reviewed for meeting qualification requirements. An eligible, qualified Schedule A(u) applicant is referred on the non-competitive merit promotion referral list to management for review with other candidates.

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

Answer Yes

Managers and supervisors are required take initial and recurring training courses, some of which include topics related to hiring authorities, including Schedule A(u). All managers and supervisors were compliant with this requirement in FY23. Additional training is planned for FY24 to educate hiring managers about new Schedule A(u) procedures.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

The GSA National Recruitment Center maintains regularly updated lists of candidate sourcing options that include PWD-focused groups and organizations (identified by both region or occupation) as well as PWD-focused contacts within schools and universities (e.g., disability services directors, disability resource directors, and disability support offices).

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

No triggers exist in this measurement area.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	5081	95.06	4.66	47.33	2.09
% of Qualified Applicants	4074	94.45	5.28	46.61	2.33
% of New Hires	30	93.33	3.33	30.00	0.00

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

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

Some mission-critical occupations have triggers related to differences between relevant applicant pools and applicants and/or between qualified applicants and selectees; however, meaningful analyses of these issues are negatively impacted by extremely low rates of self-identification. In FY23, only 4.7% of applicants self-identified their disability status.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0201 HUMAN RESOURCES MANAGEMENT	1	100.00	100.00

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0301 MISC ADMINISTRATION AND PROGRAM	4	100.00	25.00
0343 MANAGEMENT AND PROGRAM ANALYSIS	1	100.00	0.00
0501 FINANCIAL ADMINISTRATION AND PROGRAM	4	100.00	50.00
0560 BUDGET ANALYSIS	1	100.00	0.00
1101 GENERAL BUSINESS AND INDUSTRY	3	100.00	33.33
1102 CONTRACTING	10	90.00	20.00
1170 REALTY	2	100.00	50.00
1176 BUILDING MANAGEMENT	0	0.00	0.00
2210 INFORMATION TECHNOLOGY MANAGEMENT	3	100.00	33.33

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

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

Some mission-critical occupations have triggers related to differences between relevant applicant pools and applicants and/or between qualified applicants and selectees; however, meaningful analyses of these issues are negatively impacted by extremely low rates of self-identification. In FY23, only 4.7% of applicants self-identified their disability status.

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

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

Some mission-critical occupations have triggers related to differences between relevant applicant pools and applicants and/or between qualified applicants and selectees; however, meaningful analyses of these issues are negatively impacted by extremely low rates of self-identification. In FY23, only 4.7% of applicants self-identified their disability status.

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

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

A. ADVANCEMENT PROGRAM PLAN

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

GSA provides career development opportunities for all eligible employees (not just PWD) through various Competitive Development Programs (CDPs). In FY23, GSA made improvements to data tracking and analysis related to additional internal career development opportunities advertised through the GSA Opportunity Network, a developmental program that offers a variety of temporary opportunities to GSA's workforce, including PWD. Those opportunities include (1) part-time projects, (2) job shadowing experiences, (3) full-time details to the same grade level/unclassified duties of 120 days or less, and (4) full-time temporary promotions of 120 days or less. In FY23, analysis of GSA's top 20 most populous occupational series identified eleven occupational series with relatively high percentages of their respective positions at the GS14 level or higher (including four series with 50% or more of their positions at the GS14 level or higher and seven with between 25% and 50%), as well as nine occupational series that had inherently lower advancement opportunities (including five series with between 5% and 25% of positions at GS14 or higher and four occupations with fewer than 5% of positions at GS14 or higher). Two of the top twenty series have no positions above GS13. PWD were found to have higher than expected participation in six of the seven most populous occupations with the lowest percentage of positions at GS14 or higher. In FY24, GSA plans to (1) conduct further root cause analysis into advancement opportunities and (2) begin capturing and analyzing data on mentoring programs offered by particular GSA Services or Staff Offices and/or related to specific functional communities (e.g., acquisition program management). To develop the mandatory MD-715 data tables, statistics for career development 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).

B. CAREER DEVELOPMENT OPPORTUNITES

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

GSA provides career development opportunities for all eligible employees (not just PWD) through both external and internal programs. "Competitive Development Programs" are agency-wide offerings that provide leadership development opportunities via recognized external programs that focus on leadership competencies required for current and future leaders, and internal programs include both agency-wide opportunities (such as details, temporary promotions, and part-time projects advertised through the GSA Opportunity Network), as well as programs unique to particular offices, programs, or business lines. Specific CDPs vary from year to year. The FY23 CDPs included 15 grade-specific courses from 9 major sources, including (1) eCornell (Leadership Essentials and Intrapreneurship), (2) Eisenhower School National Defense University, (3) OPM Federal Executive Institute (FEI) Leadership for a Democratic Society, (4) Graduate School USA (Executive Leadership Program and Executive Potential Program), (5) Harvard Kennedy School (Senior Executive Fellows Program and Leadership Decision-Making Online Program), (6) OPM President's Management Council Interagency Rotation Program, (7) Partnership for Public Service (Foundations in Public Service Leadership Program, Excellence in Government Fellows Program, Leadership Excellence in Acquisition Program, and Preparing to Lead Program), (8) College of Information and Cyberspace National Defense University, and (9) White House Leadership Development Program. The programs each have different eligibility criteria, focus areas, and develop different competencies, up to and including Senior Executive Service candidate development. Internal GSA offerings include (1) GSA Start Program, (2) Targeted Leadership Development Program, (3) Mentoring Program, (4) Coaching services, and (5) Enterprise Emerging Leaders Program, as well as opportunities advertised through the GSA Opportunity Network for (1) part-time projects, (2) job shadowing experiences, (3) full-time details to the same grade level/unclassified duties of 120 days or less, and (4) full-time temporary promotions of 120 days or less. GSA's Mentoring Program and various sub-component mentoring programs establish professional relationships in which an experienced person (the mentor) supports and encourages employees to develop specific skills and knowledge that will maximize their business potential and improve their performance. The program includes a Resource Library, virtual training through GSA's Online University, self-assessments, tips, templates, and videos. In addition to managing the agency-level program, the Mentoring Program also helps subordinate organizations to create Mentoring Pilots, connects employees with Regional Mentoring Programs, and provides Mentoring Essentials training for new employees. Additionally, GSA's Phased Retirement Guidelines and Procedures (HRM 9900.1) contain a requirement for a phased retiree to spend at least 20 percent of his/her working hours mentoring. The Enterprise Emerging Leaders Program (EELP) is a two-year development program that provides entry level talent (recently hired GS7-GS9 employees on a career ladder promotion track to GS12) with rotational opportunities, core technical and professional leadership training, and mentoring to ensure that new hires gain the knowledge, skills, and abilities required to successfully perform in mission critical positions across the agency. The program gives employees a strong foundation for their careers, making them well-rounded employees, capable of serving the agency in a wide range of offices. The purpose of the EELP is to provide the necessary training, experiences, and support to selected entry level employees so that, upon completion of the program, they are prepared for permanent placement in a GSA office. The GSA Start Program is an enterprise-wide developmental training curriculum for new, entry-level employees in grades GS7 through GS11 and in various occupational series. The virtual, one-year training provides new employees with professional development training focused on core competencies and offers additional

learning opportunities. The GSA Start Program supports new employees in building foundational GSA business knowledge, essential professional skills, and developing relationships during the training and beyond. Core competencies include Communication Skills, Conflict Management, Continual Learning, Influencing-Negotiating, Integrity-Honesty, Interpersonal Skills, Problem Solving, Public Service Motivation, and Team Building. At the individual level, every GSA employee is afforded the opportunity to complete Individual Development Plans (IDPs), which are guides to help employees reach career goals within the context of organizational objectives. IDPs are developmental "action" plans to move employees from where they are to where they want to be, and to provide the systematic steps to improve in areas that are not strengths and to build on strengths as individuals improve job performance and pursue career goals. IDPs serve many potential objectives, including learning new skills and competencies to improve current job performance; maximizing current performance in support of organizational requirements; assisting employees in reaching career development goals; increasing interest, challenge, and satisfaction in current positions; and/or obtaining knowledge, skills, and abilities necessary for a change in grade level (i.e., promotion), occupational series, or fields. IDPs require supervisor approval and may require higher-level authorization. While not a competitive program or directly associated with career development, GSA also maintains a comprehensive Leadership Development Framework derived from OPM Executive Core Qualifications (ECQs) that allows employees to focus on leadership competencies throughout the various stages of their careers, in preparation for future opportunities. That Framework identifies 28 leadership competencies, divided into five ECQs: (1) Leading Change, (2) Leading People, (3) Results Driven, (4) Business Acumen, and (5) Building Coalitions; along with the Fundamental Competencies of Integrity/Honesty, Interpersonal Skills, Written Communication, Oral Communication, Continual Learning, and Public Service Motivation. Furthermore, the Framework is divided into five major roles, each aligned to particular grade levels, including: (1) Leading Self – Team Member (GS13 and below), (2) Leading Teams – Supervisor (GS13-GS14), (3) Leading Organizations – Manager (GS14-GS15), (4) Leading Strategy – Executive (SES), and (5) Fundamental Programs (all GSA employees).

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs	0	0	0	0	0	0
Training Programs	102	33	32.35	27.27	5.00	3.03
Coaching Programs	0	0	0	0	0	0
Fellowship Programs	40	23	15.00	8.70	0.00	0.00
Other Career Development Programs	121	69	25.62	24.64	2.48	1.45
Detail Programs	218	59	27.98	28.81	7.29	3.85
Internship Programs	1940	130	3.87	3.08	2.53	1.54

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

a. Applicants (PWD) Answer Yes

b. Selections (PWD) Answer Yes

PWD have higher participation rates among applicants than selectees for all career development programs, except details.

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

a. Applicants (PWTD) Answer Yes

b. Selections (PWTD)

Answer Yes

PWTD have higher participation rates among applicants than selectees for all career development programs.

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

Yes; there are triggers for PWD and PWTD in time-off awards between 11 hours and 40 hours. With respect to cash awards, there are triggers of both PWD and PWTD in all categories, except \$1000-\$1999 for both PWD and PWTD.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	932	9.23	6.84	11.11	8.90
Time-Off Awards 1 - 10 Hours: Total Hours	6420	62.20	47.70	74.00	60.12
Time-Off Awards 1 - 10 Hours: Average Hours	6.89	0.22	0.08	1.48	0.00
Time-Off Awards 11 - 20 hours: Awards Given	477	3.29	4.13	2.22	3.47
Time-Off Awards 11 - 20 Hours: Total Hours	7552	51.34	65.49	35.11	54.19
Time-Off Awards 11 - 20 Hours: Average Hours	15.83	0.52	0.18	3.51	-0.01
Time-Off Awards 21 - 30 hours: Awards Given	158	0.96	1.38	0.89	0.98
Time-Off Awards 21 - 30 Hours: Total Hours	3917	23.96	34.23	22.44	24.23
Time-Off Awards 21 - 30 Hours: Average Hours	24.79	0.83	0.28	5.61	-0.01
Time-Off Awards 31 - 40 hours: Awards Given	40	0.23	0.37	0.22	0.23
Time-Off Awards 31 - 40 Hours: Total Hours	1348	7.97	12.36	7.11	8.12
Time-Off Awards 31 - 40 Hours: Average Hours	33.7	1.14	0.37	7.11	0.09
Time-Off Awards 41 or more Hours: Awards Given	1789	16.46	13.88	15.33	16.66
Time-Off Awards 41 or more Hours: Total Hours	100420	893.99	790.72	843.56	902.85
Time-Off Awards 41 or more Hours: Average Hours	56.13	1.80	0.64	12.22	-0.03

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	467	2.69	4.09	2.89	2.65
Cash Awards: \$501 - \$999: Total Amount	328709.4	1911.35	2879.68	2139.78	1871.24
Cash Awards: \$501 - \$999: Average Amount	703.87	23.60	7.85	164.60	-1.16

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$1000 - \$1999: Awards Given	1171	12.05	8.51	12.44	11.98
Cash Awards: \$1000 - \$1999: Total Amount	1906769.45	20194.07	13713.13	19672.44	20285.66
Cash Awards: \$1000 - \$1999: Average Amount	1628.33	55.63	17.97	351.29	3.72
Cash Awards: \$2000 - \$2999: Awards Given	2712	17.79	23.55	18.22	17.71
Cash Awards: \$2000 - \$2999: Total Amount	6635689.85	42568.01	57980.08	43223.33	42452.95
Cash Awards: \$2000 - \$2999: Average Amount	2446.79	79.42	27.45	527.11	0.81
Cash Awards: \$3000 - \$3999: Awards Given	1103	7.77	9.32	8.00	7.73
Cash Awards: \$3000 - \$3999: Total Amount	3811473.51	27098.17	32131.25	27405.78	27044.17
Cash Awards: \$3000 - \$3999: Average Amount	3455.55	115.80	38.43	761.27	2.48
Cash Awards: \$4000 - \$4999: Awards Given	1237	7.24	11.08	5.56	7.53
Cash Awards: \$4000 - \$4999: Total Amount	5598456.92	32291.60	50316.01	24918.89	33586.07
Cash Awards: \$4000 - \$4999: Average Amount	4525.83	148.13	50.62	996.76	-0.87
Cash Awards: \$5000 or more: Awards Given	1828	6.51	17.83	7.78	6.28
Cash Awards: \$5000 or more: Total Amount	11874554.49	40841.62	116327.45	55289.11	38304.99
Cash Awards: \$5000 or more: Average Amount	6495.93	208.38	72.75	1579.69	-32.39

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

a. Pay Increases (PWD) Answer Yes

b. Pay Increases (PWTD) Answer Yes

Both PWD and PWTD received Quality Step Increases (QSI) at a lower rate than persons without disabilities.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	95	0.23	0.97	0.89	0.12

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

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

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

Data on other types of recognition is not currently available.

D. PROMOTIONS

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

a. SES

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

For SES, there was no data provided in FY23 relating to internal selections. This issue was previously identified as a data shortfall by the EEOC and is one of several planned focus areas for FY24. PWD triggers among internal competitive promotions are negatively impacted by extremely low rates of self-identification of disability status. In FY23, only 4.7% of applicants self-identified their disability status.

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

a. SES

- i. Qualified Internal Applicants (PWTD) Answer N/A
- ii. Internal Selections (PWTD) Answer N/A

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

For SES, there was no data provided in FY23 relating to internal selections. This issue was previously identified as a data shortfall by the EEOC and is one of several planned focus areas for FY24. PWTD triggers among internal competitive promotions are negatively impacted by extremely low rates of self-identification of disability status. In FY23, only 4.7% of applicants self-identified their disability status.

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

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

For SES, there was no data available relating to new hires. PWD triggers among new hires are negatively impacted by extremely low rates of self-identification of disability status. In FY23, only 4.7% of applicants self-identified their disability status.

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

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

For SES, there was no data available relating to new hires. PWTD triggers among internal competitive promotions are negatively impacted by extremely low rates of self-identification of disability status. In FY23, only 4.7% of applicants self-identified their disability status.

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

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

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

For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. In FY23, 4.7% of applicants self-identified their disability status.

6. Does your agency have a trigger involving PWTB 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 (PWTB) Answer No
 - ii. Internal Selections (PWTB) Answer Yes
- b. Managers
 - i. Qualified Internal Applicants (PWTB) Answer No
 - ii. Internal Selections (PWTB) Answer Yes
- c. Supervisors
 - i. Qualified Internal Applicants (PWTB) Answer No
 - ii. Internal Selections (PWTB) Answer Yes

No data was available for internal competitive promotions to the Executive level. Addressing this issue is among several FY24 priorities. PWTB triggers are negatively impacted by extremely low rates of self-identification of disability status. In FY23, only 4.7% of applicants self-identified their disability status.

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

- a. New Hires for Executives (PWD) Answer Yes
- b. New Hires for Managers (PWD) Answer Yes
- c. New Hires for Supervisors (PWD) Answer Yes

PWD triggers are negatively impacted by extremely low rates of self-identification of disability status. In FY23, only 4.7% of applicants self-identified their disability status.

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

- a. New Hires for Executives (PWTB) Answer No

- b. New Hires for Managers (PWTD) Answer No
- c. New Hires for Supervisors (PWTD) Answer Yes

For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. In FY23, 4.7% of applicants self-identified their disability status.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

In FY23, OHRM launched efforts (1) to determine if identified employees meet the requirements to be converted, (2) to convert eligible employees (beginning with the most recently eligible employees), and (3) to implement reminders to notify managers so that timely conversion can occur. New procedures were developed and implemented in FY23 and conversions of all Schedule A(u) employees who are currently overdue are planned to be completed in FY24.

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

- a. Voluntary Separations (PWD) Answer Yes
- b. Involuntary Separations (PWD) Answer Yes

The percentage of PWTD among involuntary separations exceeded those of persons without disabilities.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	42	0.45	0.29
Permanent Workforce: Resignation	151	1.59	1.05
Permanent Workforce: Retirement	325	2.26	2.64
Permanent Workforce: Other Separations	357	3.15	2.69
Permanent Workforce: Total Separations	875	7.46	6.67

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

- a. Voluntary Separations (PWTD) Answer No
- b. Involuntary Separations (PWTD) Answer Yes

Among Voluntary Separations, People without Disabilities (PWoD) had an Inclusion Rate (IR) of 3.8 percent; however, PWTD had an inclusion rate of 4.0 percent. Among Involuntary Separations, People without Disabilities (PWoD) had an Inclusion Rate (IR) of

3.1 percent; however, PWTD had an inclusion rate of 3.6 percent.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	42	1.05	0.30
Permanent Workforce: Resignation	151	1.26	1.18
Permanent Workforce: Retirement	325	2.52	2.55
Permanent Workforce: Other Separations	357	2.31	2.82
Permanent Workforce: Total Separations	875	7.13	6.86

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.

GSA does not conduct exit interviews and 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.9 addresses resolution of the deficient exit survey language. Analysis of 620 exit survey narratives from 2019 through 2023 found only a few responses related to unfavorable perceptions about accessibility or reasonable accommodation, some of which could not be reconciled with data from the reasonable accommodations system (e.g., the exit survey complained about a lack of accommodation; however, there is no record of the request for disability-related reasonable accommodation within the reasonable accommodations system). In addition to evaluating exit survey results, GSA also planned in FY22 to obtain a more complete picture of potential reasons for employee separations by correlating relevant data between systems; however, data relating to reasonable accommodations and allegations of harassment was incomplete, and did not include requested data elements necessary to correlate statistics with EEO complaints and employee separation data.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

Information on rights associated with Section 508 of the Rehabilitation Act is at <https://www.gsa.gov/website-information/accessibility-statement>. Information on how to file a Section 508 complaint is available (to employees only) via the internal GSA-only website (<https://insite.gsa.gov/employee-resources/information-technology/it-accessibility-section-508/file-a-508-complaint?term=508+complaint>) and can be accessed by applicants at www.gsa.gov by searching for the term “508 complaint.”

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

Information on rights associated with the Architectural Barriers Act (ABA) is on the public site <https://www.gsa.gov/real-estate/design-construction/accessible-facility-design>, which includes a link to the GSA Accessibility Desk Guide and information on how to file ABA complaints through the U.S. Access Board via their publicly accessible online complaint form (<https://www.access-board.gov/enforcement/>).

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

GSA is committed to making Federal buildings and facilities fully accessible to all people, and achieving accessibility is reflected in GSA’s commitment to excellence in design, development, and construction. GSA is dedicated to meeting or exceeding Federal, state, and local accessibility standards and to ensuring the full integration of individuals with disabilities who use our facilities. Because GSA's facilities are flexible and adaptable, providing employees and visitors with disabilities the opportunity to take part in all the programs, services, and activities our buildings are designed to support is an attainable goal. GSA is also addressing physical accessibility by aligning the GSA DEIA Strategic Plan with the Executive Order 14035 through the National Accessibility Program.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

In FY23, the average time to approve or deny requests for disability-related reasonable accommodations was 16.7 days and the average time to provide approved accommodations was 5.2 days. For requests that were approved or approved with modification, the average combined time to approve the requests and provide the approved accommodations was 19.9 days.

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

Significant improvements were made to the reasonable accommodations system during FY23, including major reductions in untimely processing and introduction of new data elements to track timeliness of providing approved accommodations. Overall, 11% of FY23 requests were untimely decided and 3% were untimely provided, which is a significant improvement over FY20 through FY22, when 38% were untimely decided, and no data was captured to determine how long it took to provide approved accommodations. FY24 plans include developing potential mechanisms to follow up on approved accommodations, to determine if provided accommodations were effective. Planned improvements to the reasonable accommodations program are addressed in plan Part H.4.

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

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

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

GSA had no requests for personal assistance services in FY23.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer Yes

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

One complaint alleging harassment based on disability and retaliation resulted in a finding. Corrective measures included \$50,000 in nonpecuniary damages, \$160,414.50 in backpay, and \$30,196.80 in attorney's fees, as well as reinstatement to a position within the agency and expungement of adverse material from complainant's Official Personnel File. Seven complaints alleging harassment based on disability status resulted in settlements. In FY23, EEOC calculated the government-wide average for formal complaints filed by PWD alleging harassment as 23.12%.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer Yes

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

No complaints alleging failure to provide a reasonable accommodation resulted in findings. One complaint alleging reasonable accommodation as an issue resulted in a settlement. In FY23, EEOC calculated the government-wide average for formal complaints filed by PWD alleging failure to accommodate as 13.79%.

Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

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

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

Source of the Trigger:		Other			
Specific Workforce Data Table:		Workforce Data Table - B1			
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		Insufficient implementation of the Affirmative Action Plan for PWD was identified in FY21 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. Both issues continued throughout FY22.			
Provide a brief narrative describing the condition at issue.					
How was the condition recognized as a potential barrier?					
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i>			
		People with Disabilities			
		People with Targeted Disabilities			
Barrier Analysis Process Completed?:		Y			
Barrier(s) Identified?:		Y			
STATEMENT OF IDENTIFIED BARRIER:		Barrier Name		Description of Policy, Procedure, or Practice	
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Insufficient implementation of AAP for PWD		Insufficient implementation of the Affirmative Action Plan for PWD was identified as an overarching barrier affecting aspects of recruitment, hiring, advancement, and retention of PWD. Similarly, shortfalls in execution and coordination of the DVAAP and SPP also directly affect opportunities for PWD.	
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
01/12/2022	07/29/2022	Yes	10/31/2024		Conduct regular collaborative OCR and OHRM meetings to develop and implement plans to improve recruitment, hiring, advancement, and retention of PWD, including coordination of efforts with HR recruitment programs (e.g., Selective Placement Program (SPP), and Disabled Veterans Affirmative Action Program.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
EEO Director		Aluanda Drain		Yes	
Chief Human Capital Officer		Arron Helm		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
07/29/2022	Implementation of the Affirmative Action Plan for PWD was also identified through a deficiency in Part G measure C.4.e.1 (collaboration on the AAP for PWD), and is also closely related to deficiencies with measures C.4.e.2 (recruitment initiative related to PWD), D.4.b (encouraging PWD to apply to vacancies). Resolution of all of those deficiencies, including separate planned milestone activities for execution, is addressed under the Part H corrective plan for measure C.4.e.1. In addition, the Part H plan addressing Part G measure C.4.e.4 (collaboration on barrier analysis) includes as planned activities quarterly oversight meetings with OCR and OHRM leadership that include status and progress updates on activities related to the Affirmative Action Plan for PWD.	Yes	10/31/2024	
Report of Accomplishments				
Fiscal Year	Accomplishment			

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

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

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

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

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

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

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

Major efforts in reasonable accommodations lead to significant reduction of processing times of requests for reasonable accommodations, as well as major improvement to data capture, monitoring, and sharing. With respect to Schedule A(u), efforts resulted in new procedures, agency-wide communications about use of Schedule A(u) and management obligations and plans relating to timely conversions of Schedule A(u) employees.

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

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