U.S. General Services Administration (GSA)

GSA Order: GSA Workforce Learning and Development Policy

HRM 9410.1D
Office of Human Resources Management
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Purpose:

1. 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.
2. Identify the legal foundations for the learning and development policy and establish procedures.
3. 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.
4. Assign roles and responsibilities for implementing learning and development programs and opportunities for GSA employees.

Background:

The existing policy (HRM 9410.1C) expires on January 31, 2029. This order revises the policy to strengthen governance for training and development across GSA. The updates also align workforce development activities with enterprise training coordination and mission priorities.

Applicability:

1. This policy applies to:

1.1. All GSA employees except those otherwise excluded from training under this policy or by Federal regulation or statute;

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

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

2. This policy does not apply to:

2.1. Employee activities unrelated to the identified roles, responsibilities, and duties of a GSA employee; and

2.2. 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.

Cancellation:

This policy cancels and supersedes GSA Order (HRM 9410.1C), GSA Workforce Learning and Development Policy, dated May 27, 2021.

Summary of Changes:

1. Adds a new section on Workforce Capability Planning to align training and development activities with workforce capability needs, mission priorities, and emerging skill requirements.

2. Updates the Individual Development Plan (IDP) section to require employees to maintain an IDP, clarify expectations for development discussions between supervisors and employees, and introduce structured career conversations to support career growth and workforce capability development.

3. Establishes GSA’s Learning Management System (LMS) as the official system of record for training, requiring GSA-sponsored training activities to be recorded in the LMS to ensure accurate reporting and workforce development data.

4. Adds requirements for the use of accurate Sub Object Class (SOC) codes in GSA's financial system when recording training expenditures to improve financial transparency, reporting accuracy, and alignment with OCFO guidance.

5. Strengthens enterprise training governance and centralized coordination by requiring training requests exceeding $10,000 that involve external procurement to be submitted through the centralized training function for economies of scale opportunities.

6. Clarifies supervisory responsibilities for approving training and development, including approval prior to employees applying or registering for training and ensuring Continued Service Agreements align with SF-182 training requests.

7. Updates language throughout the policy to reflect GSA's centralized training model, modern learning practices, and the role of enterprise training resources such as GSA's LMS.

8. Updates terminology and administrative references, including the policy signature line and other editorial revisions to improve clarity and consistency.

Roles and Responsibilities:

1. **Office of Human Resources Management (OHRM)**

   The Office of Human Resources Management serves as the agency's lead organization for enterprise learning and workforce development and is responsible for administering this Order.

   Responsibilities include:

   - Developing, maintaining, and interpreting GSA training and development policy.
   - Establishing enterprise-wide learning strategies, standards, and governance.
   - Managing the agency's official learning management system and training records.
   - Providing enterprise training programs, leadership development programs, and mandatory training coordination.
   - Monitoring compliance with this Order and applicable Federal statutes, regulations, and government-wide guidance.
   - Developing enterprise reporting and workforce learning analytics.

2. **Services and Staff Offices (SSOs)**

   Each Service and Staff Office is responsible for implementing this Order within its organization.

   Responsibilities include:

   - Identifying workforce capability needs aligned with mission priorities.
   - Planning and funding organization-specific training.
   - Ensuring employees complete required mandatory training.
   - Supporting employees in developing Individual Development Plans (IDPs).
   - Maintaining internal processes that comply with this Order.
   - Designating appropriate training points of contact when applicable.
   - Coordinating with OHRM on enterprise learning initiatives and reporting requirements.

3. **Supervisors and Managers**

   Supervisors and managers are responsible for developing their workforce and ensuring employee participation in required learning activities.

   Responsibilities include:

   - Conducting regular career development discussions with employees.
   - Reviewing and approving Individual Development Plans (IDPs) in accordance with agency policy.
   - Identifying developmental opportunities that support organizational and employee performance.
   - Approving training requests based on mission needs, available funding, and applicable policies.
   - Monitoring completion of mandatory training.
   - Supporting transfer of learning and application of newly acquired knowledge and skills in the workplace.

4. **Employees**

   Employees are responsible for actively participating in their own professional development.

   Responsibilities include:

- Developing and maintaining an Individual Development Plan (IDP) as required by agency policy.
- Completing mandatory training by established deadlines.
- Requesting training that supports mission requirements and career development.
- Applying knowledge and skills gained through training to improve job performance.
- Complying with all agency procedures governing training requests and participation.

5. Training Coordinators

Training Coordinators support implementation of this Order within their organizations.

Responsibilities include:

- Serving as the primary liaison for training between their organization and OHRM.
- Assisting employees and supervisors with training procedures.
- Supporting training planning, coordination, and communications.
- Monitoring organizational training completion and compliance.
- Assisting with training data validation and reporting.
- Supporting workforce development planning activities.

6. Budget Officials and Financial Management Staff

Budget officials support execution of this Order by ensuring appropriate stewardship of training funds.

Responsibilities include:

- Managing training funds in accordance with applicable appropriations law and agency financial policies.
- Coordinating with program offices regarding available training resources.
- Applying appropriate training-related Budget Object Class (BOC) codes and other financial coding requirements.
- Supporting financial reporting related to agency training expenditures.

7. Enterprise Training Governance Council (or equivalent governance body)

The Enterprise Training Governance Council provides strategic oversight of agency-wide learning and development initiatives to ensure training investments

support GSA's mission, workforce capability priorities, and strategic objectives. The Council serves as an advisory and governance body to promote consistency, transparency, and effective stewardship of enterprise training resources.

Responsibilities include:

- Reviewing enterprise-wide and high-cost training investments in accordance with this Order to ensure alignment with agency priorities and responsible stewardship of resources.
- Promoting consistency in the planning, delivery, and evaluation of training and development programs across Services and Staff Offices.
- Supporting implementation of the agency's workforce capability planning strategy by identifying common competency gaps and recommending enterprise learning solutions.
- Encouraging collaboration among Services and Staff Offices to reduce duplication of training and maximize the use of enterprise learning resources.
- Reviewing workforce learning metrics and evaluation data to assess the effectiveness and impact of enterprise training investments.
- Recommending improvements to enterprise learning policies, governance, and business processes based on workforce data, customer feedback, and changing mission requirements.

Signature

/S/_____ 7/7/2026_____
Arron E. Helm Date
Chief Human Capital Officer
Office of Human Resources Management

Table of Contents

1. Introduction 8
2. Authorities 8
3. Eligibility for GSA Learning and Development Programs and Courses 9
    3.1. Training Programs 9
    3.3. Funding 9
    3.4. GSA Sponsored Training Types 9
4. Workforce Capability Planning 10
5. Individual Development Plans (IDPs) 11
        5.1.1. Documentation 11
        5.1.2. Development Discussion Between Supervisor and Employee 11
        5.1.3. Structured Career Conversations 12
        5.1.4. Alignment Between Career Conversations and IDPs 12
    5.2. Requesting Training 12
    5.3. Employee Obligations for Participation in GSA Training and Programs 13
6. Supervisor Responsibilities 13
7. Tuition Assistance and Academic Degree Programs 15
    7.1. Academic Training 15
    7.2. Academic Courses 15
    7.3. Academic Degrees 15
8. Certifications, Accreditations, and Licenses 16
9. Conferences 16
10. Continued Service Agreements (CSAs) 16
11. Membership in Professional Associations 17
12. Senior Executive Service (SES) 18
    12.2. Sabbaticals 18
13. Contractor Eligibility for Learning and Development Programs and Courses 18
14. Training Management, Analysis, and Recordkeeping 19
15. Minimizing Training Costs and Avoiding Duplication of Training 19
16. Use of Appropriate Sub Object Class Codes 20
17. Recording and Tracking Training in GSA's Learning Management System 20

1. Introduction

1.1. GSA is committed to attracting, developing, and retaining a high-performance workforce through training and professional development, consistent with GSA's Human Capital Operating 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 leadership and technical competencies to maintain an agile workforce.

1.2. Employees will have access to training, learning, and developmental opportunities to enhance knowledge and improve skills and competencies required to successfully perform their job duties and grow in their professions.

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

1.4. 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:

1.4.1. Initiating and assessing the design and development of employee and organizational learning and development needs.

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

1.4.3. Providing effective and efficient learning and development opportunities.

2. Authorities

2.1. This policy is written in accordance with the authority contained in:

2.1.1. 5 U.S.C. Chapter 41 - Training

2.1.2. Title 5 Code of Federal Regulations Part 410, Training

2.1.3. Title 5 Code of Federal Regulations Part 412, Supervisory, Management, and Executive Development

2.1.4. 5 U.S.C. §3396 - Development for and within the Senior

Executive Service

2.1.5. 5 U.S.C. §5757(a) - Professional Credentials

2.1.6. 5 U.S.C. §5946 and GAO B-302548 - Membership Fees

2.1.7. OPM Training and Development Fast Facts

3. Eligibility for GSA Learning and Development Programs and Courses

3.1. Training Programs

GSA employees may participate in organizational learning programs and training courses sponsored or provided by GSA, unless excluded by statute, regulation, policy, or program limitation. GSA employees seeking to participate in GSA-sponsored programs or courses are required to:

3.1.1. Meet GSA employment eligibility and performance requirements for participation in the selected program or course;

3.1.2. Meet all program or course eligibility requirements for participation, including assigned pre-work, required experience, or other prerequisites; and

3.1.3. Meet any additional eligibility restrictions that may apply to some programs or courses, such as competitive requirements.

3.2. 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 GSA's Learning Management System or the federal government acquisition training system. 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.

3.3. Funding

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

3.4. 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:

3.4.1. **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.

3.4.2. **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.

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

3.4.4. **Career and Leadership 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. Workforce Capability Planning

4.1. To ensure the GSA workforce has the skills needed to support mission priorities, GSA uses a workforce capability planning approach to identify, develop, and strengthen critical skills across the organization.

4.2. Workforce capability planning aligns employee development with agency priorities, emerging mission requirements, and future workforce needs. This approach supports GSA's commitment to championing career growth and strengthening workforce capability to meet current and future mission demands.

4.2.1. Workforce capability planning includes:

4.2.1.1. Identifying workforce capability gaps through employee feedback, workforce analytics, training data, and organizational assessments

4.2.1.2. Aligning training and development programs with mission priorities and strategic initiatives

4.2.1.3. Supporting career growth through Individual Development Plans (IDPs), mentorship, training programs, and developmental assignments

4.2.1.4. Providing supervisors and employees with tools and resources to support continuous learning and professional development

4.2.1.5. Insights gathered through workforce assessments, employee feedback, and development planning activities that inform GSA's training priorities, leadership development programs, and workforce capability initiatives.

5. Individual Development Plans (IDPs)

5.1. All employees are required to develop and maintain an up-to-date Individual Development Plan (IDP). IDPs support employee career growth by helping employees and supervisors identify development goals, skill gaps, and opportunities for professional growth aligned with both individual career aspirations and organizational needs. IDPs serve as a tool to guide employee development and support workforce capability planning across the agency.

5.1.1. Documentation

5.1.1.1. All GSA employees are expected to create and maintain an Individual Development Plan in the agency's learning management system or approved platform.

5.1.1.2. IDPs must be reviewed and updated at least annually to reflect current development goals and priorities.

5.1.1.3. Approval of an IDP does not guarantee funding for the training, developmental assignments, or other activities identified in the plan.

5.1.1.4. Guidance on creating and maintaining an IDP, including roles, responsibilities, and timelines, can be found on the GSA InSite IDP page.

5.1.2. Development Discussion Between Supervisor and Employee

5.1.2.1. Supervisors and their employees should discuss professional development on a regular basis to support career growth and capability development. At a minimum, supervisors and employees must discuss development goals during the mid-year and annual performance reviews.

These discussions should focus on developmental opportunities, career interests, and skill development for the upcoming performance period. Development discussions are intended to support employee growth and are not a component of the employee's performance rating.

5.1.3. Structured Career Conversations

5.1.3.1. Supervisors play a key role in supporting employee development. To encourage continuous growth and career planning, supervisors are expected to hold regular career conversations with employees throughout the year.

5.1.3.1.1. At a minimum, supervisors should:

5.1.3.1.1.1. Conduct at least four career development conversations annually

5.1.3.1.1.2. Discuss career aspirations and development goals

5.1.3.1.1.3. Identify opportunities for training, mentorship, or developmental assignments

5.1.3.1.1.4. Explore opportunities for skill development and exposure to new work

5.1.3.1.1.5. Discuss readiness for advancement and career mobility interests

5.1.4. Alignment Between Career Conversations and IDPs

5.1.4.1. Information discussed during career conversations should inform the employee's Individual Development Plan. Supervisors and employees should ensure that development goals identified during these discussions are reflected in the IDP to support both individual career growth and the agency's workforce capability needs.

5.2. Requesting Training

5.2.1. GSA provides a wide range of high-quality online training courses through GSA's Learning Management System (LMS) designed for both personal and professional growth. Employees are encouraged to utilize these training opportunities available on the LMS.

5.2.2. 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.

5.2.3. An SF182 is not required for training that does not impose a direct cost to GSA or has registration managed through the GSA Learning Management System, or the federal government acquisition system.

5.3. Employee Obligations for Participation in GSA Training and Programs

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

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

5.3.2.1. Attend a minimum of 90% of the scheduled training hours.

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

5.3.2.3. Devote sufficient time and effort to receive a passing grade as applicable (also see Section 7, Tuition Assistance and Academic Degree Programs).

5.3.2.4. Adjust their work schedule as necessary for training not available during work hours or requiring travel. Training scheduled outside of an employee's normal tour of duty does not entitle an employee to overtime. Please refer to the GSA Time and Attendance Policy.

5.3.2.5. Receive supervisor approval prior to cancelling or withdrawing.

5.3.2.6. Complete a course evaluation, if provided.

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

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

6. Supervisor Responsibilities

6.1. 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. (5 CFR §412.202(b)) OHRM will provide guidance directly to the supervisors.

6.2. Supervisors are the primary approving authority of employee training and development. Supervisors are responsible for:

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

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

6.2.3. Approving training prior to the employee applying and/or registering;

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

6.2.5. 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;

6.2.6. Ensuring that the Continued Service Agreement (if applicable) matches the SF-182 Training Request Form (or other financial document used) for training program name, dates and is completed prior to the start of the training (see Section 10, Continued Service Agreements)

6.2.7. 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

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

6.2.9. Any adjustments to the employee's training to include changes in training program or changes in training program dates may void the current SF-182 Training Request Form and require a new SF-182 Training Request Form be initiated.

7. Tuition Assistance and Academic Degree Programs

7.1. Academic Training

7.1.1. 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.

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

7.1.3. Employees must complete all academic training with a minimum grade of “B” for each course.

7.2. Academic Courses

7.2.1. 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:

7.2.1.1. Providing an employee the opportunity to obtain an academic degree; or

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

7.3. Academic Degrees

7.3.1. 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), including:

7.3.1.1. Meeting an identified GSA training need; or

7.3.1.2. Resolving an identified GSA staffing problem, mission critical need; or

7.3.1.3. Accomplishing goals in GSA’s strategic plan.

7.3.1.4. GSA-approved academic degree programs must be:

7.3.1.4.1. Part of a formal, planned, systemic, and coordinated GSA employee development program.

7.3.1.4.2. Administered in a manner consistent with Merit System Principles enumerated in 5 U.S.C. §2301 and 5 U.S.C. §7201(b)).

7.3.1.4.3. Approved by OHRM for compliance.

8. Certifications, Accreditations, and Licenses

8.1. 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:

8.1.1. 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.

8.1.2. 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 will not pay any fees associated with the certification exam itself, which is usually a separate expense.

8.1.3. 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)

10.1. 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).

10.1.1. 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).

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

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

10.2. 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. The continued service requirement is waived if the employee is involuntarily separated from the Federal Government.

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

10.3.1. Requested in writing accompanied by documentation or other evidence detailing the extraordinary circumstances that justify the request, and

10.3.2. Approved and signed by the GSA CHCO.

11. Membership in Professional Associations

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

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

11.2.1. 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 the individual membership (GAO B-302548).

11.2.2. 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)

12.1. Executive Development Plans (EDPs) are required for SES employees. Guidance on how to create an EDP, roles, responsibilities, and timing can be found on the GSA Insite IDP page.

12.2. Sabbaticals

12.2.1. SES career appointees may request sabbaticals to engage in study or uncompensated work that will enhance job performance per 5 USC §3396.

12.2.2. 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.

12.2.3. 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

13.1. 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.

13.2. 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

14.1. **Training Management.** OHRM will utilize the Learning Management System to manage the training function, including the recording and retrieval of training information.

14.2. **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)

14.3. **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

15.1. 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.

15.2. 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.

15.3. 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.

15.4. All training requests that require external procurement (e.g., training contracts or vendor agreements) exceeding $10,000 shall be submitted through the centralized training function. This requirement aims to enhance any coordination needed with the acquisition office, achieve economies of scale, ensure consistency, and enhance efficiency in

GSA-wide training operations.

15.5. All requests must accompany a business case and requirements.

15.6. The centralized function will review, and provide market research options to ensure alignment with policy, before referring to the Acquisition Office.

15.7. The centralized function does not execute procurement but ensures readiness in preparation for the acquisition process if needed.

16. Use of Appropriate Sub Object Class Codes

When reconciling training expenses in GSA's financial system, all program offices and training coordinators must use the appropriate training related Sub Object Class (SOC) codes as published by the Office of the Chief Financial Officer (OCFO). These codes ensure accurate reporting, alignment with federal workforce data requirements, and compliance with financial and training policies. Offices are responsible for reviewing and applying the most current list of SOC codes issued by OCFO when recording training activities.

17. Recording and Tracking Training in GSA's Learning Management System

17.1. All GSA-sponsored training activities must be recorded in GSA's Learning Management System (LMS). The LMS is the official system of record for employee training and serves as the authoritative source for workforce development data.

17.2. It is strongly encouraged to use the LMS for training registration, tracking and training completion. While alternative tools (such as Google Forms or other registration methods) may be used to facilitate initial registration or manage logistics, they do not replace the requirement to document training completion in the LMS. Supervisors, training coordinators, and program managers are responsible for ensuring that all training completions are accurately entered and updated in the LMS.

17.3. Failure to record training completions in the LMS may result in incomplete employee training histories, hinder compliance reporting, and create inconsistencies in agency-wide training records.