Federal Agency Annual EEO Status Report
(MD-715 Report)

The fiscal year 2020 (FY20) Federal Agency Annual EEO Status Report (MD-715 Report) was compiled in accordance with the Equal Employment Opportunity Commission (EEOC) *Instructions to Federal Agencies for EEO MD-71*5.

The MD-715 Report serves two main purposes:

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

The EEOC report template contains 10 mandatory Parts (A through J) and 18 mandatory data tables (A-1 through B-9). Each Part contains specified information, so that the collective report identifies:

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

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

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

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

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EEOC FORM 715-02 PART A - D	*U.S. Equal Employment Opportunity Commission* FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

General Services Administration	For period covering October 1, 2019 to September 30, 2020

PART A Department or Agency Identifying Information				
	1. Agency		**1.** General Services Administration	
	1.a 2nd level reporting component			
	2. Address		**2.** 1800 F St. NW	
	3. City, State, Zip Code		**3.** Washington, DC 20405	
	4. Agency Code	**5.** FIPS code(s)	**4.** GS00	**5.** 4177

PART B Total Employment		
	1. Enter total number of permanent full-time and part-time employees	**1.** 11253
	2. Enter total number of temporary employees	**2.** 295
	3. TOTAL EMPLOYMENT [add lines B 1 through 2]	**4.** 11548

PART C

Agency Official(s) Responsible For Oversight of EEO Program(s)

Title Type	Name	Title
Head of Agency	Katy Kale	Acting Administrator
Head of Agency Designee	Katy Kale	Deputy Administrator
Principal EEO Director/Official	Mary D. Gibert	Associate Administrator, OCR
Complaint Processing Program Manager	Sylvia Anderson	EEO Manager
Diversity & Inclusion Officer	Darlene H. Smith	Supervisory HR Specialist, OHRM
Hispanic Program Manager (SEPM)	Edgar Delgado	Contract Specialist
Women's Program Manager (SEPM)	Ling XU	Program Analyst
Disability Program Manager (SEPM)	Taunya Stewart	HR Specialist
Special Placement Program Coordinator (Individuals with Disabilities)	Taunya Stewart	HR Specialist
Reasonable Accommodation Program Manager	Alex Vernacchio	Supervisory HR Specialist
Anti-Harassment Program Manager	Alex Vernacchio	Supervisory Human Resources Specialist
ADR Program Manager	Kellyann Williams	Supervisory EEO Specialist
Compliance Manager	Porsha Phipps-McCrary	EEO Specialist
Principal MD-715 Preparer	Paul Boinay	Affirmative Employment Program Manager
Other EEO Staff	Aluanda Drain	Deputy Associate Administrator

PART D
List of Subordinate Components Covered in This Report

Subordinate Component and Location (City/State)	Country	Agency Code
General Services Administration Washington, DC	United States	GSSO
General Services Administration Washington, DC	United States	GSSO
General Services Administration Washington, DC	United States	GS01
General Services Administration Washington, DC	United States	GS02
General Services Administration Washington, DC	United States	GS03
General Services Administration Washington, DC	United States	GS04
General Services Administration Washington, DC	United States	GS10
General Services Administration Washington, DC	United States	GS11
General Services Administration Washington, DC	United States	GS12
General Services Administration Washington, DC	United States	GS13
General Services Administration Washington, DC	United States	GS14
General Services Administration Washington, DC	United States	GS15
General Services Administration Washington, DC	United States	GS16
General Services Administration Washington, DC	United States	GS19
General Services Administration Washington, DC	United States	GS32
General Services Administration Washington, DC	United States	GS22
General Services Administration Washington, DC	United States	GS30
General Services Administration Washington, DC	United States	GSSO
General Services Administration Washington, DC	United States	GSSO

EEOC FORMS and Documents	Required	Uploaded	
Reasonable Accommodation Procedure	Y	Y	
Personal Assistance Services Procedures	Y	Y	
Agency Strategic Plan	Y	Y	
Alternative Dispute Resolution Procedures	Y	Y	
EEO Policy Statement	Y	Y	
Organization Chart	Y	Y	
Anti-Harassment Policy and Procedures	Y	Y	
EEO Strategic Plan	N	N	

EEOC FORMS and Documents	Required	Uploaded	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	N	
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	N	
Human Capital Strategic Plan	N	N	
Diversity Policy Statement	N	N	

EXECUTIVE SUMMARY: MISSION

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

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

GSA is the government landlord, creating a 21st century workplace across government to drive down costs and increase productivity. GSA is also the premier source for equipment, supplies, telecommunications, and integrated information technology to federal agencies. GSA has an annual contract volume of over $60 billion, manages over 200,000 fleet vehicles, assists tens of thousands of federal travelers through GSA’s electronic travel system, and serves as the focal point for data, information, and services offered by the federal government to its citizens. About 11,500 employees provide valuable support to other federal agencies and the general public.

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Background:

GSA conducted its fiscal year 2020 (FY20) Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715) Self-Assessment in two iterations. The first iteration was completed prior to the hire of the new Affirmative Employment Program Manager (AEPM). After onboarding in March 2021, the AEPM conducted a second iteration of targeted assessments, focusing on Part G measures with objective criteria in order to validate key compliance measures in the limited time available before the deferred submission deadline for the FY20 Annual Agency EEO Program Status Report (a.k.a. MD-715 Report). The AEPM will conduct a comprehensive validation of all compliance measures as part of the FY21 reporting cycle.

Summary:

GSA showed strength in FY20 in the genuine leadership commitment and engagement of the Acting Administrator, senior staff, and senior executives; the exceptional collaboration between the Office of Human Resources Management (OHRM) and Office of Civil Rights (OCR); and in its systematic progress toward correcting identified deficiencies. Additionally, the agency made significant improvements in its participation rates of both People with Disabilities (PWD) and People with Targeted Disabilities (PWTD), with both rates likely to exceed key Federal Goals for the very first time. Those specific improvements were made after the FY20 data tables were developed and will not be reflected in the MD-715 Report data tables until the FY21 submission.

The agency resolved a major gap in its Affirmative Employment Program (AEP) through its hire of a new AEPM and reestablishment of related program activities. The absence of an AEPM previously resulted in identified deficiencies (e.g., associated with barrier analysis resources and activities), as well as previously unidentified deficiencies (due primarily to the lack of trained personnel to conduct effective assessments and analyses). All AEP-related deficiencies have since been resolved. Rapid progress has been made toward developing and executing AEP goals and significant results have already been achieved. Appropriate, meaningful barrier analysis activities were ongoing at the time this report was drafted, and although no barriers have yet been identified, related plans are progressing and all relevant parties have been engaged and are collaborating well, including senior leaders, OHRM (e.g., Talent Development, Human Capital Analytics, Workforce Relations), and other programs, initiatives, and teams (e.g., Special Emphasis Programs (SEPs), affinity groups, the GSA Equity Team, and staff working on GSA's Diversity, Equity, Inclusion, and Accessibility (DEIA) initiatives).

Not including the AEP-related deficiencies (which were resolved after the end of the fiscal year), GSA identified six other deficiencies as part of its FY20 MD-715 Self-Assessment, including (1) untimely processing of requests for reasonable accommodations; (2) untimely counselling of equal employment opportunity (EEO) complaints; (3) untimely issuing of final agency decisions; (4) GSA strategic plan lacking EEO, diversity, or inclusion principles; (5) GSA organization chart not clearly showing the reporting chain from the EEO Director to the agency head; and (6) the GSA Exit Survey lacking disability-related questions. Relevant program strengths, deficiencies, and accomplishments are listed below according to the Equal Employment Opportunity Commission's (EEOC's) "Six Essential Elements of Model EEO Programs."

Breakdown by the Six Essential Elements of Model EEO Programs:

A. Within the Essential Element "Demonstrated Commitment from Agency Leadership," GSA demonstrated strength through the top-down communications of the Acting Administrator and the direct engagement of a significant portion of its senior leaders in various aspects of EEO, AEP, SEPs, affinity groups, and DEIA-related initiatives. Additionally, other strengths include GSA's dissemination of relevant policies and procedures to all employees and the effectiveness of its efforts to ensure all employees are regularly informed of key information relating to EEO.

B. Within the Essential Element "Integration of EEO into the Agency's Strategic Mission" there were two deficiencies due to the lack of EEO, diversity, and inclusion principles in the agency strategic plan, and because the agency organization chart does not accurately show that the EEO Director reports directly to the agency head. GSA did, however, make significant improvements in several areas of mandatory compliance:

1. GSA hired an AEPM and conducted comprehensive trigger identification analyses and prioritized barrier investigations, with the assistance and engagement of senior managers.

2. Simultaneously, GSA made progress with identifying executive sponsors and managers for affinity groups and SEPs at both the agency level and subcomponents, and in ensuring collaboration between the AEPM, SEP Managers, affinity groups, and Executive Sponsors, in order to support both the AEP and SEPs, as well as GSA's DEIA-related initiatives.

3. GSA also initiated analyses of its demographic data system, Reasonable Accommodations Program data system, and Anti-Harassment Program data.

4. The OHRM Talent Development Division implemented a detailed program for monitoring and encouraging compliance with manager and supervisor training requirements, including mandatory training topics identified in MD-715 Part G.

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

C. Within the Essential Element "Management and Program Accountability," there were two notable positive outcomes: First, GSA published revised Anti-Harassment policy and procedures, incorporating technical guidance provided by EEOC to address identified deficiencies. Second, strong collaboration between OCR and OHRM was instrumental to both the successful resolution of many previous shortfalls affecting the MD-715 Report and to achieving systemic progress on barrier analysis efforts. The agency had one deficiency in this Essential Element due to untimely processing of requests for reasonable accommodations.

D. GSA made excellent progress in the Essential Element "Proactive Prevention of Discrimination." Most of the progress was made after the end of the fiscal year reporting cycle, resulting in resolution of many previously identified deficiencies:

1. A new AEPM was hired, enabling progress on identification and prioritization of key triggers and initiation of barrier investigations, with excellent collaboration of senior managers and OHRM major factors contributing to many related achievements.

2. GSA also made progress on disability-related surveys, initiating revisions to the GSA Exit Survey to add additional questions on how to improve the recruitment, hiring, inclusion, retention, and advancement of PWD, as well as initiation of re-survey efforts encouraging self-identification of disability status and race/ethnicity. Because the Exit Survey updates are still pending, this issue shows up as a reported deficiency in Part H.

3. In addition to disability-related surveys, significant progress was made in several areas relating to "steps reasonably designed to increase the number of PWD and PWTD employed at the agency," details of which are provided in the accomplishments section. By systematically identifying and correcting and improving employee data, encouraging self-identification, and taking full advantage of PWD classification through requests for reasonable accommodation and records relating to appointments under hiring authorities that take disability into account, GSA is poised to achieve substantial overall increases in both its PWD and PWTD participation rates. PWD participation will increase by more than 15%, from 10.95% to 12.62% and PWTD participation will increase by over 48%, from 2.1% to 3.12%. Due to the ongoing nature of the improvements, which occurred after the production of the FY20 data tables, these increases will not be reflected in the B tables until FY21.

E. Within the Essential Element "Program Efficiency," GSA achieved an 89% increase in the timeliness of its EEO counseling, compared to FY19; however, 1 of 113 FY20 counseling events was not timely, which is technically a reportable deficiency. Untimely final agency decisions (FADs) (3 of 28) was also a technically deficiency; however, there were mitigating circumstances, as they were processed in accordance with the EEOC Office of Federal Operations guidance in response to COVID-19.

F. GSA fulfilled all measures within the Essential Element "Responsiveness and Legal Compliance."

Other Relevant Deficiencies, Potential Issues, and EEOC Requests:

In addition to the deficiencies identified as part of the FY20 MD-715 Self-Assessment process, other deficiencies were identified by the EEOC during its triennial technical assistance review (TAR) of the GSA. In the EEOC's TAR letter, it acknowledged previously identified deficiencies (which had not yet been resolved at the time of the TAR), as well as new issues which collectively include:

1. Failure to conduct barrier analyses

2. Non-compliant Anti-Harassment procedures

3. Shortfalls in the agency's efforts to achieve federal goals for participation of PWD and PWTD (e.g., the lack of regular resurveys of the GSA workforce)

4. The lack of an agency-wide career development program (with emphasis on the lack of GSA use and/or centralized tracking of details and job assignments as developmental tools for PWD and PWTD)

5. The need to provide an update to EEOC on progress in adding disability-related questions on the GSA Exit Survey

After the EEOC TAR, GSA made progress on all the identified issues. The agency hired an AEPM and restarted its ongoing program of barrier analyses; issued compliant revisions to its Anti-Harassment procedures, achieved noteworthy gains in PWD and PWTD participation; developed communications to facilitate an agency-wide resurvey effort; established baseline Career Development Program data and relationships between OCR and OHRM Talent Management to broaden the data to include details, internships, and mentoring; and developed revisions to the GSA Exit Survey to fulfill relevant regulatory requirements.

In addition to the deficiencies identified in its self-assessment and during the EEOC TAR, GSA also identified other potential issues that will require further analysis, including issues relating to alignment of workforce and applicant data with business rules outlined in the *EEOC*

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Instructions to Federal Agencies for EEO MD-715. Lastly, more comprehensive reviews of data from other relevant programs (e.g., Anti-Harassment, Reasonable Accommodations, Alternative Dispute Resolution, career development, EEO-related training) are also warranted, in order to ensure accurate Part G Assessment results.

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

As part of its corrective plans for FY19, GSA developed and implemented a comprehensive Trigger Identification Tool and used it to complete a detailed analysis of all available FY20 workforce and applicant flow data. Twelve particularly notable data table triggers were identified as candidates for FY21 barrier investigations.

With the assistance of senior managers, and in alignment with EEOC guidance from their 2020 TAR, five data table triggers were prioritized for FY21 root cause analysis. Those include:

1. Low participation of PWD and PWTD in all Mission Critical Occupations (MCOs). Within GSA, there has been an upward trend in overall participation of both groups for each of the past five years; however, those trends do not translate into commensurate participation rates in any of GSA's eight MCOs, which together comprise 72% of the workforce.
2. Low participation of PWD and PWTD in high grade levels. PWD and PWTD both have very high participation rates in the grade levels GS4 thru GS10 (GSA has no employees in grade levels GS1 thru GS3); however, at GS13 and above, both groups have lower than expected participation rates.
3. Low participation of Hispanic Males and Hispanic Females in high grade levels, following an identical grade-level profile as PWD and PWTD, above.
4. Low participation of Black Males and Black Females in high grade levels, also following an identical grade-level profile as PWD and PWTD, above. Notably, both Black Males and Black Females have very high participation in every GSA subcomponent and every MCO. Grade level distribution is baselined against actual overall participation within GS4 thru SES (Senior Executive Service).
5. Closely related to Triggers 2 thru 4, above, the root causes of the demographic distribution of the SES and Other Senior Pay categories will also be analyzed, as many groups show lower than expected participation levels.

In addition to those triggers, seven other data table triggers were assessed as warranting closer tracking and potential future root cause analyses:

1. Low selection rates of Black Males and Black Females in Internal Competitive Promotions to most MCOs.
2. Low selection rates of Hispanic Males and Hispanic Females in Internal Competitive Promotions to certain MCOs.
3. Low selection rates of Black Males and Black Females in New Hires to certain MCOs.
4. Low application rates of White Females to New Hires to every MCO.
5. Low participation of all non-White demographic groups in Executive Management positions.
6. Low participation of Black Males, Black Females, and Asian Males in Time-Off Awards.
7. Low participation of Hispanic Males/Hispanic Females, Black Males/Black Females, and PWD/PWTD in high-level Cash Awards. Notably, this condition shows a strong correlation to grade-level distribution, which is the focus of Triggers 2 thru 4, above.

In addition to data table triggers, the agency also assessed other sources of information, including complaints data, affinity group inputs, and organizational climate survey information from the Federal Employee Viewpoint Survey, and is correlating relevant information from those sources with the data table triggers, as part of the planned FY21 barrier investigations.

GSA is evolving its Barrier Analysis Workgroup (BAW) framework, so that it has greater flexibility to adapt to various analysis topics by tailoring individual workgroup memberships using relevant subject matter experts. To that end, the AEPM met with each of the SEPMs and their Executive Sponsors, and in separate forums with Affinity Groups and their Executive Sponsors, as well as with members of other constituent groups. The purpose of those meetings was to provide everyone who might be involved in future barrier analyses with a common understanding of the AEP, MD-715, EEOC Instructions to Federal Agencies for EEO MD-715, barrier analysis procedures, and FY20 findings. Additionally, the AEPM also briefed members of OHRM's Office of Human Capital Strategy's Analytics and Strategy Division and Human Capital Analytics Branch to facilitate refinement of initial data analyses, in order to narrow trigger findings and make future root cause analyses more efficient and effective.

Separate from barrier analyses, GSA also intends to assess its statistics and trends relating to self-identification during the application process (via the SF-181 and SF-256). The goals of that effort are to (1) understand and improve the rates of applicant/employee self-identification and (2) to develop the capability to differentiate between artificially designated demographics (such as when the SF-181 and/or SF-256 forms are left blank) and demographics that are genuinely self-identified by agency employees.

Furthermore, in alignment with the recommendations from the EEOC's 2020 TAR, GSA also initiated development of mechanisms to improve upon self-identified data by using information derived from requests for reasonable accommodations and hiring authorities that take disability into account, in accordance with 29 CFR § 1614.203.d.6.ii. Key components of this effort will include:

1. Establishment of procedures so that data from all three sources can be accurately and consistently compiled, so that PWD/PWTD are neither overlooked nor double or triple-counted.

2. Establishment of relevant time constraints for considering disability status information generated from reasonable accommodations requests and use of relevant hiring authorities.

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

3. Establishment of relevant event-driven constraints for considering disability status information (e.g., how to address disability status derived from hiring authorities, after Schedule A(u) hires are converted).

4. Establishment of precedence for conflicting information from different sources.

Preliminary analysis of data from reasonable accommodations and disability-related hiring authorities identified 109 employees who were hired under Schedule A(u) in FY20 and/or submitted requests for reasonable accommodations in FY20, but have status within the personnel data system of record (HR Links) as either No Disability (Code 05) or Not Identified (Code 01).

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

1. The agency resolved a major gap in its Affirmative Employment Program (AEP) through its hire of a new AEPM and reestablishment of related program activities. The absence of an AEPM previously resulted in many identified deficiencies (e.g., associated with barrier analysis resources and activities) as well as previously unidentified deficiencies (due primarily to the lack of trained personnel to conduct effective assessments and analyses). All AEP-related deficiencies have since been resolved. Rapid progress has been made toward developing and executing program goals and significant results have already been achieved. Appropriate, meaningful barrier analysis activities were ongoing at the time this report was drafted. Senior manager engagement in the process was furthered by progress made on identifying Executive Sponsors and managers for Affinity Groups and SEPs at both the agency level and subcomponents, and ensuring collaboration between the AEPM, SEPMs, Affinity Groups, and Executive Sponsors, in order to support both the AEP and SEPs, as well as GSA's DEIA-related initiatives.

2. The agency incorporated guidance from the EEOC 2020 TAR to generate and issue compliant revisions to its Anti-Harassment procedures.

3. Career Development data was obtained by OHRM's Talent Development Division and merged with employee demographic data and eligibility data developed by the Analytics and Strategy Division Human Capital Analytics Branch, enabling relevant table data to be generated for the first time in two years. That success resolved a compliance deficiency and improved GSA's ability to perform key barrier analyses directly related to several FY20 triggers. In addition to establishing baseline Career Development Program data, collaborative relationships were established between OCR and OHRM Talent Management to broaden the FY20 data to include details, internships, and mentoring programs, to better support disability program management and improve Part J data.

4. Employee disability statistics were significantly improved, through many independent efforts:

(a) Revision of employee records by the Processing/Personnel Records Management Center. A total of 93 personnel records were found to have retained outdated disability codes, predating the 2017 code revisions by the Office of Personnel Management (OPM). As a result, 93 PWTD (and PWD) were not counted among GSA's relevant statistics between 2018 and 2020. This error was identified and resolved after completion of the FY20 data tables and just prior to the report submission. Given the level of effort required to generate new B Tables with the corrected data, the FY20 tables were not revised; however, preliminary analyses indicate that the code revisions will have significant positive impacts on overall statistics, increasing PWD by 7%, from 10.95% to 11.68%, and PWTD by 34%, from 2.10% to 2.82%. Incorporating those corrections will all but certainly enable GSA to meet the 2% Federal Goal for PWTD participation in the high (GS10 to SES) tier.

(b) Collaboration between OCR and OHRM's Workforce Relations Division yielded similar benefits to PWD data, using requests for reasonable accommodations (RA). Analysis of FY20 non-recurring RA requests showed that 100 out of 138 employees (72.5%) who requested RA have not self-identified as having a disability. As with the coding changes in the previous paragraph, the RA-related disability data was analyzed after the tables were developed, and associated changes have not been incorporated into the FY20 tables. Even without accounting for PWTD (which historically account for roughly 21 percent of GSA PWD), and without considering prior-year RA requests, addition of these 100 PWD will raise the overall PWD rate by 7.4%, to 12.54%, above the 12% Federal Goal for the first time. In combination with the revised disability codes, this may also be sufficient to achieve the 12% Federal Goal for PWD participation in the GS10 to SES tier for the first time, as well.

(c) Further assistance from the Human Capital Analytics Branch produced statistics on FY20 use of hiring authorities that take disability into account. Data from four different hiring authorities was obtained; however, preliminary analyses focused on 59 Schedule A(u) hires, of which 9 employees did not self-identify a disability within the HR Links system of record. Incorporation of those employees into relevant categories will further improve GSA's PWD and PWTD rates. Analysis of hires made under both the Veterans' Recruitment Appointment (VRA) and Veterans Employment Opportunities Act (VEOA) could not be completed prior to report submission, due to the need to identify which specific provisions under those authorities were used by the 50 employees hired under VRA or VEOA in FY20. Analysis of VRA and VEOA will be conducted in FY21.

Collectively, these three data improvements will result in very substantial overall increases in both PWD and PWTD participation rates. PWD participation will increase by more than 15%, from 10.95% to approximately 12.6% and PWTD participation will increase by over 48%, from 2.1% to roughly 3.1%. Due to the ongoing nature of the improvements, which occurred after the production of the FY20 data tables, these increases will not be reflected in the B tables until FY21. Furthermore, expansion of data beyond FY20 and incorporation of VRA and VEOA statistics will also serve to increase PWD and PWTD participation even further.

5. GSA made progress on disability-related surveys, including initiating revisions to the GSA Exit Survey to add questions on how to improve the recruitment, hiring, inclusion, retention, and advancement of PWD, as well as initiation of an FY21 Self-Identification Campaign to encouraging self-identification of disability status and race/ethnicity. The AEP will be monitoring the agency's disability statistics throughout the resurvey process to better understand participation in the Campaign and changes in GSA's disability status data.

6. The OHRM Talent Development Division implemented a detailed program for monitoring and encouraging compliance with Manager and Supervisor training requirements, including mandatory training topics identified in MD-715 Part G.

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

7. An Alternative Benchmark template was implemented to use Occupational Civilian Labor Force (OCLF) data to produce a Relevant CLF more applicable than the National Civilian Labor Force (NCLF). The template uses the OCLFs of the most populous GSA Occupational Series to account for 99.2% of the workforce and produce an aggregated OCLF based on actual populations within each GSA occupation. In the future, GSA intends to supplement this with State CLF data to provide more relevant baselines for EEO barrier analyses and to support EEO and DEIA-related initiatives undertaken by GSA's Affinity Groups and SEPs.

8. Strong collaboration between the Analytics and Strategy Division Human Capital Analytics Branch and OCR resulted in numerous enhancements to GSA's ability to analyze its workforce data:

(a) Narrative eligibility information was used to develop eligibility pools for seven different Competitive Development Programs to support development of MD-715 data tables needed for FY21 barrier investigations.

(b) Subcomponent data elements (GSA Regions, Offices, and Services) were added to enable more refined barrier analyses.

(c) Outdated disability codes were quickly revised immediately after their discovery.

(d) Schedule A(u) data was generated and analyzed to build MD-715 tables and assess means of incorporating data on hiring authorities that take disability into account.

(e) Grade level data was incorporated to enable development of missing MD-715 data elements and improve analysis of MCOs.

EXECUTIVE SUMMARY: PLANNED ACTIVITIES

The Affirmative Employment Program has eight primary plans for FY21 and beyond:

1. Completing a comprehensive assessment of agency compliance with all Part G measures, using and/or establishing objective criteria, where possible, to ensure accurate, consistent measurement and reporting. Where relevant, documenting and correcting (and where necessary, reporting) identified areas of deficiency, including current Part G deficiencies in timeliness of Reasonable Accommodations, counseling, and FADs.

2. Establishing and maintaining effective ongoing programs of barrier investigation by broadening outreach to appropriate subject matter experts and members of relevant constituent groups, providing tailored training to barrier analysis teams, and using effective program management to establish and systematically achieve investigative goals.

3. Improving GSA workforce and applicant data systems to provide complete and accurate data to support MD-715 data tables and Part J requirements in accordance with EEOC *Instructions to Federal Agencies for EEO MD-715*. Secondarily, improving the data systems in order to automate production of relevant data tables and/or trigger analysis tools. Lastly, enhancing the systems to enable generation of automated data tables for key subordinate components (e.g., Regions, Offices, and Services) in order to facilitate more focused root cause analyses.

4. Developing and implementing protocols for incorporating data from requests for reasonable accommodations and usage of disability-related hiring authorities into disability status information derived from the self-identification process.

5. Reinvigoration of the Special Program Plan for PWD, with emphasis on both establishing mechanisms for supplying all mandatory data and answering all Part J questions, and developing and implementing relevant plans to improve recruitment, hiring, advancement, and retention of PWD.

6. Establishing a core group of contacts within OHRM to support barrier analyses with direct information and/or to facilitate identification of subject matter experts relevant to the triggers being analyzed.

7. Broadening of contacts within SEPs and Affinity Groups, to support barrier analyses for specific demographic groups.

8. Expansion of career development data, to incorporate programs such as details, internships, mentoring, and other relevant programs and training opportunities.

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Aluanda Drain (Insert Name Above) Acting EEO Director/0260/GS-15 (Insert official title/series/grade above) am the

Principal EEO Director/Official for General Services Administration (GSA) (Insert Agency/Component Name above)

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

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

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

DocuSigned by:
Aluanda Drain
37F54F153CD24B8...

Signature of Principal EEO Director/Official Date 6/30/2021
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

Signature of Agency Head or Agency Head Designee Date 6/30/2021

Agency Self-Assessment Checklist

Essential Element: A Demonstrated Commitment From agency Leadership

Compliance Indicator / Measures	A.1. The agency issues an effective, up-to-date EEO policy statement.	Measure Has Been Met: Yes	Measure Has Been Met: No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
A.1.a. Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "Yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]		X			Annual issuance date was October 4, 2019 10/4/2019
A.1.b. Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.		X			Family medical history, ethnicity, and retaliation are also listed

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Compliance Indicator / Measures	A.2. The agency has communicated EEO policies and procedures to all employees.	Measure Has Been Met: Yes	Measure Has Been Met: No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
A.2.a. Does the agency disseminate the following policies and procedures to all employees:					
A.2.a.1. Anti-harassment policy? [see MD 715, ll(A)]		X			
A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		X			
A.2.b. Does the agency prominently post the following information throughout the workplace and on its public website:					
A.2.b.1. The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]		X			
A.2.b.2. Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]		X			
A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.		X			https://insite.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-23001-hrm-chge-1 (internal website) and https://www.gsa.gov/directive/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-1 (external website)
A.2.c. Does the agency inform its employees about the following topics:					

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A.2.c.1. EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often and the means by which such training is delivered.	X			Employees are informed during initial onboarding and subsequently via biennial training. Employees who are supervisors or managers receive formal EEO training, which is required within one year of accession or assignment to those positions, and at least once every three years thereafter
A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	X			Comment for A. 2.c.2 applies
A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	X			Comment for A. 2.c.2 applies
A.2.c.4. Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If "yes", please provide how often.	X			Comment for A. 2.c.2 applies
A.2.c.5. Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR §2635.101(b)] If "yes", please provide how often.	X			Employees are informed during initial onboarding and subsequently via biennial training.

Compliance Indicator / **Measures**	A.3. The agency assesses and ensures EEO principles are part of its culture.	**Measure Has Been Met**			**For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report**
		Yes	No	N/A	
A.3.a. Does the agency provide recognition to employees, supervisors, managers and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a)(9)] If "yes", provide one or two examples in the comments section. .		X			Complaint statistics are shared at least quarterly among Regional Administrators, and improvements/ low EEO totals are noted in the discussion.
A.3.b. Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]'		X			

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Essential Element: B Integration of EEO into the agency's Strategic Mission

Compliance Indicator / Measures	B.1. The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure Has Been Met: Yes	Measure Has Been Met: No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
B.1.a. Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]		X			
B.1.a.1. If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.				X	N/A
B.1.a.2. Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]			X		The agency organizational chart will be updated to show that the EEO Director reports directly to the Agency Head.
B.1.b. Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]		X			
B.1.c. During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If “yes”, please provide the date of the briefing in the comments column.		X			June 30, 2020
B.1.d. Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]		X			

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Compliance Indicator / Measures	B.2. The EEO Director controls all aspects of the EEO program.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
B.2.a. Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] If not, identify the office with this authority in the comments column.		X			
B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]		X			
B.2.c. Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]		X			
B.2.d. Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]		X			
B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]'		X			
B.2.f. Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]		X			
B.2.g. If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2); (c)(3)]		X			

Compliance Indicator / Measures	B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
B.3.a. Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]		X			
B.3.b. Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.			X		

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Compliance Indicator / Measures	B.4. The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
B.4.a. Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:					
B.4.a.1. to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]		X			
B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]		X			
B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]		X			
B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]		X			
B.4.a.3. to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR §§ 1614.102(c)(5); 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]		X			
B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.		X			
B.4.a.5. to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]				X	GSA does not have subcomponent EEO programs but does assess workforce data at the subcomponent level.
B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]		X			
B.4.a.7. to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)] If not, please identify the systems with insufficient funding in the comments section.		X			
B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		X			
B.4.a.9. to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C. 1]		X			
B.4.b. Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]		X			
B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]		X			
B.4.d. Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?		X			
B.4.e. Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?		X			

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Compliance Indicator / Measures	B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
B.5.a. Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:					
B.5.a.1. EEO complaint process? [see MD-715(II)(B)]		X			
B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]		X			
B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]		X			
B.5.a.4. Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]		X			
B.5.a.5. ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]		X			

Compliance Indicator / Measures	B.6. The agency involves managers in the implementation of its EEO program.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]		X			
B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]		X			
B.6.c. When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]		X			
B.6.d. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR §1614.102(a)(5)]		X			

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Essential Element: C Management and Program Accountability

Compliance Indicator / Measures	C.1. The agency conducts regular internal audits of its component and field offices.	Measure Has Been Met: Yes	Measure Has Been Met: No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
C.1.a. Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If ”yes”, please provide the schedule for conducting audits in the comments section.				X	GSA has a centrally managed and operated civil rights program; there are no separate programs run by subcomponents
C.1.b. Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If ”yes”, please provide the schedule for conducting audits in the comments section.				X	Comment for C. 1.a applies. Subcomponent data is generated and analyzed for triggers annually.
C.1.c. Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]				X	Comment for C. 1.a applies.

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Compliance Indicator / Measures	C.2. The agency has established procedures to prevent all forms of EEO discrimination.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
C.2.a. Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]		X			
C.2.a.1. Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]		X			
C.2.a.2. Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]		X			
C.2.a.3. Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]		X			
C.2.a.4. Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]		X			
C.2.a.5. Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.		X			
C.2.a.6. Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]		X			
C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]		X			
C.2.b.1. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR §1614.203(d)(3)(D)]		X			
C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]		X			
C.2.b.3. Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]		X			
C.2.b.4. Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR §1614.203(d)(3)(i)(M)]		X			
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.			X		64%
C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]		X			

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C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	X			https://www.gsa.gov/directive/policy-and-procedures-for-providing-reasonable-accommodation-for-individuals-with-disabilities-1

Compliance Indicator / **Measures**	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	**Measure Has Been Met**			**For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report**
		Yes	No	N/A	
C.3.a. Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?		X			
C.3.b. Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:					
C.3.b.1. Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]		X			
C.3.b.2. Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]		X			
C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]		X			
C.3.b.4. Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]		X			
C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]		X			
C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]		X			
C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]		X			
C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]		X			
C.3.b.9. Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]		X			
C.3.c. Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]		X			
C.3.d. When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]		X			

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Compliance Indicator / Measures	C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
C.4.a. Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]		X			
C.4.b. Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/ personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]		X			
C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]		X			
C.4.d. Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]		X			
C.4.e. Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:					
C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		X			
C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]		X			
C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]		X			
C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]		X			
C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]		X			

Compliance Indicator / Measures	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
C.5.a. Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR §1614.102(a)(6); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)]		X			
C.5.b. When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.		X			No (zero) individuals were sanctioned/ disciplined during FY20.
C.5.c. If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct (e.g., post mortem to discuss lessons learned)? [see MD-715, II(C)]		X			

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Compliance Indicator / Measures	C.6. The EEO office advises managers/supervisors on EEO matters.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
C.6.a. Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.		X			Annually
C.6.b. Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]		X			

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Essential Element: D Proactive Prevention

Compliance Indicator / Measures		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
	D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.				
D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]		X			
D.1.b. Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; and/or external special interest groups? [see MD-715 Instructions, Sec. I]		X			
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)]			X		

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Compliance Indicator / Measures	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]		X			
D.2.b. Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]		X			
D.2.c. Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]		X			
D.2.d. Does the agency regularly review the following sources of information to find barriers: complaint/ grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, and/or external special interest groups? [see MD-715 Instructions, Sec. I]] If “yes”, please identify the data sources in the comments column.		X			Agency barrier analyses make use of information from, such as complaint data (e.g., Form 462), grievance data, exit surveys, employee climate surveys (e.g., FEVS), focus groups, affinity groups, anti-harassment program data, SEPs, and interviews with other subject matter experts (e.g., facilities managers, Information Technology).

Agency Self-Assessment Checklist

Compliance Indicator / Measures	D.3. The agency establishes appropriate action plans to remove identified barriers.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
D.3.a. Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]		X			
D.3.b. If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]		X			
D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]		X			

Compliance Indicator / Measures	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.		X			https://www.gsa.gov/about-us/organization/office-of-civil-rights/office-of-civil-rights-library
D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]		X			
D.4.c. Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR §1614.203(d)(1)(ii)(A)]		X			
D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]		X			

Essential Element: E Efficiency

Agency Self-Assessment Checklist

Compliance Indicator / Measures	E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?			X		The agency timely counseled 112 of 113 FY20 events (99.1%).
E.1.b. Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?		X			
E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?		X			
E.1.d. Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.		X			20 days.
E.1.e. Does the agency ensure that all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?		X			
E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?		X			
E.1.g. If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?		X			
E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?			X		Where complainants did not request hearings, GSA timely issued final agency decisions in 6 of 9 cases (67%). All other types of final agency decisions (19 of 19) were timely. While technically untimely, there were clear mitigating circumstances, as GSA followed EEOC OFO guidance in response to COVID-19.
E.1.i. Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?		X			

Agency Self-Assessment Checklist

E.1.j. If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	X			Revisions are requested and carefully assessed and if systematic issues arise the contracts are not renewed.
E.1.k. If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	X			
E.1.l. Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	X			

Compliance Indicator / **Measures**	E.2. The agency has a neutral EEO process.	**Measure Has Been Met**			**For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report**
		Yes	No	N/A	
E.2.a. Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If "yes", please explain.		X			OCR has a full-time, in-house attorney serving as firewall counsel.
E.2.b. When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/ location of the attorney who conducts the legal sufficiency review in the comments column.		X			Comment for E. 2.a applies
E.2.c. If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]				X	Comment for E. 2.a applies
E.2.d. Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]		X			
E.2.e. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]		X			

Agency Self-Assessment Checklist

Compliance Indicator / Measures	E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
E.3.a. Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]		X			
E.3.b. Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]		X			
E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]		X			
E.3.d. Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]		X			
E.3.e. Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]		X			
E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]		X			

Compliance Indicator / Measures	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
E.4.a. Does the agency have systems in place to accurately collect, monitor, and analyze the following data:					
E.4.a.1. Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/ complainants, and the involved management official? [see MD-715, II(E)]		X			
E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]		X			
E.4.a.3. Recruitment activities? [see MD-715, II(E)]		X			
E.4.a.4. External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]		X			
E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		X			
E.4.a.6. The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]		X			
E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]		X			

Agency Self-Assessment Checklist

Compliance Indicator / Measures	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Has Been Met: Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
E.5.a. Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.		X			GSA assesses and monitors its performance of the 156 Part G compliance measures, which are linked to various EEO laws, regulations and EEOC Management Directives, Instructions, and guidance. Many measure(e.g., complaints processing, reasonable accommodations processing, training compliance) use empirical data which is tracked over time to assess status, trends, and progress.
E.5.b. Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.		X			GSA adopted data analysis practices developed and implemented by the U.S. Coast Guard (a similarly-sized agency) and benchmarking tools developed by the Department of the Navy.
E.5.c. Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]		X			

Agency Self-Assessment Checklist

Essential Element: F Responsiveness and Legal Compliance

Compliance Indicator / Measures	F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.	Measure Has Been Met: Yes	Measure Has Been Met: No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
F.1.a. Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]		X			
F.1.b. Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]		X			
F.1.c. Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]		X			
F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]		X			
F.1.e. When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]		X			

Compliance Indicator / Measures	F.2. The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Has Been Met: Yes	Measure Has Been Met: No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
F.2.a. Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]		X			
F.2.a.1. When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]		X			
F.2.a.2. When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]		X			
F.2.a.3. When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]		X			
F.2.a.4. Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?		X			

Agency Self-Assessment Checklist

Compliance Indicator / Measures		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
	F.3. The agency reports to EEOC its program efforts and accomplishments.				
F.3.a. Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]		X			
F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]		X			

Essential Element: O Other

Plan to Attain Essential Elements

PART H.1

Brief Description of Program Deficiency:	B.3.b. Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.

The agency strategic plan does not reference EEO / diversity and inclusion principles.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/15/2021	09/30/2022			Incorporate EEO/Diversity/Inclusion principles into the next revision of the agency strategic plan

Responsible Officials

Title	Name	Standards Address the Plan?
Chief Human Capital Officer	Traci DiMartini	Yes
EEO Director	Mary Gibert	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2022	Develop relevant EEO, Diversity, and Inclusion principles and incorporate them into relevant sections of the next revision to the agency strategic plan.	Yes		

Accomplishments

Fiscal Year	Accomplishment

Plan to Attain Essential Elements

PART H.2

Brief Description of Program Deficiency:	B.1.a.2. Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]

The agency Organization Chart does not clearly define the reporting structure for the EEO Office. The head of the EEO Office reports directly to the GSA Administrator (agency head); however, the current organizational chart shows a reporting relationship between the EEO Office and the Deputy Administrator.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
06/09/2021	12/01/2021			Update the agency Organizational Chart to show that the EEO Director reports directly to the Administrator (Agency Head).

Responsible Officials

Title	Name	Standards Address the Plan?
EEO Director	Mary Gibert	Yes
Chief of Staff	Brett Prather	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
07/01/2021	Convey EEOC MD-110 and MD-715 requirements to the Office of the Administrator.	Yes		
12/01/2021	Update the Organizational Chart to show the EEO Director reporting relationship with the Agency Head.	Yes		

Accomplishments

Fiscal Year	Accomplishment

Plan to Attain Essential Elements

PART H.3

Brief Description of Program Deficiency:	B.6.d. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR §1614.102(a)(5)]

GSA did not conduct activities associated with trigger identification or barrier investigation during FY19 or FY20. As a result, senior managers had not implemented any EEO Action Plans or incorporated relevant EEO Action Plan objectives into agency strategic plans.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	06/15/2021	04/06/2021	Obtain senior manager engagement in the barrier analysis process and in the development of EEO Action Plans to address identified Annual Agency EEO Program Status Report deficiencies.

Responsible Officials

Title	Name	Standards Address the Plan?
EEO Director	Mary Gibert	Yes
Chief Human Capital Officer (CHCO)	Traci DiMartini	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
06/15/2021	Conduct preliminary analysis of GSA Annual Agency EEO Program Status Reports for FY18 thru FY20 to identify data/information gaps, deficiencies, and other issues.	Yes		04/06/2021
06/15/2021	Conduct analysis of workforce and applicant data for FY18 thru FY20 to identify data gaps, errors, and triggers.	Yes		03/24/2021
06/15/2021	Brief OCR leadership (including EEO Director) and OHRM (including the Chief Human Capital Officer (CHCO)) on FY20 data analysis findings and obtain endorsement of recommended barrier investigation priorities for FY21.	Yes		03/24/2021
06/15/2021	Obtain senior leader and senior management engagement in the barrier analysis process, including commitment to participate in the barrier analysis process. development and implementation of relevant EEO Action Plans, and incorporation of EEO Action Plans into agency strategic plans, where warranted.	Yes		05/15/2021

Accomplishments

Fiscal Year	Accomplishment
2020	Immediately after hiring the new AEPM, GSA completed a comprehensive analysis of FY20 workforce and applicant data and identified relevant triggers. Identified triggers were briefed to senior leaders, including the Acting Administrator, Chief of Staff, and heads of staff offices, as well as senior executives serving as Executive Sponsors for GSA's SEPs and key Affinity Groups. Barrier analysis activities were still ongoing as of the time this report was drafted; however, senior leaders have been appropriately engaged in the barrier analysis process, and have demonstrated commitment to participating in the development and implementation of EEO Action Plans to eliminate or mitigate any barriers that are identified, as well as to their incorporation, where appropriate, into agency strategic plans.

Plan to Attain Essential Elements

PART H.4

Brief Description of Program Deficiency:	B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]

GSA did not conduct activities associated with trigger identification or barrier investigation during FY19 or FY20. As a result, no senior leaders participated in the barrier analysis process.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	09/30/2021	05/14/0221	Reestablish the Affirmative Employment Program and barrier analysis process, including senior manager participation.

Responsible Officials

Title	Name	Standards Address the Plan?
Deputy Associate Administrator, OCR	Aluanda Drain	Yes
Affirmative Employment Program Manager	Paul Boinay	Yes
Director, Mission Delivery, OCR	Darlene Thompson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
07/01/2020	Hire a new affirmative employment program manager.	Yes	04/11/2021	03/14/2021
09/01/2020	Evaluate agency needs and provide a project plan for rebooting program to OCR management for review.	Yes	06/11/2021	03/24/2021
09/30/2020	Develop a project plan for outlining senior managers involvement in barrier analysis.	Yes	06/11/2021	03/24/2021

Accomplishments

Fiscal Year	Accomplishment
2020	Immediately after hiring the new AEPM, GSA completed a comprehensive analysis of FY20 workforce and applicant data, both to identify any data shortfalls or issues and to identify relevant triggers. Several key shortfalls that could be addressed quickly (i.e., in time to meet the FY20 submission extension deadline) were systematically resolved, with the assistance/support of senior managers. Examples include adding career development data, Quality Step Increase (QSI) data, and grade-level data for Mission Critical Occupations. Corrections for data-related issues that could not be addressed by the FY20 deadline were still initiated and were showing progress at the time this report was drafted. Examples include updating of outdated disability codes of 93 employees and expansion of career development data to include information on a broader range of categories necessary to support Part J (e.g., details, internships, and mentoring programs, etc.). Identified FY20 triggers were briefed to senior leaders, including the Acting Administrator, Chief of Staff, and heads of staff offices, key executive-level councils and groups, as well as senior executives serving as Executive Sponsors for GSA's SEPs and Affinity Groups. Twelve trigger areas were identified as being particularly notable, of which five trigger areas were prioritized by senior leadership to be further analyzed as part of the FY21 barrier analysis program. Relevant subject matter experts (including senior leaders) were identified for each of the five trigger topics and root cause analyses were immediately initiated. Barrier analysis efforts were ongoing at the time this report was drafted.

Plan to Attain Essential Elements

PART H.5

Brief Description of Program Deficiency:	B.6.c. When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]

GSA did not conduct activities associated with trigger identification or barrier investigation during FY19 or FY20. As a result, senior managers did not assist in developing agency EEO action plans for Part I, Part J, or within the Part E Executive Summary.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	09/30/2021	03/24/2021	Reestablish the Affirmative Employment Program and enlist senior manager engagement and assistance in developing agency EEO action plans.

Responsible Officials

Title	Name	Standards Address the Plan?
Deputy Associate Administrator, OCR	Aluanda Drain	Yes
Director, Mission Delivery, OCR	Darlene Thompson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	Reestablish the Affirmative Employment Program	Yes	09/30/2021	03/13/2021
09/30/2020	Obtain senior manager engagement and assistance in trigger prioritization, barrier analyses, and development/implementation of agency EEO action plans	Yes	09/30/2021	03/24/2021

Accomplishments

Fiscal Year	Accomplishment
2020	Immediately after hiring the new AEPM, GSA completed a comprehensive analysis of FY20 workforce and applicant data, both to identify any data shortfalls or issues and to identify relevant triggers. Identified triggers were briefed to key senior leaders, including the Acting Administrator, Chief of Staff, and heads of key staff offices, as well as senior executives serving as Executive Sponsors for GSA's SEPs and key Affinity Groups. Twelve trigger areas were identified as being particularly notable, of which five were prioritized by senior leadership to be further analyzed as part of the FY21 barrier analysis program, supporting both Part I and Part J. Relevant subject matter experts were identified for each of the five trigger topics and root cause analyses were immediately initiated. Barrier analysis efforts were ongoing at the time this report was drafted, and no barriers were yet identified, so no corrective action plans have been developed; however, senior leaders and managers have been very engaged in the process, and will remain so throughout the barrier analyses and during the development of relevant action plans to eliminate or mitigate any barriers that are identified.

Plan to Attain Essential Elements

PART H.6

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.

The agency does not process all initial accommodation requests within the time frame set forth in its Reasonable Accommodations (RA) procedures. Additionally, it is difficult to calculate accurate Days in Process figures for accommodations requests due to issues with data used to track RA statistics. Lastly, GSA RA statistics are maintained by two separate offices (OHRM and the Office of the Inspector General (OIG)); however, the FY20 report does not include OIG RA data.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/17/2021	09/30/2021			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.

Responsible Officials

Title	Name	Standards Address the Plan?
OIG Reasonable Accommodations Program Manager	TBD	Yes
Affirmative Employment Program Manager	Paul Boinay	Yes
Director, Workforce Relations Division	Alexandra Vernacchio	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/01/2021	Analyze all FY20 OHRM RA requests and all FY21 requests through June 1, 2021, to identify untimely processed cases and their potential causes.	Yes		
09/15/2021	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.	Yes		
09/30/2021	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.	Yes		

Accomplishments

Fiscal Year	Accomplishment

Plan to Attain Essential Elements

PART H.7

Brief Description of Program Deficiency:	D.2.b. Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]

During FY19 and FY20, the agency lacked an AEPM and did not regularly examine the impacts of policies, procedures, and practices on EEO groups.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	09/30/2021	05/15/2021	Regularly examine the impacts of management/personnel policies, procedures, and practices by race, national origin, sex, and disability status.

Responsible Officials

Title	Name	Standards Address the Plan?
Affirmative Employment Program Manager	Paul Boinay	Yes
Acting Associate Administrator, OCR	Aluanda Drain	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	Hire an Affirmative Employment Program Manager, conduct initial review of policies, procedures, and practices, and establish plans for regular future examinations.	Yes	09/30/2021	05/15/2021

Accomplishments

Fiscal Year	Accomplishment
2020	The agency conducted a comprehensive analysis of workforce and applicant data for the period FY16 thru FY20 to indirectly assess outcomes of agency policies, procedures, and practices on application, qualification, referral, selection, hiring, promotion, career development, awards and recognition, and separation statistics.

Plan to Attain Essential Elements

PART H.8

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)]

The agency does not conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of persons with disabilities.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/2018	07/01/2019	09/30/2021		Modify exit survey to add disability-specific questions as described in EEOC's revised Part G checklist.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Human Capital Policy & Programs	Darlene Smith	Yes
Affirmative Employment Program Manager	Paul Boinay	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
07/01/2019	Develop revised exit survey questions that address requirements in EEOC's revised Part G checklist.	Yes	09/30/2021	05/24/2021
09/30/2021	OHRM to review proposed exit survey questions, incorporate them into the GSA Exit Survey, and disseminate the new survey (e.g., update links, etc.).	Yes		

Accomplishments

Fiscal Year	Accomplishment
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.

Plan to Attain Essential Elements

PART H.9

Brief Description of Program Deficiency:	D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]

During FY19 and FY20, the agency lacked an AEPM and a process for analyzing identified triggers to find possible barriers.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	10/01/2020			To reboot the affirmative employment program and re-engage OHRM.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Mission Delivery, OCR	Darlene Thompson	Yes
Deputy Associate Administrator, OCR	Aluanda Drain	No
Program Manager, Mission Delivery, OCR	TBD	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
07/01/2020	Hire a new affirmative employment program manager.	Yes		
09/01/2020	Evaluate agency needs and provide a project plan for rebooting program to OCR management for review.	Yes		
09/30/2020	Establish working group between OHRM and OCR by identifying key individuals within both programs.	Yes		
09/30/2020	Review the BAW group function and establish a plan for establishing group in FY 2021.	Yes		

Accomplishments

Fiscal Year	Accomplishment

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	09/30/2021	03/24/2021	Develop a process for analyzing identified triggers to find potential barriers.

Responsible Officials

Title	Name	Standards Address the Plan?
Affirmative Employment Program Manager	Paul Boinay	Yes
Acting Associate Administrator	Aluanda Drain	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	Develop procedures for analyzing triggers.	Yes	09/30/2021	03/24/2021
07/01/2020	Hire an AEPM.	Yes	06/01/2021	03/13/2021
09/01/2020	Establish Barrier Analysis Working (BAW) Group by identifying key individuals within OHRM and OCR.	Yes	09/30/2021	02/01/2021

Accomplishments

Fiscal Year	Accomplishment
2020	An AEPM was hired on March 13, 2021. The AEPM utilized effective templates and procedures to conduct a comprehensive analysis of GSA MD-715 data from FY16 thru FY2020. Triggers were identified for all available data elements and correlated across employment milestones and according to EEO demographic groups. Twelve major trigger areas were identified as being particularly notable, of which five were prioritized by senior leadership for FY21 barrier investigations.

Plan to Attain Essential Elements

PART H.10

Brief Description of Program Deficiency:	D.2.d. Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, and/or external special interest groups? [see MD-715 Instructions, Sec. I]] If “yes”, please identify the data sources in the comments column.

During FY19 and FY20, the agency lacked an AEPM and did not regularly review relevant sources of information to find barriers (e.g., complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, etc.).

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	09/30/2021	05/15/2021	Regularly review other sources of information, aside from MD-715 data tables, to support agency barrier analyses.

Responsible Officials

Title	Name	Standards Address the Plan?
Affirmative Employment Program Manager	Paul Boinay	Yes
Director, Human Capital Policy & Programs	Darlene Smith	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Review other sources of information, besides MD-715 data tables, to support the barrier analysis process.	Yes		06/01/2021
09/30/2021	Identify capabilities of the Anti-Harassment Program and grievance program to support data requirements associated with barrier analyses.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2020	The AEPM was able to identify points of contact and review data for many sources of information (beyond the MD-715 tables), including complaints data, exit surveys, Federal Employee Viewpoint Survey (FEVS) climate surveys, Affinity Groups, and SEPs. Focus groups will be utilized to assist in relevant barrier investigations, as appropriate.

Plan to Attain Essential Elements

PART H.11

Brief Description of Program Deficiency:	D.3.a. Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]

During FY19 and FY20, the agency conducted no barrier analyses. As such no barriers were identified, nor were plans implemented to resolve them.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	09/30/2021	04/24/2021	Establish the capability to effectively tailor action plans to address barriers, if identified.

Responsible Officials

Title	Name	Standards Address the Plan?
Affirmative Employment Program Manager	Paul Boinay	Yes
Acting Associate Administrator, OCR	Aluanda Drain	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Implement procedural changes, if necessary, to prevent future untimely counseling events	Yes		

Accomplishments

Fiscal Year	Accomplishment
2020	An AEPM was hired. At the time that this report was drafted, all FY20 triggers were prioritized for FY21 barrier analysis; however, no barriers had yet been identified. Although no barriers have yet been identified, GSA now has the capability and staff to perform all necessary functions to the appropriate level, should they be.

Plan to Attain Essential Elements

PART H.12

Brief Description of Program Deficiency:	D.3.b. If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]

During FY19 and FY20, the agency conducted no barrier analyses. As such no barriers were identified, nor were plans implemented to resolve them.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	09/30/2021	05/15/2021	Establish capabilities to conduct barrier analyses, identify barriers, and develop and implement elimination/mitigation plans, including meeting target dates for planned activities.

Responsible Officials

Title	Name	Standards Address the Plan?
Affirmative Employment Program Manager	Paul Boinay	Yes
Acting Associate Administrator, OCR	Aluanda Drain	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	Hire an Affirmative Employment Program Manager, conduct barrier analyses, and when barriers are identified, develop and implement relevant action plans.	Yes	09/30/2021	05/15/2021

Accomplishments

Fiscal Year	Accomplishment
2020	An AEPM was hired. At the time that this report was drafted, all FY20 triggers were prioritized for FY21 barrier analysis and several analyses had been initiated; however, no barriers had yet been identified. Although no barriers have yet been identified, GSA now has the capability and staff resources to perform all necessary functions to the appropriate level.

Plan to Attain Essential Elements

PART H.13

Brief Description of Program Deficiency:	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]

During FY19 and FY20, the agency conducted no barrier analyses. As such no barriers were identified, nor were plans implemented to resolve them.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2020	09/30/2021	05/15/2021	Establish capabilities to conduct barrier analyses, identify barriers, develop and implement elimination/mitigation plans, and conduct follow-on reviews to assess the effectiveness of those plans.

Responsible Officials

Title	Name	Standards Address the Plan?
Affirmative Employment Program Manager	Paul Boinay	Yes
Acting Associate Director, OCR	Aluanda Drain	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	Hire an Affirmative Employment Program Manager, conduct barrier analyses, and when barriers are identified, develop and implement relevant action plans. After plans are implemented, conducted follow-on reviews to assess their effectiveness.	Yes	09/30/2021	05/15/2021

Accomplishments

Fiscal Year	Accomplishment
2020	An AEPM was hired. At the time that this report was drafted, all FY20 triggers were prioritized for FY21 barrier analysis; however, no barriers had yet been identified. Although no barriers have yet been identified, GSA now has the capability and staff to perform all necessary functions to the appropriate level, should they be.

Plan to Attain Essential Elements

PART H.14

Brief Description of Program Deficiency:	E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?

During FY20, the agency did not provide timely counseling in all cases. Of 113 cases, 112 (99.1%) were timely processed and 1 was not. This falls short of 100% timeliness; however it is a major improvement over FY19, when 9 cases were untimely.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/01/2021	09/30/2021			Identify and resolve procedural and/or resource issues preventing timely processing of all counseling events.

Responsible Officials

Title	Name	Standards Address the Plan?
Complaints Manager	Sylvia Anderson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Identify and resolve procedural and/or resource issues preventing timely processing of all counseling events.	Yes		

Accomplishments

Fiscal Year	Accomplishment

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/15/2020	09/30/2021			Timely process all counseling events

Responsible Officials

Title	Name	Standards Address the Plan?
Complaints Manager	Sylvia Anderson	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	If applicable, implement procedural modifications to proactively prevent untimely counseling events.	Yes		

Accomplishments

Fiscal Year	Accomplishment

Plan to Attain Essential Elements

PART H.15

Brief Description of Program Deficiency:	E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?

In FY20, GSA untimely processed three Final Agency Decisions (FADs).

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/01/2021	09/30/2021		04/15/2021	Identify and resolve procedural and/or resource issues preventing timely processing of all FADs.

Responsible Officials

Title	Name	Standards Address the Plan?
Firewall Attorney	Karen Williford	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Identify and resolve procedural and/or resource issues preventing timely processing of all FADs.	Yes		04/15/2021

Accomplishments

Fiscal Year	Accomplishment
2020	Analysis of the circumstances of the three untimely FADs determined that two were delayed due to COVID-19, when EEOC requested agencies to temporarily postpone issuing of FADs while new COVID-related business rules were developed and implemented. The third FAD was untimely due to miscommunication regarding how business days and holidays factor into the processing calculation when the complainant fails to elect either a hearing or final agency decision by the last day of the 30-day election period. Clarified procedures have been implemented.

Plan to Eliminate Identified Barriers

PART I.1

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - A4
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Hispanic Males and Hispanic Females both exhibit lower than expected participation in higher General Schedule (GS) grade levels, even when accounting for lower than expected overall workforce participation levels, particularly for Hispanic Females.
STATEMENT OF BARRIER GROUPS:	***Barrier Group*** Hispanic or Latino Males Hispanic or Latino Females
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name** | **Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description

Responsible Official(s)

Title	Name	Standards Address The Plan?

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date

Report of Accomplishments

Fiscal Year	Accomplishments

Plan to Eliminate Identified Barriers

PART I.2

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - A4
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Black Males and Black Females both exhibit lower than expected participation in higher General Schedule (GS) grade levels, even when accounting for much higher than expected overall workforce participation levels for both groups. Among Permanent Hires, within the Total Workforce, among all Mission Critical Occupations, and in all GSA subordinate components, Black Males and Black Females have much higher than expected rates of participation; however, that high participation is limited to the lower GS grade levels, particularly GS11 and lower for Black Males and GS10 and lower for Black Females. With respect to Black Males, they had zero Nominations to three Competitive Develop Programs (CDPs), zero Selections to a fourth, and lower than expected Selections to the remaining three CDPs.
STATEMENT OF BARRIER GROUPS:	***Barrier Group*** Black or African American Males Black or African American Females
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name** | **Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description

Responsible Official(s)

Title	Name	Standards Address The Plan?

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date

Report of Accomplishments

Fiscal Year	Accomplishments

Plan to Eliminate Identified Barriers

PART I.3

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - A4
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	With the exception of White Males, White Females, and Asian Males, all other demographic groups have much lower than expected participation among SES positions.
STATEMENT OF BARRIER GROUPS:	***Barrier Group*** Hispanic or Latino Males Hispanic or Latino Females Black or African American Males Black or African American Females Asian Females Native Hawaiian or Other Pacific Islander Males Native Hawaiian or Other Pacific Islander Females American Indian or Alaska Native Males American Indian or Alaska Native Females Two or More Races Males Two or more Races Females
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name** | **Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description

Responsible Official(s)

Title	Name	Standards Address The Plan?

Plan to Eliminate Identified Barriers

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**

Report of Accomplishments	
Fiscal Year	**Accomplishments**

Plan to Eliminate Identified Barriers

PART I.4

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - A9
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Black Males and Black Females have lower than expected participation among Time-Off Awards of greater than 20 hours. Asian Males have lower than expected participation in all levels of Time-Off Awards.
STATEMENT OF BARRIER GROUPS:	***Barrier Group*** Black or African American Males Black or African American Females Asian Males
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name** | **Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description

Responsible Official(s)

Title	Name	Standards Address The Plan?

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date

Report of Accomplishments

Fiscal Year	Accomplishments

MD-715 – Part J
Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their 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.

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
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 Reasonable Accommodation Coordinator alexandra.vernacchio@gsa.gov

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

Answer Yes

All staff members with disability-related responsibilities 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: 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.

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.

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 of12 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 IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

A. ADVANCEMENT PROGRAM PLAN

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

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
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.

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.

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

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

b. Managers

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

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	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 PWTD among Qualified Internal Applicants was 3.9 percent; however, the rate of PWTD 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 PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

For Executives, the Qualified pool was 2.4 percent PWTD; however, no PWTD were among the Selections. For Managers, the Qualified pool was 3.3 percent PWTD; however, no PWTD 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 V: 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 CFR § 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.

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.

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

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.

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

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.

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

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.

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

GSA'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 VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

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 VII: 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