

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

GSA is fully compliant in this measure.

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

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

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

GSA is fully compliant in this measure.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	648	212	32.72	44	6.79
Grades GS-11 to SES	10955	2414	22.04	342	3.12

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

GSA has not communicated the agency's numerical participation goals for PWD and PWTD to hiring managers as part of the staffing/hiring strategic conversation. In FY23, OHRM plans to include this information in the job analysis that is presented during the strategic conversation.

Section II: Model Disability Program

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

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

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

Answer No

Key programs and activities were unable to effectively support the disability program in FY22, in part due to insufficient qualified staffing and in part to prioritization of other efforts related to COVID-19 procedures (e.g., vaccinations, return-to-work) and/or DEIA program initiatives. Two OHRM program managers were subsequently hired in FY22 to jointly support DEIA and MD-715 efforts (one of whom also serves as SPPC, DVAAP Manager, and FEORP Manager); however, resources were insufficient in FY22 to effectively support efforts to recruit, hire, advance, or retain PWD and PWTD. The agency did not take specific steps in FY21 or FY22 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 (1) data from appointment authorities that take disability into account or (2) data from requests for reasonable accommodations to correct inaccurate disability status information. Schedule A(u) hires are able to self-identify incorrect disability status codes. Improvements to these identified shortfalls are addressed in multiple Part H corrective plans.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	0	0	1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
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.plank@gsa.gov
Section 508 Compliance	0	0	23	Chuck Popelka/Daniel Perkins Section 508 Deputy/ Program Manager charles.popelka@gsa.gov; dan.perkins@gsa.gov
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 No

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

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer No

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

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]		
Objective	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.		
Target Date	Sep 30, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 23, 2022		Make relevant changes to reasonable accommodations processing procedures to elevate visibility of requests that are approaching or have exceeded the established deadline, with goals of providing enhanced oversight, reducing processing times, identifying and tracking root causes for processing delays, and enabling iterative improvements through tracking of lessons learned and application of best practices.
	Sep 30, 2022		Research all requests for reasonable accommodation that were untimely processed in FY20, FY21, and FY22, in order to identify root causes and contributing factors, and develop and implement appropriate corrective and preventative measures
	Sep 30, 2022		The National Reasonable Accommodation Program Manager will (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. Collaborate with the AEPM to support (a) the MD-715 Part
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2022	OHRM made enhancements to the case management system to improve reasonable accommodations data.	

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	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.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2022		Resolution of this deficiency is addressed in the Part H plan for B.4.a.10.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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	Develop and implement regular collaborative meetings and objectives relating to each of the four major focus areas of the Affirmative Action Plan (AAP) for Persons with Disabilities (PWD) (i.e., (1) recruitment, (2) hiring, (3) advancement, and (4) retention of PWD), as well as collaborative meetings to coordinate efforts with HR recruitment programs (e.g., Federal Equal Opportunity Recruitment Program (FEORP), Selective Placement Program (SPP), and DVAAP).		
Target Date	Jul 29, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jun 30, 2022		Establish and conduct meetings, no less than quarterly, between the AEPM, FEORP Manager, SPP Coordinator, and DVAAP Manager to coordinate program activities; review plans, status, and progress; and to identify areas of potential collaboration.
	Jun 30, 2022		Identify relevant HR subject matter experts (SMEs) for each of the four AAP focus areas and establish regular monthly meetings for each of the four AAP focus areas between the HR SMEs, PWD SEP Co-Managers (SEPMs), DEIA Program Manager, and the Affirmative Employment Program Manager 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/goals.
	Jul 29, 2022	August 9, 2022	Establish agency participation goals for PWD and persons with targeted disabilities (PWTD). Consider setting an initial goal 50% higher than the federal goals of 12% for PWD and 2% for PWTD within both low- and high-grade level clusters (i.e., GSA goals of 18% for PWD and 3% for PWTD).
	Sep 29, 2023		Develop and implement communications to inform hiring managers and recruiters of the new numerical goals.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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	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.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2021		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.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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)]		
Objective	Take specific steps to ensure qualified PWD/PWTD are aware of and are encouraged to apply for job vacancies.		
Target Date	Jul 29, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 29, 2022		Resolution of this deficiency is addressed in the plan for Part G measure C.4.e.1.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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)]		
Objective	Establish and communicate 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).		
Target Date	Jul 29, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 29, 2022		Resolution of this deficiency is addressed in the Part H plan for Part G measure C.4.e.1.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2022	GSA set new goals of 18% for PWD and 3% for PWTD.	

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

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

GSA utilizes OPM’s Shared Register of Candidates with Disabilities and the Workforce Recruitment Program (WRP); however, there were no agency-level efforts conducted in FY22 targeting recruitment of either PWD or PWTD. 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.

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

There were no agency-level efforts conducted in FY22 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. 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 WRP to supplement our entry level hiring efforts.

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 No

Managers and supervisors are required take initial and recurring training courses, some of which touch on topics relating to Schedule A(u); however, not all hiring managers were compliant with the training requirements, and the coverage of this topic in the curriculum is limited. Effectiveness of that training may be insufficient, as evidenced by issues relating to onboarding data that appears inaccurate and/or inconsistent with regulations. Further investigations into these issues, as well as planned improvements, are addressed in multiple Part H corrective plans.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

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

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	5260	68.56	4.07	33.71	1.73
% of Qualified Applicants	3904	68.52	3.92	32.35	1.72
% of New Hires	63	73.02	6.35	31.75	3.17

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

a. New Hires for MCO (PWD) Answer Yes

b. New Hires for MCO (PWTD) Answer Yes

The following mission critical occupational series have lower participation of PWD among new hires, compared to the participation rate among qualified applicants: 0501, 0905, 1170, and 2210. The following mission critical occupational series have lower participation of PWTD among new hires, compared to the participation rate among qualified applicants: 0201, 0343, 0501, 0905, 1102, and 1170.

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	0.00
0301 MISC ADMINISTRATION AND PROGRAM	6	83.33	66.67
0343 MANAGEMENT AND PROGRAM ANALYSIS	9	88.89	22.22
0501 FINANCIAL ADMINISTRATION AND PROGRAM	0	0.00	0.00
0560 BUDGET ANALYSIS	1	100.00	100.00
0905 GENERAL ATTORNEY	0	0.00	0.00
1101 GENERAL BUSINESS AND INDUSTRY	15	80.00	40.00
1102 CONTRACTING	19	73.68	15.79
1170 REALTY	3	66.67	33.33
2210 INFORMATION TECHNOLOGY MANAGEMENT	5	60.00	60.00

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

- a. Qualified Applicants for MCO (PWD) Answer No
- b. Qualified Applicants for MCO (PWTD) Answer Yes

No triggers exist in this measurement area. 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. The mission critical occupational series 0501 has lower participation rates of PWTD among qualified applicants, compared to 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.

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

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

The mission critical occupational series 0343, 1101, 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. The mission critical occupational series 0343, 1101, and 1102 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).

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 PWD, have sufficient opportunities for advancement.

GSA provides career development opportunities for all eligible employees (not just PWD) through various Competitive Development Programs (CDPs). To develop the mandatory MD-715 data tables, those 27 CDPs 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 high nomination rates (relative to eligibility pools) and high selection rates (relative to nomination pools) for both PWD and PWT. Improving advancement opportunities for PWD is being addressed within plan Part H. 14 and other Part H corrective plans. GSA does not currently track statistics on opportunities associated with either details or mentoring programs. In FY23, GSA plans to begin capturing basic data related to the GSA Opportunity Network, a developmental program that offers a variety of temporary opportunities to GSA's workforce, including (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, as well as data on mentoring programs offered by particular GSA Services or Staff Offices and/or related to specific functional communities (e.g., acquisition program management).

B. CAREER DEVELOPMENT OPPORTUNITIES

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

GSA provides career development opportunities for all eligible employees (not just PWD) through various CDPs. The specific CDPs vary from year to year (with 6 offered in FY19, 7 offered in FY20, 11 offered in FY21, and 27 offered in FY22). The FY22 CDPs included multiple grade-specific courses from 8 major sources, including (1) eCornell (Leadership Essentials and Intrapreneurship), (2) Eisenhower School National Defense University, (3) 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), (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), and (8) White House Leadership Development Program. 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. 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		PWTB	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Training Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Internship Programs	1479	117	64	9	39	4
Fellowship Programs	54	24	11	6	3	3
Other Career Development Programs	188	57	39	13	8	3

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 No
- b. Selections (PWD) Answer No

The 27 FY22 CDPs were consolidated into the seven categories used in the mandatory MD-715 data tables, then assessed for triggers using that framework. Additionally, triggers were analyzed using eligibility pools, nomination rates, and selection rates within each individual course offering in each grade level. That latter analysis provides more detailed results; however, due to very

small populations of selectees for each grade-specific CDP, triggers are more prevalent than when analyzed using aggregate data; however, those arithmetic triggers are more a function of the benchmarking than discriminatory practices. Looking instead at consolidated statistics (covering all 27 CDPs), both PWD and PWTD have both overall nomination rates and overall selection rates that are higher than expected (i.e., favorable, compared to rates in relevant eligibility pools and nominee pools, respectively). For example, PWD comprise 19.6% of employees eligible for the CDPs, 20.7% of nominees to the CDPs, and 23.5% of selectees.

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 No
- b. Selections (PWTD) Answer No

The 27 FY22 CDPs were consolidated into the seven categories used in the mandatory MD-715 data tables, then assessed for triggers using that framework. Additionally, triggers were analyzed using eligibility pools, nomination rates, and selection rates within each individual course offering in each grade level. That latter analysis provides more detailed results; however, due to very small populations of selectees for each grade-specific CDP, triggers are more prevalent than when analyzed using aggregate data; however, those arithmetic triggers are more a function of the benchmarking than discriminatory practices. Looking instead at consolidated statistics (covering all 27 CDPs), both PWD and PWTD have both overall nomination rates and overall selection rates that are higher than expected (i.e., favorable, compared to rates in relevant eligibility pools and nominee pools, respectively). For example, PWTD comprise 2.7% of employees eligible for the CDPs, 4.6% of nominees to the CDPs, and 7.4% of selectees.

C. AWARDS

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

There are triggers for PWD in time-off awards between 11 hours and 40 hours and triggers for PWTD in time-off awards between 1 and 30 hours. With respect to cash awards, there are triggers of both PWD and PWTD in all categories, except \$500 and under for PWD and \$1000-\$1999 for both PWD and PWTD.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	0.00	0.00

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

There is a trigger for PWD, who received Quality Step Increases (QSI) at a rate of 0.46%, compared to the QSI rate of 1.23% for persons without disabilities, and a trigger for PWTD, who received QSI at a rate of 0.26%.

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

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

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

Data on other types of recognition is not currently available.

D. PROMOTIONS

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

- a. SES
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer Yes
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer 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 FY22 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-14, the rate of PWD among Internal Selections was 40%, compared to a rate of 58% among Qualified Internal Applicants. For GS-13, the rate of PWD among Internal Selections was 61%, compared to a rate of 73% among

Qualified Internal Applicants. Note: Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status.

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

a. SES

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

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

For SES, there was no data provided in FY22 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 27%; however, the rate among Internal Selections was only 13%. For GS-13, the rate of PWTD among Internal Selections was 28%, compared to a rate of 33% among Qualified Internal Applicants. Note: Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status.

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

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

For SES, there was no applicant flow data provided for new hires in FY22. 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 2 PWD selections among 358 qualified applicants from 56 announcements. For GS-14, there were 5 PWD selections among 509 qualified applicants from 122 announcements. For GS-13, there were 12 PWD selections among 733 qualified applicants from 223 announcements. Note: Trigger identification in this area was negatively impacted by a very low rate of applicant self-identification of disability status.

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

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

For SES, there was no applicant flow data provided for new hires in FY22. For GS-13, there were 6 PWTD selections among 344 qualified applicants from 223 announcements. Note: Trigger identification in this area was negatively impacted by a very low rate of applicant self-identification of disability status.

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

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

Trigger identification in this area was negatively impacted by an exceptionally low rate of applicant self-identification of disability status. For Executives, of 256 Qualified Internal Applicants, 9 identified their disability status, and of those, 7 (78%) were PWD; however, none were selected. For Managers, 52 (out of 772) Qualified Internal Applicants identified disability status, and of those, 30 (58%) identified as PWD; however, of the 15 selectees who identified their disability status, only 6 PWD (40%) were selected. For Supervisors, out of 732 Qualified Internal Applicants, 78 identified disability status and 57 (73%) identified as PWD; however, of the 18 selectees who identified their disability status, only 11 (61%) were PWD.

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

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

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

Trigger identification in this area was negatively impacted by an exceptionally low rate of applicant self-identification of disability status. For Executives, of 256 Qualified Internal Applicants, 9 identified their disability status, and of those, 1 was PWTD; however, zero were selected. For Managers, of 772 Qualified Internal Applicants, 52 identified their disability status, of whom 14 (27%) were PWTD. Among selectees, 15 identified their disability status, of whom 2 (13%) were PWTD. For Supervisors, of 732 Qualified Internal Applicants, 78 identified their disability status, of whom 26 (33%) were PWTD; however, of 18 Qualified Internal Applicants (out of 178) who identified disability status, 5 (28%) identified as PWTD.

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

: For Executives, only 8% of the Qualified Applicant Pool self-identified disability information, of whom 72% identified as PWD; however, among selectees, only 50% were PWD. For Managers, only 8% of the Qualified Applicant Pool self-identified disability information, of whom 74% identified as PWD; however, among selectees, only 63% were PWD. For Supervisors, 9% of the Qualified Applicant Pool self-identified disability information, of whom 72% identified as PWD; however, among selectees who self-identified disability information, only 55% were PWD.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWTD) Answer No
 - b. New Hires for Managers (PWTD) Answer No
 - c. New Hires for Supervisors (PWTD) Answer Yes

For Supervisors, 7% of the Qualified Applicant Pool self-identified disability information, of whom 33% identified as PWTD; however, among selectees who self-identified disability information, only 27% were PWTD.

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

All eligible Schedule A(u) employees have not been converted, because GSA has not been tracking or managing Schedule A(u) hires or their conversions. At the end of FY22, GSA had 231 employees with Schedule A(u) appointment codes. Of those, 44 Schedule A(u) hires had been employed by GSA for between 2.2 years and 37.3 years, but had not yet been converted to the competitive service. Overall, eligible Schedule A(u) employees who remained in the excepted service beyond 2.2 years (at the end of FY22) have been employed by the GSA for an average of eight years. Performance was not a factor relating to non-conversions, as ratings were assessed in FY21, when all non-converted Schedule A(u) employees were found to have received satisfactory (or better) performance ratings. An additional 49 Schedule A(u) employees will be at least two years past their respective latest appointment dates at the end of FY23. In FY22, OHRM conducted an analysis of how conversions are being handled and identified several factors contributing to untimely conversions. 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. [Note that initial analysis efforts provided an additional 2 months (0.2 years) to account for time associated with potential pending conversions, after completion of the 2-year probation period. This was intended to ensure that the number of non-converted eligible Schedule A(u) employees was not overestimated.]

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

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

Among Voluntary Separations, People without Disabilities (PWoD) had an Inclusion Rate (IR) of 8.8 percent; however, PWD had an inclusion rate of 9.4 percent. Among Involuntary Separations, PWoD had an IR of 0.29 percent; however, PWD had an IR of 0.46 percent.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	33	0.40	0.24
Permanent Workforce: Resignation	232	2.33	1.82
Permanent Workforce: Retirement	413	2.52	3.73
Permanent Workforce: Other Separations	334	3.90	2.46
Permanent Workforce: Total Separations	1012	9.15	8.25

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

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

Among Voluntary Separations, People without Disabilities (PWoD) had an Inclusion Rate (IR) of 8.8 percent; however, PWTD had an inclusion rate of 9.0 percent. Among Involuntary Separations, People without Disabilities (PWoD) had an Inclusion Rate (IR) of 0.29 percent; however, PWTD had an inclusion rate of 0.77 percent.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Removal	33	0.73	0.26
Permanent Workforce: Resignation	232	1.46	1.96
Permanent Workforce: Retirement	413	4.14	3.43
Permanent Workforce: Other Separations	334	2.68	2.79
Permanent Workforce: Total Separations	1012	9.00	8.43

- 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.19 addresses resolution of the deficient exit survey language. 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. Analysis of requests for reasonable accommodations for FY20, FY21, and FY22 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. GSA policy and procedures for providing reasonable accommodations (GSA Order HRM 2300.1 of December 14, 2021) require approved reasonable accommodations to be provided as soon as possible, but not to exceed 30 calendar days from receipt of requests (not including time required to obtain medical documentation, if necessary). During FY20, reasonable accommodations approvals and approvals with modification both took an average of 37 days; however, denials took an average of 70 days for a decision to be reached. 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. In FY22, the volume of requests for accommodation expanded by 500% from FY21 levels, with high numbers of requests relating to COVID-19 vaccination exemptions and telework. Trends in the processing time for approvals, approvals with modification, and denials remained, with approvals taking an average of 24 days for a decision to be reached, approvals with modification taking 29 days, and denials taking 43 days. Additionally, 10 requests that were in “pending” status at the end of FY22 averaged 165 days in processing as of September 30, 2022. Critically, GSA does not currently track how long it takes to provide accommodations, once approved. In FY22 there were three complaints filed with both removal as an issue and disability as a basis and six complaints filed for disability-related reasonable accommodation, as well as four settlements relating to disability and reasonable accommodations and one settlement relating to removal and disability. In FY21 there was one complaint filed with both removal as an issue and disability as a basis and one for disability-related reasonable accommodation, as well as six settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability). In FY20 there was one complaint filed with both removal as an issue and disability as a basis and eleven complaints filed for disability-related reasonable accommodation, as well as four settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability). In FY19 there were four complaints filed with both removal as an issue and disability as a basis and eight for disability-related reasonable accommodation, as well as one settlement relating to disability and reasonable accommodations (but no settlements relating to removal and disability). In FY18 there were no complaints filed with both removal as an issue and disability as a basis, but there were twelve filed for disability-related reasonable accommodation, as well as eight settlements relating to disability and reasonable accommodations (but no settlements relating to removal and disability).

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

Information on rights associated with Section 508 of the Rehabilitation Act is at <https://www.gsa.gov/policy-regulations/policy/information-integrity-and-access/it-accessibilitysection-508>. 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/508-accessibility/how-to-file-a-508-complaint>) and can be accessed by applicants at www.gsa.gov by searching for the term "508." Additionally, GSA Section 508 complaint procedures are publicly accessible at: [https://www.gsa.gov/cdnstatic/GSA%20508%20Complaint%20Procedures%20\(1\).pdf?_ga=2.17261177.1502383566.1677700064-1441148810.1663683102](https://www.gsa.gov/cdnstatic/GSA%20508%20Complaint%20Procedures%20(1).pdf?_ga=2.17261177.1502383566.1677700064-1441148810.1663683102)

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. In FY22, GSA's Public Buildings Service assessed the state of the design and construction industry in the areas of diversity, equity, inclusion, and accessibility and met with contractors and designers to identify successes, challenges, and how GSA can help the industry evolve together. In April, 2022, the GSA PWD Special Emphasis Program hosted a presentation by the GSA National Accessibility Program Manager and disseminated a link to the Accessibility Desk Guide and information about accessibility in the GSAbility News publication. 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.)

As of September 30, 2022, the average processing time for requests for reasonable accommodations in FY22 was approximately 31 days; however, that figure is subject to change. GSA policy and procedures are designed to provide reasonable accommodations as soon as possible, but not to exceed 30 calendar days from receipt of the request, unless extenuating circumstances exist. The system tracks the processing time from the date of the request to the date that a decision is reached; however, when medical documentation is required, the 30-day time limit is held in abeyance between the dates that medical documentation is requested and received. In some cases, employees do not timely provide requested medical documentation, so the system lacks a receipt date and is unable to calculate the processing time until a Local Reasonable Accommodations Coordinator (LRAC) manually updates the case information. At the end of FY22, several requests were awaiting medical documentation. Once medical documentation is received and/or the LRACs manually update the system to account for cases when medical documentation was requested by not provided, case-specific processing times will change, as will the overall average processing time. Of 414 requests, 256 (62%) were timely processed and 158 (38%) were untimely processed. Approved requests took an average of 24 days (although 115 approved requests (35%) took longer than 30 days to process). Requests that were approved with modification averaged 29 days (although 7 approved requests (54%) took longer than 30 days to process). Denied requests took an average of 43 days for a decision to be reached and 47% of denied requests took longer than 30 days to process. All figures reflect total days-in-process, minus all time between when medical documentation was requested and received, as of the end of FY22. FY22 processing performance was less favorable than

FY21, which averaged 25 days; however, the overall number of requests in FY22 (414) far exceeded the number of FY21 cases (80), due in large part to the high volume of FY22 requests relating to COVID vaccination exemptions and telework. A table outlining processing times for FY20, FY21, and FY22 reasonable accommodations approvals, approvals with modification, denials, and all decisions is available in the uploaded MD-715 report, which includes graphics and tables. Table 14 includes the relevant information.

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

Over the past four years, (1) approximately 35% of requests for reasonable accommodations have been untimely processed; (2) many requests have been very untimely, taking well beyond 30 days (even after properly accounting for time required to obtain medical documentation); and (3) data on reasonable accommodations has consistently been incomplete and/or inaccurate. The current reasonable accommodation data system does not track additional metrics of effectiveness, such as timeliness of providing approved accommodations. Planned improvements to the reasonable accommodations program are addressed in Part H corrective plans.

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

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

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

GSA had no requests for personal assistance services in FY22.

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.

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

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer 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. Four complaints alleging reasonable accommodation as an issue resulted in settlements.

Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

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 for the past three years was identified in FY21 as a barrier to PWD. Objectives, planned activities, and the relevant responsible official with authority and control over agency reasonable accommodations are described in Part H plans.				
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		
	Untimely processing of reasonable accommodations		Untimely processing of reasonable accommodations in FY20, FY21, and FY22 is a barrier to PWD.		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
03/16/2022	09/30/2022	Yes	09/29/2023		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.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Chief Human Capital Officer		Traci DiMartini		No	
EEO Director		Aluanda Drain		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/29/2022	Research all requests for reasonable accommodation that were untimely processed in FY20 and FY21, in order to identify root causes and contributing factors, and develop and implement appropriate corrective and preventative measures.	Yes	09/29/2023	
09/30/2022	The National Reasonable Accommodation Program Manager will (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. Collaborate with the AEPM to support (a) the MD-715 Part G assessment, (b) trigger identification, and (c) barrier analysis.	Yes	09/29/2023	
09/30/2023	Make relevant changes to reasonable accommodations processing procedures to elevate visibility of requests that are approaching or have exceeded the established deadline, with goals of providing enhanced oversight, reducing processing times, identifying and tracking root causes for processing delays, and enabling iterative improvements through tracking of lessons learned and application of best practices.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2022	OHRM made enhancements to the case management system to improve reasonable accommodations data .			

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?:		N			
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	09/29/2024		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.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Chief Human Capital Officer		Traci DiMartini		No	
EEO Director		Aluanda Drain		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
06/30/2022	Identify relevant HR subject matter experts (SMEs) for each of the four AAP focus areas and establish regular meetings between the HR SMEs, PWD Special Emphasis Program Co-Managers (SEPMs), DEIA Program Manager, and the Affirmative Employment Program Manager, no less than quarterly, to collaborate on generating plans; identifying resources/requirements; tracking progress toward attainment of AAP requirements and goals; and fulfilling MD-715, FEORP, and DVAAP reporting requirements. Convene initial meetings between the SMEs, PWD SEPMs, DEIA PM and AEPM no later than 6/30/2022. As initial topics, include discussion of agency PWD and PWTD participation rates, federal and agency goals, triggers, and trends; AAP contents; MD-715 reporting requirements; and relevant topics within each individual focus area.	Yes	09/29/2024	
06/30/2022	Establish and conduct meetings, no less than quarterly, between the AEPM, FEORP Manager, SPP Coordinator, and DVAAP Manager to coordinate program activities; review plans, status, and progress; and to identify areas of potential collaboration.	Yes	09/29/2023	
07/29/2022	Establish agency participation goals for PWD and persons with targeted disabilities (PWTD). Consider setting an initial goal 50% higher than the federal goals of 12% for PWD and 2% for PWTD within both low- and high-grade level clusters (i.e., GSA goals of 18% for PWD and 3% for PWTD).	Yes		08/09/2022
09/29/2023	Develop and implement communications to inform hiring managers and recruiters of the new numerical goals.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			

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?		Untimely processing of conversions of eligible Schedule A(u) hires from excepted to competitive service.			
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities			
Barrier Analysis Process Completed?:		N			
Barrier(s) Identified?:		N			
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 conversions of eligible Schedule A(u) employees from excepted to competitive service	Description of Policy, Procedure, or Practice Workforce data, beyond the level of the MD-715 workforce tables, shows 44 Schedule A(u) hires had been employed by GSA for between 2.2 years and 37.3 years, but had not yet 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
05/24/2022	09/29/2023	Yes			Timely convert eligible Schedule A(u) employees from excepted to competitive service.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Chief Human Capital Officer		Traci DiMartini		Yes	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date
09/29/2023	Develop and implement policy and procedures to timely convert eligible Schedule A(u) employees from excepted to competitive service.			Yes	
Report of Accomplishments					
Fiscal Year	Accomplishment				

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?	Employees in temporary status beyond specified timeframes.					
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 Schedule A(u) employee conversion status also identified that many Schedule A(u) and other 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	09/29/0023	Yes			Routinely review status of all temporary employees to ensure appropriate processing actions are taken and records are accurate.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Chief Human Capital Officer		Traci DiMartini		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
09/29/2023	Review current temporary employee records and initiate any changes necessary to reflect actual status.			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.

Workloads associated with COVID-19 return-to-work and vaccination policies and procedures negatively impacted efforts to address MD-715 deficiencies and barriers.

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

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

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

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