

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 Yes |

The participation rate of PWD in the high cluster is 10.45 percent, which is below the 12 percent goal; however, a comprehensive analysis of workforce data conducted in May 2021 identified 93 PWD (all PWTD) who were not being accounted for, because they retained old disability codes that should have been revised in 2017. Corrections to those coding errors were still underway at the time that this Part J data analysis was completed, so it does not include the total populations of PWD. cursory analysis of the corrections suggest overall PWD participation rates will increase by approximately 6 percent (i.e., from 10.95 percent to 11.65 percent); however, the exact impact on this trigger cannot be ascertained until the corrections are completed. The FY21 submission will include the corrected data.

*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 Yes |

The participation rate of PWTD in the high cluster is 1.92 percent, which is below the 2 percent goal; however, a comprehensive analysis of workforce data conducted in May 2021 identified 93 PWTD who were not being accounted for, because they retained old disability codes that should have been revised in 2017. Corrections to those coding errors were still underway at the time that this Part J data analysis was completed, so it does not include the total populations of PWTD. cursory analysis of the corrections suggest overall PWTD participation rates will increase by approximately 34 percent (i.e., from 2.10 percent to 2.82 percent); however, the exact impact on this trigger cannot be ascertained until the corrections are completed. The FY21 submission will include the corrected data. Given that the current (uncorrected) figure is very close to the 2 percent goal, and the significant increase in overall PWTD being achieved through correction of the coding error, it is anticipated that this trigger will not be present after the data is corrected.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	734	119	16.21	27	3.68

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES	10519	1093	10.39	200	1.90

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

Managers and supervisors take a complement of required courses when they become new supervisors, and the hiring goals related to disability are in reference material thereafter.

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

During Fiscal Year 2020, the agency did not have sufficient qualified personnel designated to implement its disability program. The agency did not have a SEPM for the People with Disabilities Program (PWDP), sufficient qualified personnel to effectively administer and oversee the Reasonable Accommodations Program, or an AEPM to develop and execute the Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of PWD . In March, 2021, GSA hired an AEPM. In April, 2021, GSA identified two Co-SEPMs for the PWDP, along with a senior executive to serve as an Executive Sponsor. Lastly, at the time of the drafting of this Part J, the GSA Workforce Relations Division was in the process of hiring an Employee Relations (ER) Program Manager to provide oversight of the Reasonable Accommodations Program (among other responsibilities). That individual is planned to be in place by July, 2021.

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	Taunya Stewart Special Program Placement Coordinator taunya.stewart@gsa.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Taunya Stewart Special Placement Program Coordinator taunya.stewart@gsa.gov
Section 508 Compliance	0	0	23	Evelyn Britton Branch Chief, External Programs evelyn.britton@gsa.gov
Architectural Barriers Act Compliance	0	0	2	Evelyn Britton/Rex Pace EP Branch Chief/Architect evelyn.britton@gsa.gov; rex.pace@gsa.gov

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Special Emphasis Program for PWD and PWTD	0	0	4	Taunya Stewart Special Placement Program Coordinator taunya.stewart@gsa.gov
Processing reasonable accommodation requests from applicants and employees	0	0	20	alexandra.vernacchio@gsa.

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 receive annual training within their respective specialties (e.g., Human Resources, Information Technology, Facilities Management, etc.).

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

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
Objective	Timely process all reasonable accommodation requests by (1) identifying all RA data, agency-wide (including both OHRM and OIG), (2) resolving all currently untimely requests, and (3) developing and implementing mechanisms to help prevent future requests from being untimely processed.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 1, 2021		Analyze all FY20 OHRM RA requests and all FY21 requests through June 1, 2021, to identify untimely processed cases and their potential causes.
	Sep 15, 2021		Address identified issues and appropriately close out (Approve, Approve with Modification, or Deny) all pending untimely reasonable accommodations requests and all new cases that will become untimely before September 1, 2021.
	Sep 30, 2021		Identify the OIG RA Program Manager, analyze OIG RA data for FY19 and FY20 for untimely processed requests, and take appropriate action to resolve deficiencies and ensure timely reporting of all OIG RA statistics.
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	Modify exit survey to add disability-specific questions as described in EEOC’s revised Part G checklist.		
Target Date	Jul 1, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 1, 2019 Sep 30, 2021	May 24, 2021	Develop revised exit survey questions that address requirements in EEOC’s revised Part G checklist. OHRM to review proposed exit survey questions, incorporate them into the GSA Exit Survey, and disseminate the new survey (e.g., update links, etc.).
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	In April, 2021, the OCR reviewed the GSA Exit Survey for compliance, developed seven relevant questions to be included in the next survey revision, and provided business rules to govern the survey format, response options, and processing of EEO-related questions. The revised questions were forwarded to OHRM on May 24, 2021.	

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 uses OPM’s Shared Register of Candidates with Disabilities, the Workforce Recruitment Program (WRP), and targeted recruitment.

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

A Special Placement Program Coordinator (SPPC) coordinates special placement. When qualified candidates are located, the SPPC works with local Human Resources specialists to effect the hires and coordinate onboarding and, where applicable, to coordinate reasonable accommodations.

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

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

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

this training.

Answer Yes

Managers and supervisors take a complement of required courses when they become new supervisors, and the hiring goals related to PWD/PWTD are in reference material thereafter, in a course titled "Hiring, Retaining, and Including People with Disabilities," which is required for managers to complete every two years.

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.

GSA maintains a PWDP and various related Affinity Groups, as well as an SES champion to serve as an advocate at the senior level to act as catalyst for change and to provide strategic direction and leverage. GSA intends to continue to engage executive champions by implementing a diversity and inclusion council. The council will focus on GSA’s internal policies and practices, talent recruitment and development, education and training, identifying barriers, building partnerships with rehab agencies, measuring the effectiveness of the diversity initiative process, and ensuring transparency of its operations. Externally, GSA engages with other agencies on PWD-related issues (e.g. use of disability-related hiring authorities, coding, self-identification, use of the Workforce Recruitment Program, etc.).

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 Yes

b. New Hires for Permanent Workforce (PWTD) Answer Yes

PWD and PWTD participation rates among New Hires to the Permanent Workforce are 10.17 percent and 1.19 percent, respectively.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	80976	10.80	0.32	5.39	0.13
% of Qualified Applicants	39767	10.67	0.43	5.33	0.18
% of New Hires	117	8.55	0.85	1.71	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

Series 0301 had Qualification rates of 6.8 and 2.4 percent for PWD and PWTD, respectively, but zero External Selections of either PWD or PWTD. Series 0343 had a Qualification rate of 1.7 percent for PWTD, but zero Selections. Series 0905 had a Qualification rate of 5 percent for PWTD, but zero Selections. Series 1101 had Qualification rates of 11.5 and 6.3 percent for PWD and PWTD,

respectively, but Selection rates were 8 percent and 0 percent for PWD and PWTD, respectively. Series 1102 had Qualification rates of 11 percent and 5.4 percent for PWD and PWTD, respectively, but Selection rates were 9 percent and 0 percent for PWD and PWTD, respectively. Series 1170 had Qualification rates of 10 and 3.4 percent for PWD and PWTD, respectively, but zero External Selections. Series 2210 had Qualification rates of 7.3 and 4.5 percent for PWD and PWTD, respectively, but zero External Selections. Series 1176 was the only MCO without a trigger among New Hires. The highest priority barrier analysis for FY 2020 is low participation of PWD and PWTD among all MCOs.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0301MISC PROGRAM AND ADMINISTRATION	8	175.00	0.00	62.50	0.00
0343MANAGEMENT AND PROGRAM ANALYSTS	6	250.00	16.67	83.33	0.00
0905GENERAL ATTORNEY	9	1355.56	22.22	566.67	0.00
1101GENERAL BUSINESS AND INDUSTRY	27	4151.85	7.41	2292.59	0.00
1102CONTRACTING	4	66275.00	50.00	32675.00	0.00
1170REALTY	306	66.67	0.00	22.22	0.00
1176BUILDING MANAGEMENT	27	240.74	11.11	114.81	7.41
2210INFORMATION TECHNOLOGY SPECIALIST	11	472.73	0.00	290.91	0.00

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

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

Series 0301 had a Relevant Applicant Pool (RAP) of 14.7 percent for PWD but Qualified Internal Applicants were 11 percent PWD. Series 0343 had a RAP of 14.1 percent and 3.2 percent for PWD and PWTD, respectively, but Qualified Internal Applicants were 11.8 percent and 3.1 percent PWD and PWTD, respectively. Series 1101 had a RAP of 12 percent for PWD, but Qualified Internal Applicants were 9.6 percent PWD. Series 1102 had a RAP of 12.4 percent and 2.4 percent for PWD and PWTD, respectively, but Qualified Internal Applicants were 6.1 percent and 2.1 percent PWD and PWTD, respectively. Series 1170 had a RAP of 17.1 percent for PWD, but Qualified Internal Applicants were 12.5 percent PWD. Series 2210 had a RAP of 11.4 percent and 2.2 percent for PWD and PWTD, respectively, but Qualified Internal Applicants were 10 percent and 0 percent PWD and PWTD, respectively.

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

Series 0301 had a Qualification rate of 7.6 percent for PWTD, but Internal Selections were 6.7 percent for PWTD. Series 0343 had a Qualification rate of 12.5 percent for PWD and 3.0 for PWTD, but Internal Selections were 8 percent for PWD and 0 percent for PWTD. Series 1101 had a Qualification rate of 9.6 percent for PWD and 7.6 for PWTD, but Internal Selections were 5.4 percent for PWD and 2.7 percent for PWTD. Series 1102 had a Qualification rate of 6.1 percent for PWD and 2.1 for PWTD, but Internal Selections were 3.9 percent for PWD and 0 percent for PWTD. Series 1170 had a Qualification rate of 18.3 percent for PWD and 8.5 for PWTD, but Internal Selections were 14.3 percent for PWD and 7.1 percent for PWTD. Series 2210 had a Qualification rate of 10 percent for PWD, but zero PWD among Internal Selections.

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 opportunities for career development through seven Competitive Development Programs (CDPs), including a New Leader Program, Executive Potential Program, Executive Leadership Program, Partnership for Public Service – Leadership Excellence in Acquisition Program, Partnership for Public Service – Excellence in Government Fellows Program, Harvard Kennedy School: Senior Executive Fellows Program, and Federal Executive Institute (FEI) Leadership for a Democratic Society. The programs have different eligibility criteria, focus areas, and develop different competencies, up to and including Senior Executive Service candidate development. In FY20, analysis was limited to CDP eligibility, nominations/applications, and separations. In FY21, GSA plans to expand capture of data to include details, mentoring, internships, and other non-CDP programs, to facilitate analyses of usage and potential barriers. Preliminary analysis showed lower than expected participation and anecdotal information suggests that opportunities are mostly offered as nominations from supervisors or managers, rather than through unsolicited applications from employees. This suggests that there are opportunities for multiple approaches to increasing both nominations, through education of supervisors and managers, and applications, through improved outreach and communications. Additionally, it is planned that future analyses will consider subcomponent data, to identify participation characteristics of de-centralized opportunities. That approach will be more difficult, as program statistics may not be readily available and/or may be more difficult to compile; however, that data will likely be more expansive than the relatively limited set of nominations and selections to the CDPs, and provide information that is more apt to guide corrective measures to improve advancement of PWD.

B. CAREER DEVELOPMENT OPPORTUNITES

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

GSA provides opportunities for career development through many different programs. The GSA Learning and Development Council develops annual slates of Competitive Development Programs (CDPs), of which the Fiscal Year 2020 slate included seven agency-level CDPs: (1) New Leader Program, (2) Executive Potential Program, (3) Executive Leadership Program, (4) Partnership for Public Service – Leadership Excellence in Acquisition Program, (5) Partnership for Public Service – Excellence in Government Fellows Program, (6) Harvard Kennedy School Senior Executive Fellows Program, and (7) Federal Executive Institute (FEI) Leadership for a Democratic Society. The programs have different eligibility criteria, focus areas, and develop different competencies, up to and including Senior Executive Service candidate development. In addition to the agency-level CDPs, GSA also maintains the following other offerings: (1) GSA Start Program; (2) Targeted Leadership Development Program; (3) Mentoring Program; (4) Coaching services; and (5) Enterprise Emerging Leaders Program. In October, 2021, GSA is also launching a Mid-Career Leadership Development (Pilot) Program. GSA’s Mentoring Program establishes professional relationships in which an experienced person (the mentor) supports and encourages employees to develop specific skills and knowledge that will maximize their business potential and improve their performance. The program includes a Resource Library, virtual training through GSA’s Online University, self-assessments, tips, templates, and videos. In addition to managing the agency-level program, the Mentoring

Program also helps subordinate organizations to create Mentoring Pilots, connects employees with Regional Mentoring Programs, and provides Mentoring Essentials training for new employees. Additionally, GSA’s Phased Retirement Guidelines and Procedures (HRM 9900.1) contains a requirement for a phased retiree to spend at least 20 percent of his/her working hours mentoring. GSA Coaching is a confidential, voluntary service available to all employees within GSA, intended to maximize potential and enhance personal and professional effectiveness. GSA offers three primary types of coaching, including: (1) Individual Coaching - Traditional coaching designed to occur over multiple sessions, set up through a standard coaching agreement; (2) Situational Coaching - A targeted approach (usually 1 or 2 sessions) available to senior leaders or executives when coaching related to a specific situation or decision is desired; and (3) Group (or Team) Coaching - When two or more people are working together to solve a problem or deal with related issues or concerns. Group coaching is different than facilitation and is often related to interpersonal or team dynamics. GSA Coaching is a service, rather than a program, and requires neither competition nor supervisory approval to participate. During FY20, a total of 87 GSA employees (GS7 thru SES) utilized centrally-managed coaching services through one of three available avenues for coaching: (1) internal/trained GSA coaches; (2) the Federal Coach Network database; or (3) coaching services that are offered (for GS14 thru SES) by the Treasury Executive Institute (TEI). Additional coaching also takes place, beyond the centrally-coordinated services, through subcomponent efforts. Use statistics for subcomponent services is not reported centrally or included in the data. 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 Enterprise Emerging Leaders Program 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); Leading Organizations – Manager (GS14-GS15); Leading Strategy – Executive (SES); and (5) Fundamental Programs (all GSA employees).

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Other Career Development Programs	161	71	13	2	1	0
Training Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0

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

Looking collectively at the seven CDPs, Non-PWD participated in overall Applications at a rate of 0.53 percent, compared to a rate of 0.45 percent for PWD. Benchmarking against the Applicant pools, Non-PWD participation in Selections was 44 percent, compared to 15 percent for PWD.

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

Looking collectively at the seven CDPs, Non-PWD participated in overall Applications at a rate of 0.53 percent, compared to a rate of 0.21 percent for PWTD. Benchmarking against the Applicant pools, Non-PWD participation in Selections was 44 percent, compared to zero (0) Selections of PWTD.

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

Within Time-Off Awards, there are triggers for PWD in all award-levels, except for awards of between 31 to 40 hours. For PWTD, there are triggers in the three lowest award levels (1-10 hours, 11-20 hours, and 21-30 hours), but not for awards of 31 hours or more. For Time-Off Awards between 1-10 hours, the Inclusion Rate IR) for People Without Disabilities (IR PWoD) is 6.9 percent, compared to 6.2 percent for PWD and 6.1 percent for PWTD. For Time-Off Awards of 11-20 hours, the IR PWoD is 2.8 percent, compared to 2.5 percent for PWD and 1.7 percent for PWTD. For Time-Off Awards of 21-30 hours, the IR PWoD is 0.5 percent, compared to 0.2 percent for PWD and 0 percent for PWTD. For Time-Off Awards over 40 hours, the IR PWoD is 5 percent, compared to 4.3 for PWD.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	743	6.22	6.70	6.06	6.26

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 Hours: Total Hours	4686	34.70	43.12	33.77	34.91
Time-Off Awards 1 - 10 Hours: Average Hours	6.31	0.46	0.07	2.41	0.00
Time-Off Awards 11 - 20 hours: Awards Given	304	2.54	2.75	1.73	2.72
Time-Off Awards 11 - 20 Hours: Total Hours	4999	40.59	45.50	28.57	43.39
Time-Off Awards 11 - 20 Hours: Average Hours	16.44	1.31	0.17	7.14	-0.05
Time-Off Awards 21 - 30 hours: Awards Given	55	0.25	0.49	0.00	0.30
Time-Off Awards 21 - 30 Hours: Total Hours	1354	5.89	12.09	0.00	7.27
Time-Off Awards 21 - 30 Hours: Average Hours	24.62	1.96	0.26	0.00	2.42
Time-Off Awards 31 - 40 hours: Awards Given	1099	11.54	9.68	13.42	11.10
Time-Off Awards 31 - 40 Hours: Total Hours	34159	357.77	300.91	416.02	344.20
Time-Off Awards 31 - 40 Hours: Average Hours	31.08	2.54	0.32	13.42	0.00
Time-Off Awards 41 or more Hours: Awards Given	542	4.26	4.98	5.63	3.94
Time-Off Awards 41 or more Hours: Total Hours	28218	221.28	259.56	292.64	204.64
Time-Off Awards 41 or more Hours: Average Hours	52.06	4.26	0.54	22.51	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	322	3.36	2.76	5.63	2.83
Cash Awards: \$501 - \$999: Total Amount	258735.25	2788.81	2202.21	4817.32	2315.97
Cash Awards: \$501 - \$999: Average Amount	803.53	68.02	8.31	370.56	-2.50
Cash Awards: \$1000 - \$1999: Awards Given	3779	32.90	34.16	32.90	32.90
Cash Awards: \$1000 - \$1999: Total Amount	5815622.31	48438.82	52905.79	46977.49	48779.45
Cash Awards: \$1000 - \$1999: Average Amount	1538.93	120.49	16.15	618.13	4.50
Cash Awards: \$2000 - \$2999: Awards Given	2211	15.22	20.44	10.82	16.25
Cash Awards: \$2000 - \$2999: Total Amount	5452447.33	37305.24	50462.95	26167.53	39901.41
Cash Awards: \$2000 - \$2999: Average Amount	2466.05	200.57	25.75	1046.70	3.33
Cash Awards: \$3000 - \$3999: Awards Given	1064	5.65	10.15	5.19	5.75
Cash Awards: \$3000 - \$3999: Total Amount	3645070.39	19147.38	34790.71	17930.30	19431.08
Cash Awards: \$3000 - \$3999: Average Amount	3425.82	277.50	35.76	1494.19	-6.11
Cash Awards: \$4000 - \$4999: Awards Given	254	0.98	2.49	0.87	1.01

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$4000 - \$4999: Total Amount	1048247	4052.45	10285.53	3603.46	4157.11
Cash Awards: \$4000 - \$4999: Average Amount	4126.96	337.70	43.04	1801.73	-3.56
Cash Awards: \$5000 or more: Awards Given	11	0.00	0.11	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	76158	0.00	794.14	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	6923.45	0.00	72.19	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

The IR PwOD was 1.05 percent; however, the Inclusion Rates for PWD and PWTD were 0.71 percent and 0.82 percent, respectively.

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 employee recognition programs was not available at the time that the FY20 EEO Program Status Report was drafted.

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 Yes
 - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No

- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes

For SES, the Relevant Applicant Pool was 5.9 percent for PWD; however, no Internal Applications, Qualifications, or Selections included PWD. For GS14, the Relevant Applicant Pool was 8.8 percent for PWD; however, the Qualification rate for PWD was 6.7 percent and the Selection rate was 3.9 percent. For GS13, the Relevant Applicant Pool was 14.6 percent for PWD; however, the Qualification rate for PWD was 12.1 percent and the Selection rate was 6.4 percent.

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

For SES, the Relevant Applicant Pool was 1.3 percent for PWTD; however, no Internal Applications, Qualifications, or Selections included PWTD. For GS14, the Qualification rate for PWTD was 4.3 percent; however, the Selection rate was 0 percent. For GS13, the Qualification rate for PWTD was 5.8 percent; however, the Selection rate was 2.6 percent.

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

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

- c. New Hires to GS-14 (PWD) Answer Yes
- d. New Hires to GS-13 (PWD) Answer Yes

For SES, the Qualified Applicant Pool was 8.1 percent for PWD; however, no External Selections included PWD. For GS15, the Qualified Applicant Pool was 10.8 percent for PWD; however, no External Selections included PWD. For GS14, the Qualified Applicant Pool was 10.9 percent for PWD; however, the Selection rate was 6.9 percent. For GS13, the Qualified Applicant Pool was 11.5 percent for PWD; however, the Selection rate was 10 percent.

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

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

For SES, the Qualified Applicant Pool was 3.3 percent for PWTD; however, no External Selections included PWTD. For GS15, the Qualified Applicant Pool was 4.9 percent for PWTD; however, no External Selections included PWTD. For GS14, the Qualified Applicant Pool was 4.9 percent for PWTD; however, the Selection rate was 4.2 percent. For GS13, the Qualified Applicant Pool was 5.2 percent for PWTD; however, the Selection rate was 3.9 percent.

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

At the time that the FY20 Agency EEO Program Status Report was developed, no data was available relating to Internal Competitive Promotions to Manager or Executive Management Positions. The AEPM will collaborate with the Human Capital Analytics Branch Analytics and Strategy Division to develop the missing data in time to support the FY21 reporting cycle. For Supervisors, the rate of PWTD among Qualified Internal Applicants was 7 percent; however, the rate of PWTD Selections was only 3.9 percent.

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 N/A
- ii. Internal Selections (PWTB) Answer N/A

b. Managers

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

c. Supervisors

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

At the time that the FY20 Agency EEO Program Status Report was developed, no data was available relating to Internal Competitive Promotions to Manager or Executive Management Positions. The Affirmative Employment Program Manager will collaborate with Human Capital Analytics Branch Analytics and Strategy Division to develop the missing data in time to support the FY21 reporting cycle. For Supervisors, the rate of PWTB among Qualified Internal Applicants was 3.9 percent; however, the rate of PWTB Selections was only 2 percent.

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, the Qualified pool was 8.1 percent PWD; however, no PWD were among the Selections. For Managers, the Qualified pool was 8.6 percent PWD; however, no PWD were among the Selections. For Supervisors, the Qualified pool was 13.8 percent PWD; however, the PWD Selection rate was only 7 percent.

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 Yes
- b. New Hires for Managers (PWTB) Answer Yes
- c. New Hires for Supervisors (PWTB) Answer Yes

For Executives, the Qualified pool was 2.4 percent PWTB; however, no PWTB were among the Selections. For Managers, the Qualified pool was 3.3 percent PWTB; however, no PWTB were among the Selections. For Supervisors, the Qualified pool was 5.6 percent PWD; however, the PWD Selection rate was only 4.7 percent.

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

At the time this Part J was drafted, the agency did not have statistics available regarding conversions of Schedule A(u) employees. The AEPM is collaborating with the Human Capital Analytics Branch Analytics and Strategy Division to develop the missing data in time to support the FY21 reporting cycle. Additionally, the data will be used to support associated barrier analyses and agency efforts to supplement self-identified disability status data with data on appointments using hiring authorities that take disability into account.

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 5.1 percent; however, PWD had an inclusion rate of 5.8 percent. Among Involuntary Separations, PWoD had an IR of 0.11 percent; however, PWD had an IR of 0.41 percent.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	16	0.40	0.11
Permanent Workforce: Resignation	172	1.42	1.50
Permanent Workforce: Retirement	352	3.48	2.99
Permanent Workforce: Other Separations	56	0.71	0.46
Permanent Workforce: Total Separations	596	6.01	5.06

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

a. Voluntary Separations (PWTD) Answer No

b. Involuntary Separations (PWTD) Answer Yes

Among Involuntary Separations, PWoD had an IR of 0.11 percent; however, PWTD had an IR of 1.3 percent.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	16	1.23	0.11
Permanent Workforce: Resignation	172	0.82	1.50

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Retirement	352	2.47	3.06
Permanent Workforce: Other Separations	56	0.41	0.49
Permanent Workforce: Total Separations	596	4.94	5.17

- 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.

Analyses of the FY20 Statistical Report of Discrimination Complaints data and data on requests for reasonable accommodations were inconclusive. During FY20, the GSA Exit Survey lacked questions that would help explain why PWD and/or PWTD left the agency, and Exit Interviews were not conducted. OCR is collaborating with OHRM to expand the scope of the exit survey to include relevant questions pertaining to hiring, advancement, and retention of PWD and PWTD.

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.

The address <https://www.gsa.gov/policy-regulations/policy/information-integrity-and-access/it-accessibilitysection-508> contains information on rights associated with Section 508 of the Rehabilitation Act; however, the site does not include information on how to file a related complaint.

- 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.

<https://www.gsa.gov/real-estate/design-construction/accessible-facility-design>; however, the site does not include information on how to file a related complaint.

- 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's Office of Administrative Services (OAS) provides the Center for IT Access (CITA), a centrally funded program that provides Assistive Technology Needs Assessments and expertise for all employees with disabilities as well as their management. CITA also maintained an inter-agency agreement with the Department of Defense's (DoD) Computer Accommodation Program (CAP), which provided many kinds of assistive technology and related training. In addition, centralized funds are provided by the OAS to cover the same items when CAP was unable to do so. Note: Effective October 1, 2020 (FY21) CAP no longer provides funding to procure or provide Assistive Technology (AT) and AT devices to Non-DoD agencies; however CAP continues to conduct assessments, provides information and referrals, and assists Non-DoD agencies in determining the appropriate AT and AT devices to purchase by their agency. OAS also provides workplace modifications, when needed, from a centralized budget. There is no central funding for interpreters or Communication Access Realtime Translation (CART) services at this time; however, OCR is exploring establishment of an agency-level central fund . OCR’s External Programs Branch will partner with the Public Buildings Service to develop a system to assess GSA-owned, managed and leased space for accessibility purposes, pursuant to applicable Federal civil rights laws. Development of this system will allow building management staffs to assess their respective buildings to ensure accessibility to PWD.

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.)

A total of 161 requests for accommodation were processed (or were being processed) at the end of FY20. Of those requests, 103 were timely processed, and the average processing time was approximately 37 days. Approved requests and requests that were approved with modifications both took an average of 28 days; however, requests that were denied took an average of 60 days. All figures reflect total Days in Process, minus time between when medical documentation was requested and when medical documentation was received.

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.

GSA's Policy and Procedures for Providing Reasonable Accommodation for Individuals with Disabilities (GSA Order HRM 2300.1 of June 6, 2018) was updated on January 14, 2021 to incorporate feedback received from the EEOC and to address reductions to the DoD CAP after FY20. The changes enhance communications between reasonable accommodation requesters and Local Reasonable Accommodations Coordinators (LRACs), clarify the calculation of Days in Process when medical documentation has been requested, and seek to improve the speed with which reasonable accommodations are made. Analysis of reasonable accommodations data for FY20 identified possible issues with the data system and/or the procedures used to populate the data system. These issues, along with the untimely processing of roughly 36 percent of requests and an increase in complaints related to reasonable accommodations resulted in greater collaboration between OCR and OHRM, in order to analyze the situation and to identify and eliminate or mitigate the root causes. At the time of the drafting of the EEO Program Status Report, those efforts were ongoing. Furthermore, an Employee Relations Program Manager is planned to be in place by July, 2021 to oversee the associated Human Resources Management (HRM) Case Management System, which houses the reasonable accommodations data. Lastly, it is notable that GSA maintains two separate reasonable accommodations programs, one which covers the whole agency, with the exception of the Office of the Inspector General (OIG), and a separate OIG accommodation program. To date, data from the OIG program has not been included in the agency report or analyzed as part of its ongoing program of barrier investigation. The AEPM and OHRM are collaborating to identify relevant points of contact and establish mechanisms for capturing, maintaining, analyzing, and reporting relevant information.

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.

The PAS requirement is understood by the cohort of LRACs. Additionally, OHRM coordinated with a program analyst from OCR to obtain a sample job description/Position Description from another agency (one that has provided PAS before it was required) as an example of a PAS-related Administrative Assistant/contact person to use at GSA, should the need arise. GSA has had no requests for PAS.

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.

Three settlements for three cases; one case had disability as its only basis; two cases had disability as one basis of multiple claimed.

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.

One settlement for one case; disability was one basis of five claimed; complaint is one of the complaints from above with harassment allegation.

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 No

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

Answer N/A

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

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

While no barriers have yet been identified, PWD and PWTD-related triggers are the single highest priority of the five trigger areas being investigated in FY21 (four of which are identified in Part I). The PWD/PWTD triggers related to low participation of PWD and PWTD in all MCOs are described in Part J. One overarching factor that impacts the ability of the agency to conduct effective barrier analyses of PWD and PWTD is the accuracy of its disability status data.

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

While no barriers have yet been identified, PWD and PWTD-related triggers are the single highest priority of the five trigger areas being investigated in FY21 (four of which are identified in Part I). The PWD/PWTD triggers related to low participation of PWD and PWTD in all MCOs are described in Part J.

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.

N/A