EXECUTIVE SUMMARY

The mission of the U.S. General Services Administration (GSA) is to deliver the best customer experience and value in real estate, acquisition, and technology services to the government and the American people. GSA leverages the buying power of the Federal Government to provide federal purchasers with cost-effective, high-quality products and services from commercial vendors. GSA has two major buying Services that manage large-scale acquisition programs for use by federal customers: the Federal Acquisition Service (FAS) and the Public Buildings Service (PBS). Housed within FAS is the Technology Transformation Services (TTS). In addition to FAS and PBS, the Office of Customer Experience (OCE), the Office of Government-wide Policy (OGP), and the Office of Small and Disadvantaged Business Utilization (OSDBU) all play an integral role in influencing interagency best practices for driving meaningful and durable positive change. GSA delivers mission-critical services and products to federal agency customers and clients, which makes the agency uniquely positioned to have a multiplier effect across government in advancing equity and removing barriers for underserved communities.

GSA conducted equity assessments and identified a set of actions for three high-impact focus areas: federal procurement, federal buildings footprint, and federal technology design & delivery.

Advancing Equity and Supplier Diversity in Federal Procurement

Small Disadvantaged Businesses (SDBs) are disproportionately vulnerable to compounding obstacles and negative impacts while competing for Federal Government contracts and obligations—including the approximately $75 billion in annual contracts overseen by GSA. The complex web of challenges facing SDBs impedes their success and ultimately exacerbates systemic economic disparities in the federal marketplace. GSA's plan to advance equity in federal procurement coordinates five actions for a holistic approach to reduce barriers and improve SDB outcomes at critical stages of the federal contracting lifecycle, with the goal to increase overall contract dollars awarded to underserved and disadvantaged communities.

Advancing Equity and Diversity Through the Public Buildings Footprint

GSA is responsible for a nationwide real estate portfolio of more than 370 million rentable square feet. With its vast physical footprint, GSA is committed to taking actions that help it better track its impact, support economic recovery, strengthen stakeholder engagement, advance equity and diversity in the real estate and construction industries, and improve community and customer experiences with federal facilities across America.

Advancing Equity and Accessibility in Federal Technology

Inequities in technology design and delivery disproportionately harm those from historically and socially marginalized communities. This means that those who most need government services will often have the most difficulty accessing them. GSA's top governmentwide technology services and solutions each serve millions of end users annually. We are dedicated to actions that prioritize equitable user experience as a core design principle, mitigate algorithmic bias, improve digital accessibility, and modernize the delivery of government services to the American people.

SUMMARY OF EARLY ACCOMPLISHMENTS

GSA has had several achievements and successes since the release of Executive Order 13985 on January 20, 2021. These achievements are across three high-impact program areas: Acquisition, Public Buildings, and Technology Transformation.

<u>**Acquisition**</u>
- The Governmentwide Category Management Project Management Office hosted a Fall Industry Day targeted at the small business (SB) and the small disadvantaged business (SDB) community. The session helped SBs and SDBs navigate the federal marketplace. Almost 1,200 attended the live event or viewed it on demand.
- GSA's OSDBU hosted a virtual, full-day training and matchmaking event, focused on helping SBs achieve success in the federal marketplace. More than 800 federal leaders and industry experts participated.
- GSA's OSDBU hosted 11 virtual events connecting 80 Small Disadvantaged and Veteran-Owned Small Business (VOSB) with an estimated 40 GSA prime contractors to meet, network, and discuss potential subcontracting opportunities.

<u>**Public Buildings**</u>
- The Office of Federal High-Performance Green Buildings, an office within OGP, established the Green Building Advisory Committee (GBAC) under the Federal Advisory Committee Act. The GBAC's Environmental Justice and Equity Task Group garnered feedback from community groups and advocacy organizations and presented recommendations to GBAC as it evaluates the public building portfolio's impacts.
- PBS is partnering with the National Endowment for the Arts to increase the diversity and outreach of its Art in Architecture program.
- PBS facilitated an "IDEA" (DEIA) Roundtable with associations and industry partners. The Industry Roundtable focused on diversity and inclusion topics and highlighted such topics as the Architectural Barriers Act in the federal built environment.
- PBS continues to maintain the Good Neighbor Program, which provides technical planning expertise to GSA project teams, to improve collaboration with rural and urban communities nationwide regarding GSA projects and properties.

<u>**Technology Transformation**</u>
- Login.gov partnered with Source America and Knowability to recruit low-vision and blind users for insight on accessibility issues on the platform. Login.gov commissioned a field test to assess the efficacy of liveness detection systems in identity-proofing processes. Revisions to Login.gov have been made to improve access and disparities.
- TTS has adopted formal acceptance criteria and implemented automated testing to promote accessibility. Our continuous-integration test suite automatically detects known accessibility defects so that they can be addressed before product launches. This equity intervention improves accessibility to government digital services for individuals with visual impairments.

EQUITY ACTION PLAN

Advancing Equity & Supplier Diversity in Federal Procurement

A. GSA identified the following five barriers to equitable outcomes for Small Disadvantaged Businesses:

(1) New information technology businesses are deterred from entering the federal market due to the complexity of navigating and complying with federal procurement requirements. This barrier creates challenges for SDBs pursuing Governmentwide Acquisition Contracts (GWAC) that federal agencies mainly use for acquiring information technology (IT)-related services. **(2)** SDBs experience difficulty navigating the Multiple Award Schedule (MAS) procurement award process and understanding regulatory requirements due to a lack of knowledge of the federal procurement landscape and resources to learn the process -- leading to missed opportunities. **(3)** For SDBs to be successful post-award, they must win task or delivery orders, satisfy the customer, and comply with the contractual requirements. Most small business owners find it challenging to secure trained personnel who can competently address all of these areas, especially adhering to contractual requirements and regulations. **(4)** GSA found in its Federal Supply Schedule, GWAC and Multi-agency contracts (MAC) that SDBs were not always successful in winning task or delivery orders. While the Federal Supply Schedule is continuously open, the absence of regular on-ramping for new SDBs in other governmentwide MACs may deny firms the opportunity to compete for several years. **(5)** SDBs have difficulty determining potential federal opportunities because there is no centralized portal for this information; instead, they must search multiple agency sites.

Reasons for Prioritizing Aforementioned Barriers: GSA compared its spending breakdown to the Federal Government as a whole and found that a significantly higher percentage of GSA-funded obligations went to underserved communities when compared to governmentwide obligations. GSA concluded it could best support advancing equity within federal contracting vehicles by reducing the barriers to obtaining a GSA contract and increasing the opportunity for success once SDBs obtain contracts.

Discussion of Evidence: GSA analyzed small business and SDB contracting trends within the GSA Schedule Program and GWACs using Federal Procurement Data System, Sales Reporting Portal, and SAM.gov data to show where socioeconomic groups performed well or underperformed. The assessment provided a baseline of current GSA performance in key SDB measures and is helping to prioritize opportunities to improve SDB contracting performance. For example, the data showed: 1) SDBs account for 32% of Alliant 2 SB vendors; this supports the strategy for Polaris' SDB Pools[1]. 2) Analysis of MAS awards revealed a relatively lower success

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[1] Alliant 2, a Best-in-Class GWAC that is a preferred governmentwide solution, offers artificial intelligence, distributed

rate in SDBs winning awards as compared to other SBs. From fiscal year (FY) 2018 - FY 2020, the number of SDB vendors with no obligations has remained consistent, averaging 50%. 3) Between FY 2019-FY 2020, 63% of SDBs on the Schedule program have won awards; however, the top 15% of SDBs received 80% of the total SDB obligations in MAS.

B. GSA plans the following five actions to address the identified barriers:

(1) Establish new GWACs, 8(a) STARS III and Polaris, to increase SDB representation[2]. **(2)** Simplify the process for firms to obtain a MAS contract and improve vendor education (for the offer process) using human-centered design principles to create a pathway to federal procurement through the MAS contract vehicle. The MAS program contains unique features that often makes it the entry point to government procurement. SDB access to MAS enables them to become part of the government marketplace and participate in additional opportunities for government procurement. As companies grow more proficient and experienced in using MAS, they can prepare to compete for contract vehicles with more complex buying regulations. **(3)** Establish a robust post-award engagement strategy to help SDBs be successful in achieving sales through their contracts. **(4)** Establish a supplier diversity plan that promotes successful outcomes for vendors, including the strategy and criteria for regular on-ramping relative to GWACs and MACs. Planned on-ramping of new SDBs will enable GSA to make procurement opportunities available on a regularly scheduled basis to all eligible providers of goods and services. **(5)** Expand the Forecast of Contracting Opportunities Tool. GSA will improve this tool to make it easier for SDBs to evaluate federal marketplace opportunities to assist them in achieving contract sales. Further, this tool directly reduces the burden on SDBs in locating opportunities by simplifying the process to work with the Federal Government and potentially decreasing their overhead costs.

C. GSA intends to track progress through a mix of short-, mid-, and long-term goals for each of the five identified actions:

(1) Awarding the new GWACs, 8(a) STARS III and Polaris: The short-term goals are to award all remaining 8(a) STARS III cohorts and Polaris SB and Women-Owned SB pools in 2022, thus expanding SDB participation opportunities, conduct outreach to agencies on the benefits of using 8(a) STARS III and Polaris, and develop a robust post-award engagement strategy to help SDBs be successful. Long-term goals are to assess the opportunity and feasibility of new socio-economic pools on Polaris and complete regular reviews of the program to determine the timing of on-ramps to infuse new capabilities onto the GWAC. **(2)** Simplifying the MAS solicitation process and

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ledger technology, robotic process automation, and other types of emerging technologies. It provides best-value IT solutions to federal agencies, while strengthening chances in federal contracting for small businesses through subcontracting. Polaris is an IT GWAC. GSA is currently developing the Polaris GWAC.

[2] The Best-in-Class 8(a) STARS III GWAC is a small business set-aside contract that provides flexible access to customized IT solutions from a large, diverse pool of 8(a) industry partners

improving vendor education: The short-term goals are to update the MAS Roadmap to simplify processes, launch the updated Vendor Support Center and baseline the saturation of SDBs in the MAS program by socio-economic category. Long-term goals are to reduce the complexity level of the MAS award process and increase the saturation of SDBs in the MAS program by socio-economic category and by industry. **(3)** Establishing a robust post-award engagement strategy: The short-term goals are for GSA to select a post-award engagement program manager, develop an enterprise-wide integrated project team, perform research on current activities, and develop a plan for expected enterprise-wide efforts. The plan will include establishing roles and responsibilities, developing efficiencies, and defining measurable outcomes to determine success. **(4)** Establishing a supplier diversity plan: Mid-term goals include increasing the number of contracts and subcontracts awarded to SDBs, thereby increasing the percentage of governmentwide contract dollars to this underserved community. Long-term goals include establishing advanced guidelines that promote support for supplier diversity by creating effective on-ramping acquisition criteria for qualified SDBs. **(5)** Enhancing the Forecast of Contracting Opportunities Tool: GSA established a short-term goal of onboarding two agencies in FY 2022 with the ultimate long-term goal of onboarding all 24 Chief Financial Officer Act agencies.

Outcomes: GSA's strategies and actions will lead to a more equitable federal procurement system by reducing barriers to entry and improving access to the federal marketplace for SDBs. The benefit is that more federal contracting dollars will be available to this underserved community. Activities under this Plan will be reviewed on a regular basis to ensure year over year goals and objectives are met. This Plan supports the Administration's overall objective of increasing SDB spend by 50% over the next 5 years. GSA action items should yield the following measurable outcomes: increased number of SDBs with GSA contracts to bolster governmentwide spend and increased sales for a diverse group of SDBs to mitigate the risk of a small number of firms receiving the majority of sales.

D. GSA will use the following strategies to maintain accountability for the five action items:

(1) Develop agency engagement strategies, develop the post-award industry engagement strategy and track customer loyalty scores and industry satisfaction scores on 8(a) STARS III and Polaris. Both measures will be included in the FAS Senior Leadership Performance Plans. **(2)** This action aligns with the strategic plan for GSA and FAS. Progress, including updates on the MAS Roadmap, will be communicated through the Annual Performance Plan, FAS town halls, Interact publications, and speaking engagements. **(3)** GSA will select a post-award Engagement Strategy Program Manager to develop and lead the execution of the post-award Engagement Strategy Plan, facilitating its approval by all relevant GSA stakeholders. **(4)** Draft and publish a diversity plan that aligns with GSA's strategic plan and provide regular reporting of comparable metrics. **(5)** GSA commits to onboarding at least two agencies to the Tool this fiscal year and continues to offer demonstrations to agencies that would like to learn more about the benefits of onboarding to the

Forecast of Contracting Opportunities Tool. In addition, GSA has committed funds to make enhancements for a more user-friendly interface for vendors and agencies. Annually, GSA will obtain feedback from the vendor community and the federal acquisition workforce on the Forecast of Contracting Opportunities Tool to increase its robustness and relevance.

Advancing Equity and Diversity Through the Public Buildings Footprint

A. GSA has identified two potential barriers to equity in the public buildings footprint:

(1) Evidence Capacity. First, GSA has evidence gaps that impede its ability to fully assess the community impact of its real estate portfolio. Urban area planning consideration is specified in the *Facilities Standards for the Public Buildings Service* (PBS-P100) and those community considerations are included in the actual design packages. When we attempted to assess the degree to which inequities exist in the public buildings footprint, we identified evidence gaps (*e.g.*, economical and environmental justice evidence) that could assist GSA with conducting a robust community impact assessment. Disrupting structural and systemic inequities requires quality and complete evidence,[3] which GSA currently does not possess. **(2)** Stakeholder Engagements. Next, while GSA regularly engages critical stakeholders when acquiring, developing and disposing of property, GSA believes there are opportunities to increase and strengthen engagements with key stakeholders. To that end, GSA is committed to examining recent and past projects to determine where there are opportunities to have a more robust stakeholder engagement. GSA will use the information from this assessment to inform a stakeholder engagement and outreach strategy that is in development.

Impacted policies and programs. Although GSA has not identified any particular policies or programs that create these barriers, addressing these barriers will impact key GSA strategies and processes, such as the Learning Agenda and Annual Evaluation Plan.

Impacted communities. These barriers impact many of the historically, socially, and economically underserved communities where federal facilities are located.

Evidence of the impact. During GSA's attempt to build a robust model to conduct community impact assessments, which would help GSA determine the extent to which barriers exist, GSA identified two key evidence gaps (*e.g.*, economical and environmental justice evidence) that hindered its ability to develop the model, and subsequently, conduct a robust assessment. Having access to relevant community data would enable GSA to develop this model and conduct a reliable community impact assessment. With this assessment, GSA's Good Neighbor Program would then be in a position to have targeted engagements with Federal, State, local, Tribal, and private sector partners that would enable PBS to improve its development and disposition programs.

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[3] Urban Institute, *Principles of Evidence-based Policymaking*, dated September 2016

B. GSA will take a multi-year, multi-prong approach to addressing the barriers identified in this Action Plan. Within 6, 12, 18, and 24 months, GSA will take the following steps to strengthen its evidence capacity, which will enable GSA to develop a robust community impact model:

(1) Finalize an evidence needs assessment. GSA is conducting an evidence needs assessment to determine what, in addition to economical and environmental justice evidence, is needed to develop a model that will be used to conduct a robust community impact assessment; **(2)** Identify, recruit, and hire a full-time Data Scientist. In addition to identifying evidence gaps, GSA has identified human resource gaps, namely in data science. Therefore, together with the GSA Office of Human Resource Management and the Office of Evaluation Science, PBS will identify opportunities to leverage Office of Personnel Management's newly established Data Science Occupational Series to hire a full-time Data Scientist; **(3)** Form evidence-sharing partnerships with Federal agencies. PBS will partner with GSA's Office of Evaluation Sciences to identify and establish evidence-sharing agreements with agencies that either have on hand or plan to collect community data that could be used by GSA; **(4)** Develop a Community Impact Model. Once community evidence has been collected, structured, and analyzed, PBS will develop a robust community impact model that enables GSA to: (i) fully understand the extent to which barriers exist in the public buildings footprint; (ii) identify historical trends and benchmarks; and **(iii)** identify opportunities to target partnership and engagements at the Federal, State, local, Tribal, and private sector levels; **(5)** Coordinate Federal Investments within Communities. Within the next 6-24 months, GSA will seek to partner with other landholding federal agencies and federal granting authorities to identify opportunities to maximize planned investments and create shared goals, objectives, and metrics to reduce or eliminate the barriers created on communities that host federal facilities; **(6)** Strengthen the community planning workforce. GSA is bringing increased focus to community engagements by elevating and expanding its Good Neighbor Program. To that end, GSA will explore opportunities to increase the number of full-time urban planning and design resources that will support the Good Neighbor Program. This investment will enable the Good Neighbor Program to deliver tangible benefits to communities by implementing this stakeholder engagement and outreach strategy, increasing urban planning technical assistance and landscape architecture programming, and conducting Planning and Outreach Partnership meetings; and **(7)** Strengthen engagement with State, Local and Tribal stakeholders. GSA will engage key groups that represent State, local, and Tribal communities to identify opportunities to reduce or eliminate equity barriers. GSA will target key stakeholder groups such as: National Governors Association, National League of Cities, National Congress of American Indians, U.S. Conference of Mayors, International City/County Management Association, and Local Governments for Sustainability.

Reasoning for priorities: GSA selected these actions because they offer low cost opportunities that could yield maximum impact and result in meaningful reduction of barriers. Additionally, these actions demonstrate a commitment to advancing DEIA in GSA's development and disposition practices. Collectively, these actions will provide GSA the capacity to make measurable and sustainable improvements to significantly reduce barriers in the public buildings footprint. Additionally, these actions will greatly improve GSA's decision-making practices and processes by capturing the diverse views of the communities or those groups that represent the communities.

C. GSA will use several methods to track progress and hold itself accountable to the commitments made in this Plan, including:

(1) Assigning a lead Senior Executive Service (SES) member to oversee GSA's DEIA activity on behalf of the PBS Commissioner; **(2)** establishing a PBS DEIA Executive Council to advise the PBS Commissioner on opportunities to advance DEIA as outlined in various executive orders; **(3)** leveraging SES performance plans to establish critical elements and performance plan targets for PBS's 11 Regional Commissioners and 7 Assistant Commissioners; and **(4)** developing and deploying dashboards and tracking tools to assess progress in meeting the commitments outlined in this Plan.

Advancing Equity and Accessibility in Federal Technology

A. GSA identified two high-priority barriers that historically and socially disadvantaged users face when accessing digital services for government programs and benefits:

(1) Digital services very often fail to prioritize universal design and usability beyond compliance. Many government applications and websites lack sufficient support to meet adequate accessibility standards and assistive technologies. Users who are disproportionately affected are those with visual, mobility, and cognitive impairments. About 3% of Americans are visually disabled (*i.e.*, color-blind, low-vision, or blind) according to the 2016 American Community Survey. Often government applications and websites have minimal language accessibility, confusing navigation, and poor design practices resulting in user mistrust and frustration. Instances where user experiences have been disappointing or subpar have been attributed to high user stress resulting in reduced reading comprehension, navigation problems, and incomplete tasks. As an example discovered through usability testing, Login.gov learned that individuals who use screen readers predominantly use software known as "Job Access With Speech" or "JAWS." Yet, despite the fact that they use the same software, these users also tend to use the JAWS native software rather than relying on the browser and these users typically configure their setups to best enable them to navigate websites. As such, many users rely on keyboard shortcuts instead of "mousing over" web elements and have different user flows from those who do not rely on screen readers. **(2)** Algorithmic discrimination in adoption of facial matching, machine learning, and other emerging technologies. Widely adopted biometric-detection systems used to verify identity for access to government services often have disproportionately high false rejection rates for African Americans and other people of color because facial recognition and other machine learning technologies are trained on biased, non-exhaustive datasets. Furthermore, through our own testing, GSA learned that major commercial implementations of facial matching had disproportionately high "False Rejection Rates" for African Americans. This finding is consistent with research by the National Institute of Science and Technology[4] as well as academic literature. The end users most overburdened by systemic gaps in data collection processes and digital privacy are largely also the most vulnerable Americans who need to be able to rely on equitable access to government digital services, programs, information, and benefits.

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[4] Face Recognition Vendor Test (FRVT) Part 3: Demographic Effects, NISTIR 8280

B. GSA plans the following three actions to address the identified barriers:

(1) Prioritize equitable design, user experience, and responsible adoption. GSA intends to expand stakeholder engagement and usability testing with communities that have been identified as historically underrepresented in the design process and are most vulnerable to negative impacts of inequitable delivery of federal digital services. By building relationships with organizations serving socially marginalized communities and offering paid research opportunities for participants who face systemic barriers to equitable participation in usability testing, GSA can help drive how government services are created with the most underserved communities' needs in mind. **(2)** Improve accessibility and performance for older devices, mobile, rural, and low-bandwidth users. GSA will continue to invest in government shared digital services, such as Login.gov, USA.gov, USA.gov en Español, as well as sites built with the U.S. Web Design System, that allow visitors to complete their tasks regardless of internet connectivity. GSA's 18F, USAGov, Vote.gov, 10x, and Centers of Excellence (CoE) have already committed to co-designing practices with Tribal nations and Community-Based Organizations (CBO) that support people with disabilities. **(3)** Address discrimination in emerging technologies and data sovereignty. To provide an equitable remote identity-verification experience for a diverse population, GSA's Login.gov team will perform research studies on equity and bias in facial matching services. Further, GSA will apply an equity lens to the user guides it publishes, which influences governmentwide and industry best practices.

C. GSA plans to track progress of its equity in federal technology agenda as follows:

(1) Develop quantitative and qualitative metrics to measure customer experience. **(2)** Work with community partners to monitor experiences of customers for all a) TTS services; and b) those recommended or built for GSA partners. 18F, USA.gov, Vote.gov, and CoE will track the success of Community-Based Organizations partners to ensure a trend of improved representation in usability testing among research participants self-identified as being from underserved communities. User research is often an extractive process where communities are mined for value, with little value returned. GSA will work as community advocates to treat our research participants as voices of the community, not only research subjects. We will track the number of people who decline to participate—and reasons—to support process and policy changes that will help build trust with and provide value for communities that have been historically harmed by government policies. **(3)** GSA teams will perform accessibility assessments following industry-approved standards, run usability tests and user interviews to measure and improve task completion rates, and page load times for low- and limited-bandwidth connections to prioritize work to improve the usability of government websites. GSA will use a baseline level of skills for conducting research so as not to do harm to the public, specifically marginalized communities. In addition, GSA will share research insights across the agency to make sure we are not re-asking the same questions and possibly re-triggering research participants.

In the next year, we will be building up our research operations practices and relationships with organizations that serve communities going through the major life experiences, including working with new and expecting parents, Tribal communities, and other life experiences and priorities identified in the "Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government" (E.O. 14058) as well as the President's Management

Agenda. Over the next two to four years, we will be building relationships that cover all the platforms and services that TTS owns. Our long-term goal is that all federal websites and services are accessible, understandable, and easy-to-use regardless of race, ability, or comfort with technology. By working with Tribal nations and Community-Based Organizations, we will be able to build long-term relationships with communities and individuals to track directly how well services work and are serving the public's needs over time.

D. GSA will use the following strategies to maintain accountability:

(1) Transparency, reporting, and feedback. In partnering with Tribal nations and Community-Based Organizations, GSA will engage research participants in our research synthesis. Our long-term goal is to work with end users and community partners to build digital services that meet their needs as they move through different stages of their life, rather than systems built just for individual tasks. **(2)** GSA uses platforms such as Digital.gov and other TTS blogs to regularly publish what we learn and how that information will shape the direction of our programs and services. **(3)** When applicable, GSA will also partner with third-party experts to prepare and publish regular performance reports and best practices for implementing emerging technologies in an equitable and accessible way. We will not deploy facial recognition, liveness detection, or any other emerging technology into production environments until rigorous review has given us confidence that they can be implemented equitably and without causing disproportionate harm to vulnerable populations.

While it takes time to build trust with communities that have historically faced institutional discrimination and harm, the feedback and guidance that can only come from long-term partnerships with communities will create a trust that federal technology services are not only accessible, but delivered equitably.

Advancing Civil Rights Actions Across the Agency

GSA's Office of Civil Rights administers GSA's Nondiscrimination in Federally Assisted Programs and Federally Conducted Programs to ensure compliance with federal civil rights laws, regulations and executive orders that prohibit discrimination on the bases of race, color, national origin, sex, disability, or age by recipients of federal financial assistance and in federally conducted programs and activities.

A. Civil rights and equity in GSA federally assisted programs

GSA administers a civil rights compliance program for one of GSA's major federal financial assistance programs, the Federal Surplus Personal Property Donation Program. The donation program is administered in each of the 56 States and territories by a State Agency for Surplus Property (SASP). In addition, State agencies, cities, local governments, and non-profit organizations for the purposes of public health or education or services to veterans may obtain federal surplus personal property through the donation program. Examples of donees that receive the property include, but are not limited to, State prisons, State highway or public health departments, county or city law enforcement departments, public works departments, and homeless shelters or food banks. The SASPs, as well as the public entities and organizations that receive the

federal surplus personal property through the SASPs, are required to comply with federal civil rights laws.

During FY 2022 to FY 2026, GSA will focus its civil rights compliance efforts as follows:

- GSA will conduct civil rights compliance reviews of the 56 SASPs, with a target of reviewing 14 SASPs each fiscal year. These reviews will focus on verifying that methods of administration are in place to provide for the fair and equitable donation of federal surplus personal property to eligible underserved communities and eligible non-profit organizations. Methods reviewed will include (1) assessment of the SASPs' outreach programs and activities to underserved communities; (2) a survey of the SASPs' facilities and programs to verify that they are accessible to individuals with disabilities; and (3) a review of the SASPs' procedures to verify meaningful access for individuals with limited English proficiency.
- GSA will also conduct civil rights compliance reviews of the largest recipients of federal surplus personal property to verify their programs and activities are similarly accessible to the public they serve.
- Each fiscal year, GSA will develop and deliver civil rights training to the SASPs and recipients being reviewed. The training will highlight the SASPs' statutory civil rights responsibilities and their alignment with this Administration's commitment to equity and environmental justice.
- Each fiscal year, GSA will partner with five SASPs to develop and launch a robust stakeholder engagement plan that promotes the benefits of the donation program to five underserved communities.

B. Civil rights and equity in GSA-conducted programs and activities

GSA conducts programs and activities that interact with members of the public, small businesses, employees of occupant agencies, and communities. In FY 2022, GSA will prioritize the following actions:

- GSA will reassess and update GSA's Language Access Plan to afford meaningful access for individuals with limited English proficiency to GSA's programs and activities, in alignment with recent executive orders focusing on equity, environmental justice and climate.
- GSA will collaborate with GSA's program staff to develop and implement GSA's new five-year Environmental Justice Strategy that advances environmental justice in alignment with the executive orders mentioned above.
- GSA will develop and launch employee training that addresses equity and environmental justice at GSA. The training will highlight the work that GSA accomplishes and its relationship to civil rights, the principles of equity and environmental justice. This training will be offered on a quarterly basis each fiscal year.
- GSA's environmental justice working group will review and evaluate GSA's policies, procedures and practices in procurement, real property, personal property, services, and supplies to integrate civil rights and environmental justice principles consistent with the executive orders and GSA's Climate Risk Management Plan. Recommendations for any changes will be made to the appropriate lead organization.