

GENERAL SERVICES ADMINISTRATION  
Washington, DC 20405

HRM 9410.1C  
May 27, 2021

GSA ORDER

SUBJECT: GSA Workforce Learning and Development Policy

1. Purpose. The purpose of this policy is to:

a. Provide a framework for workforce learning and development at the General Services Administration (GSA), the specific procedures for which shall be developed by the Office of Human Resources Management (OHRM) in conjunction with its internal business partners.

b. Identify the legal foundations for the learning and development policy and establish procedures.

c. Establish policy and assign responsibilities regarding the purpose, development, and maintenance of GSA employees' Individual Development Plans (IDPs), and Executive Development Plans (EDPs) for GSA senior executives.

d. Assign roles and responsibilities for implementing learning and development programs and opportunities for GSA employees.

2. Background. The existing policy (HRM P 9410.A) expires on June 26, 2021. This order revises the policy and updates roles and responsibilities.

3. Cancellation. This policy cancels and supersedes GSA Order HRM P 9410.1A, GSA Workforce Learning and Development Policy, dated June 26, 2014.

4. Applicability and Scope.

a. This policy applies to:

(1) All GSA employees except those otherwise excluded from training under this policy or by Federal regulation or statute;

(2) Federal employees working at GSA on rotation or detail from other agencies, subject to the terms of the appropriate Interagency Agreement; and

(3) Non-GSA employees under contract to GSA (“contractors”) under limited circumstances (see Section 13, Contractor Eligibility for Learning and Development Programs and Courses).

b. This policy does not apply to:

(1) Employee activities unrelated to the identified roles, responsibilities, and duties of a GSA employee; and

(2) The Office of Inspector General (OIG), which has independent personnel authority. See Section 6 of the Inspector General Act of 1978, (5 U.S.C. App.3), as amended (Inspector General is authorized “to select, appoint, and employ such officers and employees as may be necessary for carrying out the functions, powers and duties of the Office of Inspector General”) and GSA Order ADM 5450.39D CHGE 1 GSA Delegations of Authority Manual (Delegations Manual), Chapter 2, Part 1 (“the Inspector General has independent authority to formulate policies and make determinations concerning human capital issues within the [OIG]” and GSA determinations/delegations do not limit that authority). Similarly, GSA specifically recognizes that the Inspector General has independent authority to formulate policies and make determinations concerning training, employee development, and career management. (ADM 5450.39D CHGE 1, Delegations Manual, Chapter 7, Part 1). The OIG, in setting its own training policy, will consider the GSA Order, to the extent that it does not infringe on the Inspector General’s independent personnel authority and does not conflict with other OIG policies.

(3) This policy applies to the Civilian Board of Contract Appeals (CBCA) only to the extent that the CBCA determines it is consistent with the CBCA’s independent authority under the Contract Disputes Act and other authorities and it does not conflict with the CBCA’s policies or the CBCA mission.

## 5. Revisions.

- a. Clarifies employee and supervisor responsibilities.
- b. Adds requirements for attendance and evaluations.
- c. Removes process steps, leaving only policy information.
- d. IDPs are strongly recommended for all employees. EDPs are still required for GSA senior executives.
- e. Increases the cost threshold that triggers the Continued Service Agreement requirement.
- f. Specifies when an SF182 is required.

d. Applies Plain Language Principles.

6. Implementation Action. Implementation of this policy as it affects employees represented by a labor bargaining unit is contingent upon completion of labor relations obligations.

7. Signature.

/S/

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## **GENERAL SERVICES ADMINISTRATION WORKFORCE LEARNING & DEVELOPMENT POLICY**

### **1. Introduction.**

a. GSA is committed to attracting, developing, and retaining a high-performance workforce through training and professional development, consistent with GSA's Human Capital Strategic Plan. GSA increases its efficiency and productivity when employees have the knowledge and abilities to succeed. The complexity and scope of our mission require continual enhancement of general and technical competencies to maintain an agile workforce.

b. All employees shall have access to training, learning, and developmental opportunities to maintain and improve skills and competencies required to perform their job duties successfully and to grow in their professions.

c. OHRM is the policy-setting organization overseeing GSA's workforce learning and development.

d. Within OHRM, the Chief Learning Officer (CLO) oversees GSA's Learning and Development Policy and collaborates with internal business partners to obtain the highest return on learning and development investment by:

(1) Initiating and assessing the design and development of employee and organizational learning and development needs.

(2) Assisting in evaluating the effectiveness of existing learning and development programs in achieving their goals and in advancing GSA's strategic goals.

(3) Providing effective and efficient learning and development opportunities.

### **2. Regulations. This policy is written in accordance with the authority contained in:**

- 5 U.S.C. Chapter 41 - Training
- Title 5 Code of Federal Regulations Part 410, Training
- Title 5 Code of Federal Regulations Part 412, Supervisory, Managerial, and Executive Development
- 5 U.S.C. §3396 - Development for and within the Senior Executive Service
- 5 U.S.C. §5757(a) and GAO B-302548 - Professional Credentials
- 5 U.S.C. §5946 and GAO B-302548 - Membership Fees
- OPM Training and Development Fast Facts

### 3. Eligibility for GSA Learning and Development Programs and Courses.

a. Training Programs. All GSA employees are eligible to participate in training programs or courses sponsored or provided by GSA unless otherwise excluded by statute, regulation, policy, or program limitation. GSA employees seeking to participate in GSA-sponsored programs or courses are required to:

- (1) Meet GSA employment eligibility and performance requirements for participation in the selected program or course;
- (2) Meet all program or course eligibility requirements for participation, including assigned pre-work, required experience, or other prerequisites;
- (3) Meet any additional eligibility restrictions that may apply to some programs or courses, such as competitive requirements; and
- (4) Receive supervisor approval prior to registering for training programs and courses.

b. An approved SF182 (Authorization, Agreement, and Certification of Training form) or a functional equivalent is required for any training that incurs a direct cost to GSA, unless registration is done through the GSA Online University or FAI-CSOD (acquisition training) systems. Any employee who enrolls without an approval may be responsible for the total cost of the training. An SF182 is not required for training that only incurs an indirect cost, such as travel.

c. Funding. In accordance with this policy, funding of employee training is at the discretion of GSA.

d. GSA Sponsored Training Types. It is the employee's responsibility to ensure they are eligible and approved to attend training. GSA may only fund the following types of training:

(1) Mandatory Training. Training that is mandated by an executive order, government-wide directive, federal statute, or regulation for all employees or specific groups (examples: Annual Ethics training; IT Security Awareness). Employees and Supervisors must take the mandatory training within GSA's established timeframe.

(2) Required Training. Training approved by the GSA Administrator to be included as mandatory training absent a law, rule, or regulation based on GSA's determined need for an employee to take the training. (example: Telework). Employees and Supervisors must take the required training within GSA's established timeframe.

(3) Job Related Training. Training directly related to the employee's current position, such as technical training and related academic coursework.

(4) Career Development. Training which may prepare the employee to take on a future position of increased responsibility in support of the GSA mission. GSA will design and implement leadership development programs integrated with the employee development plans, programs, and strategies required by 5 CFR §410.201, and that foster a broad agency and Governmentwide perspective.

#### 4. Individual Development Plans (IDPs).

##### a. Documentation

(1) GSA strongly encourages all GSA employees to create and maintain an up-to-date IDP.

(2) Approval of an IDP does not guarantee funding for the elements of that IDP.

(3) IDPs developed for bargaining unit employees must be in compliance with the GSA/American Federation of Government Employees (AFGE) National Agreement and the GSA/National Federation of Federal Employees (NFFE) National Agreement, as appropriate. More information can be found on GSA Insite [Labor/Management Relations](#) page.

(4) Guidance on how to create an IDP, roles, responsibilities, and timing can be found on the GSA Insite IDP page.

b. Development Discussion Between Supervisor and Employee. At a minimum, the supervisor and employee shall discuss the employee's professional development at the mid-year and annual performance reviews, at which time both parties will discuss goals and developmental opportunities for that review period. Progress is not a component of the performance review.

##### c. Requesting Training.

(1) GSA has invested in superior on-line training for a wide range of subjects important for personal and professional development. Employees are encouraged to select and take advantage of training opportunities already resident and provided on OLU.

(2) Employees must submit an SF182 or a functional equivalent to request training that imposes a direct cost to GSA. No training may be purchased until the SF182 or functional equivalent is approved by the organizationally established approval chain.

(3) An SF182 is not required for training that does not impose a direct cost to GSA or has registration managed through the OLU or FAI-CSOD (acquisition) systems.

5. Employee Obligations for Participation in GSA Learning and Development Courses and Programs.

a. Employees must consider suitable low-cost and no-cost training before pursuing more expensive options.

b. By registering for GSA-sponsored training, the employee agrees to:

(1) Attend a minimum of 90% of the scheduled training hours.

(2) Complete all related work assignments (for example pre-work and team projects).

(3) Receive a passing grade as applicable (also see Section 7, Tuition Assistance and Academic Degree Programs).

(4) Training scheduled outside of an employee's normal tour of duty does not entitle an employee to overtime. The employee agrees to adjust their work schedule as necessary. For training not available during work hours or requiring travel, please refer to the GSA Time and Attendance Policy.

(5) Receive supervisor approval prior to cancelling or withdrawing.

(6) Complete a course evaluation, if provided.

(7) Complete the Continued Service Agreement, if applicable (see Section 10, Continued Service Agreements).

c. Employees may be held financially responsible for failure to meet these obligations. (5 CFR §410.405).

6. Supervisor Responsibilities.

1. All supervisors must take mandatory training. New supervisors must complete the new supervisor training within the first year of appointment. Experienced supervisors must complete the mandatory refresher training every three years. OHRM will provide guidance directly to the supervisors. (5 CFR §412.202(b))

2. Supervisors are the primary approving authority of employee training. Supervisors are responsible for:

a. Ensuring the employee has considered suitable no-cost and low-cost learning and development options before pursuing more expensive options;



b. Ensuring the training they approve falls within the training types listed under Section 3, Eligibility;

c. Approving training prior to the employee registering;

d. Approving employee cancellations or withdrawals, balancing the cost to GSA and the taxpayer against the reason for cancellation;

e. Adjusting an employee's work schedule, if necessary. Training scheduled outside of an employee's normal tour of duty does not entitle an employee to overtime. For training not available during work hours or requiring travel, please refer to the GSA Time & Attendance Policy;

f. Ensuring that the Continued Service Agreement (if applicable) is completed prior to the start of the training (see Section 10, Continued Service Agreements);

g. Tracking the Continued Service Agreement expiration date and notifying OHRM during off-boarding if the employee plans to leave prior to the end of their obligated service period; and

h. Ensuring the employee attends training as scheduled and meets all training requirements.

## 7. Tuition Assistance and Academic Degree Programs.

### a. Academic Training.

(1) All academic training (5 USC §4107) must be provided by a college or university that is accredited by a regional, national, or international accrediting organization recognized by the U.S. Department of Education.

(2) Federal regulation (5 USC §4107(b)(4)) requires that online options for academic training must be considered and used to the greatest extent practicable.

(3) Employees must complete all academic training with a minimum grade of "B" for each course.

b. Academic Courses. Individual courses may be funded if the course is directly related to the employee's current or planned official duties and must not be for the sole purpose of:

(1) Providing an employee the opportunity to obtain an academic degree; or

(2) Enabling the employee to qualify for appointment to a particular position for which the academic degree is a basic requirement.

c. Academic Degrees.

(1) GSA does not pay for academic degrees unless the degree is part of a formal GSA program that meets the legal requirements of 5 U.S.C. §4107(a):

- (a) Meets an identified GSA training need; or
- (b) Resolves an identified GSA staffing problem; or
- (c) Accomplishes goals in GSA's strategic plan.

(2) GSA-approved academic degree programs must be:

- (a) Part of a formal, planned, systemic, and coordinated GSA employee development program.
- (b) Administered in a manner consistent with Merit System Principles enumerated in 5 U.S.C. §2301 and 5 U.S.C. §7201(b)).
- (c) Approved by OHRM for compliance.

8. Certifications, Accreditations, and Licenses. Under [5 U.S.C. §5757\(a\)](#) and GAO B-302548, GSA may pay only for professional licenses or certifications required to practice a particular profession. Reimbursement authorization for a new certification is usually only applicable when position requirements are changed formally on an agency-wide or government-wide basis. Below are common examples:

- a. GSA may pay for annual licensing fees for GSA attorneys, because those fees are necessary for the attorney to continue to practice at the agency and are a formal requirement for the job.
- b. If an employee wishes to take classes in preparation for a project management certification because they have project management responsibilities in their current position, GSA may pay for the cost of the training classes but may not pay any fees associated with the certification exam itself, which is usually a separate expense.
- c. In rare instances, vendors who provide both training and certification in a field may provide a certification as a part of job-related training and may refuse or be unable to separate the fee for certification from the fee for training. In such cases, certification is incidental to, and indivisible from, the training and will not prevent GSA from paying or reimbursing for that training.

9. Conferences. All conference attendance is subject to the GSA Office of Administrative Services Conference Attendance policies. If the primary purpose of the conference is training for GSA employee(s), then the conference is also within the scope of this policy.

## 10. Continued Service Agreements (CSAs).

a. Employees who are selected to participate in training that costs over \$7,000 per class must enter into an agreement to continue in the service of GSA for a minimum of 3 times the length of the training program (5 U.S.C §4108). The amount due shall be prorated according to the service agreement schedule listed on the CSA form. This continued service requirement is waived if the employee is involuntarily separated from the Federal Government.

(1) Some programs may require a longer continued service period which will be determined by the Program Manager and approved by the Chief Human Capital Officer (CHCO).

(2) The expiration date of the CSA will be determined by the Program Manager or Supervisor and included on the CSA form.

(3) The CSA must be signed electronically by both the employee and supervisor before the employee may attend the program.

b. If an employee voluntarily separates from GSA within the continued service period covered by the CSA, the employee will repay the amount the Government paid for that training on a prorated basis according to the service agreement schedule listed on the CSA form. The cost, not including salary, will be withheld from any monies owed to the employee or will be recovered by such other methods as are approved by law.

c. Exceptions to service requirements outlined by the CSA or other obligations established in this section may be made under extraordinary circumstances. Exceptions must be:

(1) Requested in writing accompanied by documentation or other evidence detailing the extraordinary circumstances that justify the request, and

(2) Approved and signed by the GSA CHCO.

## 11. Membership in Professional Associations.

a. Agency Memberships. GSA may pay for agency memberships to professional associations where memberships advance GSA goals or meet identified GSA learning and development needs.

b. Individual Memberships. Federal law under ([5 U.S.C. §5946](#)) generally prohibits GSA from paying for or reimbursing the cost of professional association memberships for individuals.

(1) Even if the individual membership would reduce the cost of training the employee will otherwise take as a non-member, GSA is still prohibited from paying for individual membership (GAO B-302548).

(2) GSA may pay the cost of individual membership in an association only if the membership fee is indivisible from the cost of an approved training course or program in which an employee participates.

For example, if an employee takes a course that includes a one-year individual membership as part of the course price, and the association will not reduce the cost of that course by the price of membership in order to exclude that benefit, then GSA may still pay for the cost of that training.

## 12. Senior Executive Service (SES).

a. Executive Development Plans (EDPs) are required by law (5 U.S.C. §3396) for SES employees. Guidance on how to create an EDP, roles, responsibilities, and timing can be found on the GSA Insite IDP page.

### b. Sabbaticals.

(1) SES career appointees may request sabbaticals to engage in study or uncompensated work that will enhance job performance per [Section 5 USC §3396](#).

(2) A sabbatical may be granted by the GSA Administrator to any GSA SES career appointee who has completed seven years of service in an SES position, or an equivalent civil service position at least two years of which were in SES. In addition, the appointee cannot be eligible for voluntary retirement with a right to an immediate annuity.

(3) Senior executives accepting a sabbatical must sign a CSA to serve in the civil service upon completion of the sabbatical for a period of two consecutive years. If the career appointee fails to meet this agreement, the appointee will be liable to GSA for all expenses, including salary, paid by the Government to or on behalf of the employee during the sabbatical. Repayment may be waived for sufficient reason as determined by the Administrator.

## 13. Contractor Eligibility for Learning and Development Programs and Courses.

a. Contractors may only participate in GSA-sponsored training for GSA-specific knowledge or skills they are not expected or able to bring to the job (such as GSA IT Security Awareness and Privacy Act Training). This includes rules, regulations, policies, practices, procedures, programs, and/or systems that are unique to GSA.

b. GSA may provide training to contractor employees if the contract requires it, as deemed necessary by the GSA Contracting Officer and/or Contracting Officer's

Representative, and does not otherwise create a conflict or give the appearance of favoring a contractor.

14. Training Management, Analysis, and Recordkeeping.

a. Training Management. OHRM will utilize the learning management system to manage the training function, including the recording and retrieval of training information.

b. Analysis. The CLO will evaluate existing OHRM administered training programs annually to determine how well GSA's programs contribute to mission accomplishment and meet organizational goals. The CLO will provide a framework for the development of training effectiveness measures across GSA. (5 C.F.R. § 410.202)

c. Recordkeeping. In accordance with National Archives and Records Administration retention and disposal schedules, OHRM will retain training records utilizing the [GSA Records Retention Schedule](#).

15. Minimizing Training Costs and Avoiding Duplication of Training.

a. Every effort should be made to minimize training costs and to avoid duplication of offerings across GSA while meeting training needs of individual offices/organizations within GSA.

b. GSA supervisors and employees should consider e-learning courses and online resources as a first choice for learning and development, if such courses meet the needs of the organization.

c. GSA supervisors and employees should consider OHRM sponsored learning and development offerings and programs prior to pursuing organization-specific initiatives that incur a cost to GSA.