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

Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715) requires each federal agency to assess its employment policies, procedures, and practices for alignment with equal employment opportunity (EEO) laws and principles. The GSA MD-715 Report documents agency progress toward meeting those and other EEO obligations, including complying with MD-715.[1]

While the MD-715 Report is a regulatory requirement, the evaluation process it reflects helps GSA:

- **Improve Workforce Practices**: By systematically reviewing employment policies, practices, and procedures, GSA identifies compliance gaps, procedural inconsistencies, and areas requiring corrective action to ensure alignment with merit system principles and EEO requirements.

- **Support Informed Decision-Making**: Workforce data analysis conducted through the MD-715 process equips GSA leadership with actionable, evidence-based insights to guide recruitment, development, and retention strategies to ensure GSA has a mission-ready workforce.

- **Enhance Accountability**: The process highlights both compliance strengths and areas for improvement, enabling targeted oversight, transparency, and ongoing improvement of EEO compliance and workforce management practices.

- **Proactively Prevent Workplace Discrimination:** MD-715 assessments support implementation of policies and procedures that mitigate risk, prevent discriminatory barriers, and promote fair treatment in accordance with federal anti-discrimination laws.

The Role of Workforce Data
The MD-715 Report contains extensive analysis of workforce data spanning the entire employment lifecycle, such as hiring, promotions, retention, and applicant flow.

What is Barrier Analysis?
Barrier analysis is the systematic process of identifying, assessing, and eliminating barriers to equal employment opportunity. It involves:

- **Identifying Triggers**: Detecting statistical anomalies or patterns in workforce data and inputs from other sources of information that may indicate challenges or inconsistencies.

- **Exploring Root Causes**: Investigating relevant policies, procedures, and practices to determine whether they may be contributing factors or barriers to EEO.

- **Recommending Solutions**: Recommending data-informed solutions to eliminate discriminatory barriers and support effective human capital strategies.

Workforce Participation Goals:
In addition to barrier identification and elimination, MD-715 and federal regulations require agencies to establish annual goals for workforce representation of people with disabilities and to take steps to achieve those goals. Information about GSA's strategies for recruiting, hiring, advancing, and retaining qualified employees with disabilities is in Part J of the GSA MD-715 Report.

If you have any questions about MD-715, GSA annual MD-715 Reports, or associated barrier analysis efforts, please contact the Office of Civil Rights at AEP@gsa.gov.

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[1] Annual GSA MD-715 Reports are compiled in accordance with EEOC Instructions to Federal Agencies for EEO MD-715 and submitted in accordance with EEOC Federal Sector EEO Portal (FedSEP) requirements.

Redaction Notice

Portions of this report have been redacted to comply with:

1. Office of Personnel Management (OPM) guidance ([Merit Hiring Plan memo](#) (May 29, 2025), which states, "*agencies should take the following steps: Cease disseminating information regarding the composition of the agency's workforce based on race, sex, color, religion, or national origin.*"

2. EEOC clarifying guidance that "*agencies should follow the OPM memo's direction…and should not publicly or internally disseminate workforce composition demographics*. This is consistent with EEOC guidance. Our regulations at 29 C.F.R. §1614.601(e) provides that '[t]he agency may use the data only in studies and analyses which contribute affirmatively to achieving the objectives of the equal employment opportunity program.'" [emphasis added]

The complete Fiscal Year 2024 GSA Annual Agency EEO Program Status Report (including mandatory workforce analyses and specified demographic data) was submitted to the EEOC in accordance with current EEOC regulations, MD-715, and associated guiding instructions.

Accessibility Notice

This document includes EEOC MD-715 templates that are formatted in accordance with EEOC Instructions to Federal Agencies for EEO MD-715, as well as other figures that may not be fully accessible using assistive technology.

If you have any questions or would like an explanation of any of the contents of the report, please contact the Office of Civil Rights at AEP@gsa.gov.

Equal Employment Opportunity Program Status Report for Fiscal Year 2024

Table of Contents

EEOC MD-715 Overview

This Equal Employment Opportunity (EEO) Program Status Report for Fiscal Year 2024 (FY 2024) is submitted in accordance with the Equal Employment Opportunity Commission's (EEOC) Management Directive 715 (MD-715) and related EEOC guidance.[1] The purpose of MD-715 is to ensure that all federal employees and applicants for employment enjoy equal opportunity in the federal workplace, regardless of race, sex, national origin, color, religion, disability, or reprisal.

In accordance with MD-715, the U.S. General Services Administration (GSA) is required to:

- Annually assess its compliance with 156 measures (Part G), which evaluate adherence to EEO laws, regulations, and other directives;

- Develop and implement corrective action plans (Part H) to address any compliance deficiencies;

- Proactively prevent employment discrimination by identifying and eliminating institutional, attitudinal, or physical barriers that limit equal opportunity (Parts I and J);[2] and

- Maintain an Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities (AAP for PWD) (Part J).[3]

This MD-715 Report reflects GSA's performance and progress throughout FY 2024. Its format, structure, and contents - including Parts A thru J, data tables A-1 thru B-9,[4] and all supplemental documents - are prescribed by EEOC instructions and the Federal Sector EEO Portal (FedSEP).[5]

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[1] *See* EEOC MD-715 (Oct. 1, 2003) and Instructions to Federal Agencies for EEO MD-715. Per EEOC's federal sector regulations at 29 CFR § 1614, MD-715 is binding on all Executive agencies (including GSA). *See* 29 CFR § 1614.103(b)(2) ("This part applies to…Executive agencies as defined in 5 U.S.C. 105"); *see also* 29 CFR § 1614.102(e) ("Agency programs *shall* comply with this part and the Management Directives and Bulletins that the Commission issues") (emphasis added).

[2] MD-715 and its implementing instructions are materially consistent with Executive Order 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity, each serving to advance the federal government's mandate to prevent and remedy illegal discrimination.

[3] *See* 29 CFR § 1614.203(d) ("Pursuant to 29 U.S.C. 791, each agency shall…implement a Plan…to provide adequate hiring, placement, and advancement opportunities for individuals with disabilities").

[4] The annual MD-715 data tables are not included in this report, as they contain Personally Identifiable Information. Workforce and applicant data are uploaded annually to EEOC via the FedSEP application.

[5] *See* FedSEP.

GSA FY 2024 MD-715 Report Overview

This comprehensive MD-715 Report documents GSA's compliance with EEO requirements and progress on key mandatory activities, including:

- Resolution of previously identified deficiencies;

- Completion of barrier analyses (root cause investigations);

- Elimination of identified barriers; and

- Execution of lawful affirmative actions to support employees and applicants with disabilities.

The report components are as follows:

Parts A – D: Provide general agency information.

Part E: Executive summary including workforce data analyses, key findings, accomplishments, future corrective plans, and progress on previously reported corrective plans.

Part G: Evaluates compliance with 156 measures. GSA reported 19 deficiencies in FY 2023 and 33 in FY 2022. Of the FY 2023 deficiencies, 9 were entirely resolved in FY 2024 and progress was made on 7 more. Ten deficiencies remain, primarily involving:

- Untimely processing of reasonable accommodation requests;

- Untimely initial inquiries into allegations of harassment;

- Shortfalls in employee and applicant flow data; and

- Agency investigation and elimination of identified barriers.

Part H: Includes 6 corrective plans addressing all 10 remaining deficiencies.

Part I: Reports on barrier elimination efforts related to race, national origin (ethnicity), and sex. No new barriers were identified in FY 2024 in these categories.

Part J: Describes progress under GSA's AAP for PWD and barrier elimination efforts related to PWD. Of four previously reported barriers, one was fully resolved in FY 2024, and significant progress was made on two others. No new barriers related to PWD were identified in FY 2024.

Part A – Agency Identifying Information

TABLE 1:   Agency Identifying Information

1. Agency	U.S. General Services Administration (GSA)
2. Address	1800 F Street, NW
3. City, State, Zip code	Washington, D.C. 20006
4. Agency Code	GS00
5. FIPS Code[6]	11001
6. ANSI Code[7]	DC/11/50000

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[6] *See* EEOC Instructions to Federal Agencies for EEO MD-715, Section III.II.A, Line-by-Line Instructions for EEOC Form 715-02 and OPM Pay Area Definitions.

[7] *See* Census Resource Library American National Standards Institute (ANSI), Federal Information Processing Series (FIPS), and Other Standardized Geographic Codes and District of Columbia code.

Part B – Total Employment

FIGURE 1: GSA Total Employment [8]

13,368 Total Employees

97%   3%

■ **Permanent** ■ **Temporary**
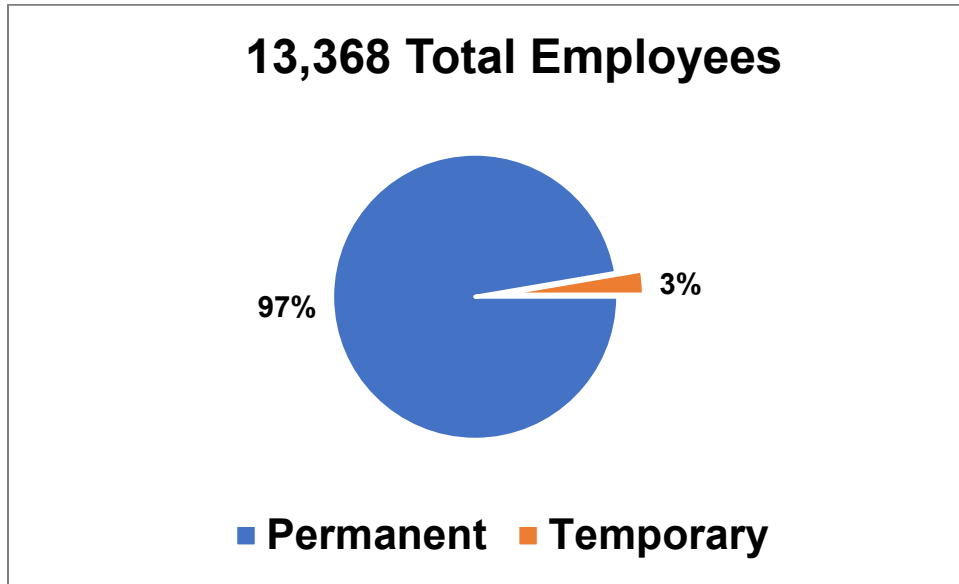
FIGURE 2: Distribution of Permanent Employees, by Pay Plan & GS Grade Level [9]

Permanent Employees, by Pay Plan & GS Grade Level

Pay Plan / Grade	Count
WG/WL/WS	21
GS1-10	871
GS11	689
GS12	3672
GS13	3859
GS14	2566
GS15	1177
SES+	128

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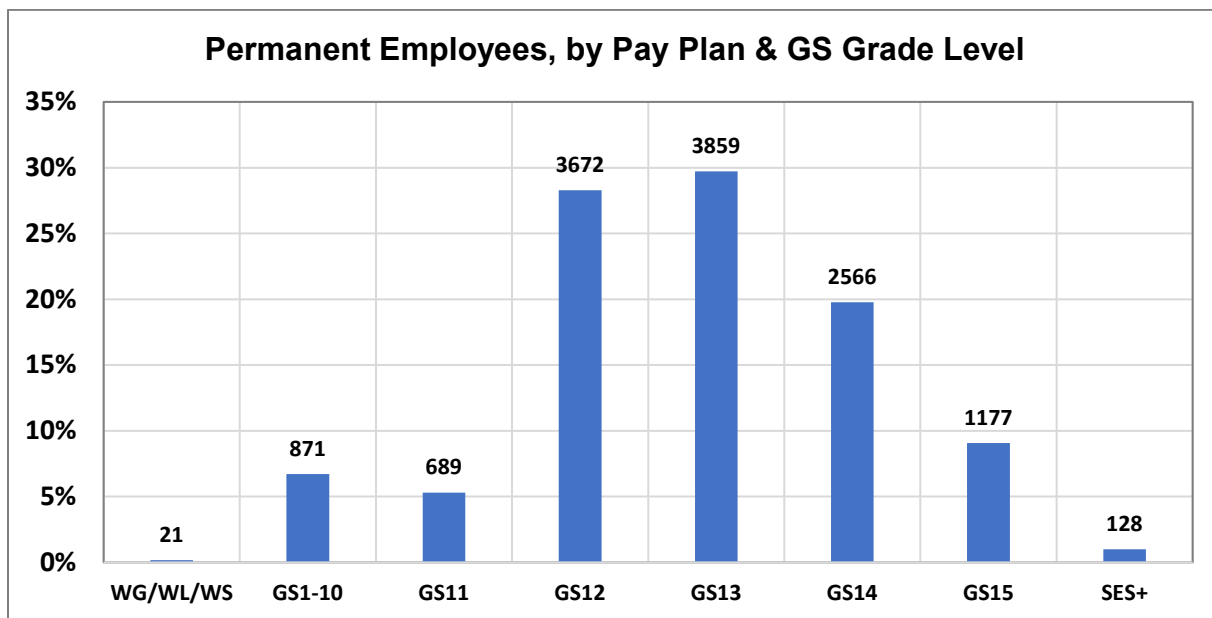
[8] Data as of September 30, 2024.

[9] The SES+ category includes ES, SL, ST, and CA (i.e., all non-GS and WG/WL/WS) positions.

Part C – Officials Responsible for Oversight of EEO-Related Programs

TABLE 2: GSA Responsible Officials

Title Type	Name	Title	Pay Plan, Series, Grade	Phone Number	Email Address
Head of Agency	Stephen Ehikian	Acting Administrator	ES-0301-00		
Principal EEO Director/Official	Aluanda Drain	Associate Administrator, OCR	ES-0343-00	202-501-0767	aluanda.drain@gsa.gov
Affirmative Employment Program Manager	Paul Boinay	Affirmative Employment Program Manager	GS-0260-14	202-710-7346	paul.boinay@gsa.gov
Complaint Processing Program Manager	Sylvia Anderson	EEO Manager	GS-0260-14	215-446-4967	sylvia.anderson@gsa.gov
Alternative Dispute Resolution Program Manager	Jill Badami	EEO Specialist	GS-0260-13	646-285-8321	jill.badami@gsa.gov
Compliance Manager	Karen Williford	Attorney-Advisor, Office of Civil Rights	GS-0905-14	202-304-9118	karen.williford@gsa.gov
Principal MD-715 Preparer	Paul Boinay	Affirmative Employment Program Manager	GS-0260-14	202-710-7346	paul.boinay@gsa.gov
Diversity & Inclusion Officer	Not Applicable	EEOC requires agencies to identify EEO officials, not only in the EEO office, but also in supporting roles across other departments, such as human resources. Gray shading indicates responsible officials and functions located outside the dedicated EEO office.			
Hispanic Program Manager	Not Applicable				
Women's Program Manager	Not Applicable	Due to Executive Order 14173 and related Office of Personnel Management Guidance, GSA no longer maintains staff for these specific four roles. While these rows remain in the FedSEP MD-715 template and cannot be removed, they will be marked "Not Applicable," in accordance with OPM's January 21 and February 5, 2025 memos regarding the discontinuation of Diversity, Equity, Inclusion, and Accessibility offices, programs, and initiatives.			
Disability Program Manager	Not Applicable				
Special Placement Program Coordinator (SPPC)	Lee Hall	Talent Teams Program Manager	GS-0201-14	301-821-3728	lee.hall@gsa.gov
Schedule A(u) Program Manager	Lee Hall	Talent Teams Program Manager	GS-0201-14	301-821-3728	lee.hall@gsa.gov
Reasonable Accommodation Program Manager	Emily Claybrook	Human Resources Specialist	GS-0201-14	202-754-2273	emily.claybrook@gsa.gov
Anti-Harassment Program Manager	Emily Claybrook	Human Resources Specialist	GS-0201-14	202-754-2273	emily.claybrook@gsa.gov

Part D – List of Subordinate Components

At the end of FY 2024,[10] GSA was composed of the Office of the Administrator, which oversaw twelve Staff Offices (including the Office of Civil Rights (OCR)), two Services, two independent Offices, and eleven geographically aligned Regions. GSA organizational components included the following:

Staff Offices:

- Office of Government-wide Policy
- Office of Chief Financial Officer
- Office of GSA Information Technology
- Office of Human Resources Management
- Office of the General Counsel
- Office of Customer Experience

- Office of Strategic Communication
- Office of Small & Disadvantaged Business Utilization
- Office of Civil Rights
- Office of Mission Assurance
- Office of Congressional & Intergovernmental Affairs
- Office of Administrative Services

Services:

- Federal Acquisition Service
- Public Buildings Service

Independent Offices:

- Office of the Inspector General
- Civilian Board of Contract Appeals

Regions:

- Region 1 – New England
- Region 3 – Mid-Atlantic
- Region 5 – Great Lakes
- Region 7 – Greater Southwest
- Region 9 – Pacific Rim
- Region 11 – National Capital

- Region 2 – Northeast & Caribbean
- Region 4 – Southeast Sunbelt
- Region 6 – Heartland
- Region 8 – Rocky Mountain
- Region 10 – Northwest/Arctic

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[10] This report reflects GSA's size, organizational structure, and regional distribution on September 30, 2024. Subsequent changes, if any, will be reflected in the FY 2025 MD-715 report.

FIGURE 3: GSA Regions
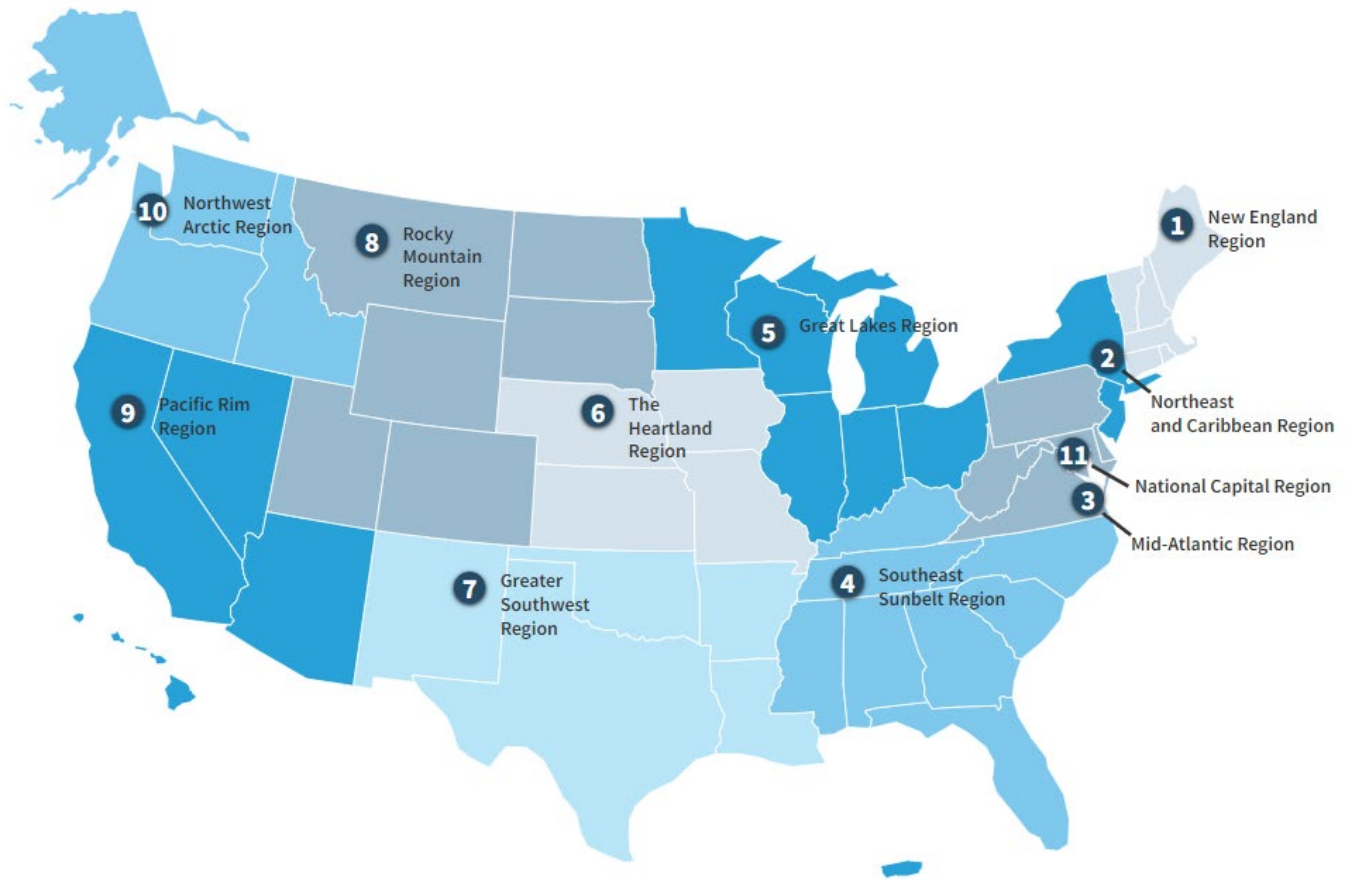
Part E – Executive Summary

Per the EEOC *Instructions to Federal Agencies for EEO MD-715* (hereafter EEOC Instructions), the purpose of this executive summary is to alert managers and supervisors of their responsibilities regarding the agency's EEO program. This summary provides a comprehensive overview of the program's direction, summarizing EEO-related deficiencies identified in previous fiscal years and outlining planned corrective actions. It also highlights root cause analyses of EEO barriers and strategies for their mitigation or elimination.

This executive summary provides an overview through ten mandatory sections (Parts E.1 through Part E.10), which include:

- **Part E.1** - The agency's mission and mission-related functions (Part E.1);

- **Parts E.2 - E.7** - Strengths and weaknesses in fulfilling EEO obligations, evaluated against the EEOC's Six Essential Elements of a Model EEO Program;

- **Parts E.8 and E.9** - Summary of EEO program accomplishments and compliance assessment activities, including trigger[11] and barrier[12] identification, barrier elimination or mitigation, and efforts to close data and information gaps; and

- **Part E.10** - Action items and plans for the upcoming year (Part E.10).

The following page provides a summary of the key outcomes from Parts E.2 through E.9, specifically:

- Compliance assessment results,

- Key triggers identified, and

- Barrier elimination progress.

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[11] Triggers are "red flags" that indicate the *possible* presence of a discriminatory barrier (see Footnote below). Agencies are required to identify triggers using workforce data, applicant flow data, career development data, climate survey results, exit surveys, EEO complaints, allegations of harassment, grievances, requests for reasonable accommodation, and other mandatory sources of information.

[12] Barriers are agency policies, procedures, practices, or conditions that limit or tend to limit employment opportunities for a particular group, based on sex, race, national origin, or disability status.

Summary Overview of Key FY 2024 MD-715 Findings:

- **Compliance:** Nine deficiencies were corrected in FY 2024 and 10 remain, related to:

  - Completeness and accuracy of employee and applicant data (4 deficiencies);

  - Barrier identification and implementation of elimination plans (3 deficiencies); and

  - Timely processing of requests for reasonable accommodations, initial harassment inquiries, and informal EEO counseling (1 deficiency each).

- **Triggers:** The most significant FY 2024 triggers were:

  - Unfavorable employment outcomes: Certain demographic groups experience unfavorable aggregated outcomes throughout the employment life cycle (e.g., low rates of selection, career development, and awards; lower performance ratings; high rates of discipline, grievances, EEO complaints, and involuntary separation).

  - Unfavorable distributions among occupational series: Certain demographic groups are found disproportionately in series that have the lowest opportunity for upward mobility (i.e., series with few (or no) positions above grade level GS13).

  - Unfavorable distributions among grade levels: Among series with *high* upward mobility potential (i.e., series with high percentages of positions at GS14 and above), the same groups are present disproportionately in the lower grade levels.

- **Barriers:** No new barriers were identified in FY 2024. Four were previously reported, all of which primarily affect employees with disabilities. In FY 2024, one was eliminated and progress was made on two others. The three remaining barriers include:

  - Untimely processing of requests for reasonable accommodation,

  - Untimely conversions of employees appointed under the Schedule A(u) appointment authority for individuals with significant disabilities,[13] and

  - Employees in non-permanent positions for extended durations.[14]

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[13] Employees appointed under the Schedule A(u) authority ([5 CFR § 213.3102(u)](#)) begin in the excepted service and are eligible for conversion to the competitive service after demonstrating two years of satisfactory performance. EEOC requires agencies to annually report if all eligible Schedule A(u) employees were converted into the competitive service, as well as the reasons for any non-conversions.

[14] This barrier will be closed out in FY 2025. Due to a combination of factors (e.g., FY 2025 data corrections and organizational changes), the key issues associated with this barrier will no longer exist.

Important Note: Distinction Between EEO and DEIA Programs:

GSA's EEO program and the now-discontinued Diversity, Equity, Inclusion, and Accessibility (DEIA) program were separate and distinct efforts. EEO is rooted in longstanding civil rights laws that prohibit discrimination based on race, color, religion, sex, national origin, disability, or reprisal for protected activity.[15] These protections are the foundation of OCR's mission to prevent and address unlawful discrimination in employment.

Under Executive Order (E.O.) 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity, federal agencies are directed to enforce these civil rights laws and uphold merit-based opportunity.[16] In addition to Title VII of the Civil Rights Act of 1964,[17] Section 501 of the Rehabilitation Act of 1973[18] prohibits disability-based discrimination in federal employment and requires affirmative action solely for individuals with disabilities.[19] Federal regulations further require agencies to set numerical goals for hiring and retaining individuals with disabilities.[20] Additionally, Section 508 of the Rehabilitation Act[21] mandates that federal agencies ensure their electronic and information technologies are accessible to people with disabilities.

The EEO program ensures compliance with these mandates through both the EEO complaint process and proactive efforts, such as the Affirmative Employment Program. While demographic data (e.g., race, national origin, sex, disability) are used for compliance assessments, the EEO program does not set diversity quotas, representation targets, or numerical goals related to race, sex, or national origin.[22]

In contrast, the former DEIA program lacked the legal foundation and enforcement mechanisms of EEO and was governed by separate, now-revoked executive guidance. Even during its implementation, E.O. 14035, Diversity, Equity, Inclusion, and Accessibility in the Federal

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[15] *See* Title VII of the Civil Rights Act of 1964 (Pub. L. 88-352), as amended.

[16] *See* E.O. 14173, January 21, 2025.

[17] *See* Title VII of the Civil Rights Act of 1964 (Pub. L. 88-352), as amended, and 42 U.S.C. § 2000e et seq.

[18] *See* Section 501 of the Rehabilitation Act of 1973.

[19] *See* 29 U.S.C. § 791(b) and EEOC's Final Rule on Affirmative Action for PWD in Federal Employment.

[20] *See* 29 CFR § 1614.203(d)(7).

[21] *See* 29 U.S.C. § 794d(a)(1)(A).

[22] *See* EEOC Instructions, Section II.I.E, which state that "Neither EEOC policy nor MD-715 requires agencies to establish racial or ethnic preferences or quotas. Indeed, federal anti-discrimination laws and EEOC's policies require that agencies prohibit discrimination, *including "reverse" discrimination*" [emphasis added].

Workforce (now revoked), acknowledged the distinction, directing agencies to establish DEIA officers separate from EEO officials and to build upon MD-715 reporting only where appropriate.

E.O. 14173 reinforces the government's responsibility to enforce existing anti-discrimination laws. MD-715 supports that directive by requiring agencies to analyze workforce data solely to prevent and eliminate unlawful discrimination - not to achieve demographic outcomes.

At GSA, the longstanding EEO program is overseen by OCR. The now-defunct DEIA efforts were previously led through the Office of the Administrator and staffed by the Office of Human Resources Management (OHRM).

E.1. Mission of GSA & EEO Program Purpose and Structure of GSA

The founding mission of GSA is to streamline federal operations, consolidate resources, and efficiently provide essential services that allow government agencies to focus on their core missions.[23] In FY 2025 and beyond, GSA will focus on serving its customers, congressional partners, and communities to:

- Optimize our Federal Buildings Portfolio,

- Streamline and centralize procurement in support of Executive Order 14240 - Eliminating Waste and Saving Taxpayer Dollars by Consolidating Procurement,[24]

- Rationalize our IT infrastructure & Software as a Shared Service, and

- Embrace GSA's model of efficiency.

Headquartered in Washington, DC, GSA operates through two major services - the Federal Acquisition Service and the Public Buildings Service - supported by twelve staff offices (including the Office of Civil Rights), eleven regional offices, and two independent offices.

The Associate Administrator of the Office of Civil Rights, GSA's principal EEO official, reports directly to the GSA Administrator, consistent with regulatory requirements.[25] At present, the Deputy Administrator is serving as the Acting Administrator.

GSA's organizational chart is publicly available at https://www.gsa.gov/about-us/organization.

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[23] *See* GSABLOG "My Vision for GSA"

[24] *See* E.O. 14230.

[25] *See* 29 CFR § 1614.102(b)(4), "The EEO Director shall be under the immediate supervision of the agency head." *See* also EEOC Management Directive 110, Chapter 1.III.B - The EEO Director Must Report Directly to the Agency Head. GSA remains in compliance with this requirement, with the Associate Administrator of OCR currently reporting to the Deputy Administrator, who is serving as the Acting Administrator.

FIGURE 4: GSA Organization Chart, as of the end of FY 2024

Chief of Staff — **Administrator** — Deputy Administrator

Services
- Federal Acquisition Service
- Public Buildings Service

Independent Offices
- The Inspector General
- Civilian Board of Contract Appeals

Regional Offices
- New England Region 1
- Northeast & Caribbean Region 2
- Mid-Atlantic Region 3
- Southeast Sunbelt Region 4
- Great Lakes Region 5
- Heartland Region 6
- Greater Southwest Region 7
- Rocky Mountain Region 8
- Pacific Rim Region 9
- Northwest/Arctic Region 10
- National Capital Region 11

Staff Offices
- Government-wide Policy
- Strategic Communication
- Chief Financial Officer
- Small & Disadvantaged Business Utilization
- GSA IT
- Civil Rights
- Human Resources Management
- Mission Assurance
- General Counsel
- Congressional & Intergovernmental Affairs
- Customer Experience
- Administrative Services

GSA's EEO Program

While GSA's EEO Program is administratively housed within OCR, <u>EEO is fundamentally an agency-wide responsibility</u>. EEO obligations extend beyond OCR, to include GSA senior leadership, managers and supervisors at all levels, all Services and Staff Offices (SSO), and OHRM. Those obligations require all parties to not only engage and collaborate in the execution of key EEO functions that are spearheaded by OCR (such as development of this MD-715 Report), but also to effectively support EEO through their independent efforts within their respective areas of responsibility.

OCR carries out functions required by the guiding civil rights laws and directives, including:

- Titles VI and VII of the Civil Rights Act of 1964, as amended;

- Sections 501, 504, and 508 of the Rehabilitation Act of 1973, as amended;[26]

- EEOC's regulations at 29 CFR § 1614, EEOC MD-110[27] and MD-715; and

- E.O. 14151, Ending Radical And Wasteful Government DEI Programs And Preferencing; E.O. 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government; and E.O. 14173.

TABLE 3: Office of Civil Rights Mission, Vision, and Values

Office of Civil Rights **Mission**:	
To protect civil rights, to champion equal opportunity, and to foster a fair workplace.	
Office of Civil Rights **Vision**:	
To be a trusted advisor to everyone we serve and to advance equal opportunity for all.	
Office of Civil Rights **Values**:	
Excellence:	We strive for excellence in everything we do.
Respect:	We treat everyone with dignity.
Integrity:	We are fair, trustworthy, and honor our commitments.
Compassion:	We are empathetic and caring to others.
Collaboration:	We go further together, as a team.

OHRM directly supports EEO by partnering on GSA's affirmative EEO efforts (e.g., MD-715 and the AAP for PWD), and indirectly by managing programs such as Reasonable Accommodations, Anti-Harassment, and the Disabled Veterans Affirmative Action Program (DVAAP).[28]

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[26] *See* 29 U.S.C. § 791 and the Americans with Disabilities Act Amendments Act of 2008 (Pub. L. 110-325).

[27] *See* EEOC MD-110 (Aug. 5, 2015).

[28] *See* 5 CFR § 720 Subpart C - Disabled Veterans Affirmative Action Program.

The Six Essential Elements of Model EEO Programs: GSA Self-Assessment and Action Items

GSA implements the six essential elements of a model EEO program[29] outlined in MD-715. The six essential elements[30] are identified by letters A thru F:

    A. Demonstrated commitment from agency leadership;

    B. Integration of EEO into the agency's strategic mission;

    C. Management and program accountability;

    D. Proactive prevention of unlawful discrimination;

    E. Efficiency; and

    F. Responsiveness and legal compliance.

GSA annually completes the EEOC's Part G Self-Assessment Checklist,[31] evaluating the agency's EEO program through 156 key measures. This comprehensive assessment identifies progress and deficiencies requiring corrective action across all agency-wide EEO responsibilities, and is documented in Part G[32] of the Report.

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[29] In this context, "EEO program" includes all responsibilities, agency-wide, related to and/or supporting EEO, including not only obligations of OCR's EEO Complaints Program and Affirmative Employment Program, but also the EEO-related responsibilities of all agency leaders, managers, supervisors, SSOs, and programs.

[30] *See* MD-715, Model Agency Title VII and Rehabilitation Act Programs, Section II; see also EEOC Instructions, Section I – The Model EEO Program.

[31] *See* MD-715 - Part G Agency Self-Assessment Checklist.

[32] The current EEOC Part G Self-Assessment Checklist template (2017) has not yet been updated to reflect E.O. 14173 or associated OPM Initial Guidance Regarding DEIA Executive Orders (January 21, 2025) or Further Guidance Regarding Ending DEIA Offices, Programs and Initiatives (February 5, 2025). For example, OPM's Further Guidance memo discusses elimination of Special Emphasis Programs (SEPs); however, the current Part G Self-Assessment Checklist template includes six compliance measures that reference SEPs (e.g., A.2.b.1, B.4.a.8, B.6.A, C.6.A, D.1.b, and D.2.d).

E.2. Essential Element A: Demonstrated Commitment from Agency Leadership

MD-715 requires agency leadership to demonstrate a visible commitment to EEO, integrating equal opportunity principles throughout the organization.[33] The assessment evaluates this commitment through the agency head's issuing of an annual EEO policy statement, agency communications about EEO, recognition mechanisms supporting EEO, and efforts to embed EEO principles in the organizational culture.

<u>GSA has no deficiencies in the 14 Part G measures associated with this essential element</u>.

During FY 2024, GSA leadership demonstrated this commitment through the following actions:

- The GSA Administrator issued a new EEO policy statement on August 15, 2024.[34]

- 100% of supervisors and managers timely completed mandatory EEO training.

- All GSA employees receive training on the employee-specific EEO topics addressed within the Part G self-assessment.

- GSA actively monitors workforce perceptions through the annual Office of Personnel Management (OPM) Federal Employee Viewpoint Survey (FEVS), which assesses federal employee experiences via various perception measurements and indices.[35] In 2024, GSA achieved outstanding results in the survey:

  - The 2024 employee response rate was 67% - 26% above the 2024 government-wide average of 41% and 12% above the Large Agencies[36] average of 55%.[37]

  - On average, GSA outperformed peer Large Agencies by 17.5% and the government-wide average by 19.6% across the 2024 FEVS indices.

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[33] This MD-715 mandate reinforces statutory requirements. *See* 42 U.S.C. § 2000e-16(e) (emphasizing the "primary responsibility" of agency heads "to assure nondiscrimination in employment as required by the Constitution and statutes" and "responsibilities under Executive Order 11478 relating to equal employment opportunity in the Federal Government").

[34] *See* MD-715, Section II.A. *See* also EEOC Instructions, Section I.I.A.

[35] The 2024 FEVS cycle was administered May 13, 2024 through June 28, 2024. FY 2024 FEVS data was released partially in FY 2024 and partially in early FY 2025, after the conclusion of the fiscal year, but in time for relevant analyses to be completed in support of ongoing barrier investigations.

[36] FEVS size categories consider Large Agencies to be between 10,000 and 74,999 employees; GSA's size at the end of FY 2024 was 13,368 employees. A total of 12,341 employees were surveyed in 2024.

[37] *See* agency response rates and OPM 2024 FEVS Governmentwide Management Report, p.4.

- GSA ranked #1 among Large Agencies in 15 of 16 indices and #2 in the remaining index (Employee Experience Index). Scores also exceeded overall averages across all five agency-size categories. Additionally, GSA FEVS scores were higher than the overall Government-wide averages, as well as the overall averages for all five agency size categories, from Very Small to Very Large.

- GSA's scores improved across all 16 indices in 2024. Overall, GSA scores on the FEVS indices increased an average of 1.3% in 2024.

E.3. Essential Element B: Integration of EEO into Agency's Strategic Mission

EEOC Instructions emphasize that EEO is integral to an agency's strategic mission, with the program's success depending on individual manager decisions.[38]

To comply with this element,[39] the agency must:

- Establish a reporting structure allowing the principal EEO official direct access to the agency head and other senior management officials to report on program effectiveness and legal compliance of the agency's Title VII and Rehabilitation Act programs.

- Involve EEO professionals in management and personnel actions, including strategic planning, recruitment, succession planning, and training/career development.

- Allocate sufficient resources to support EEO efforts, including:

  o Core EEO functions (complaints processing, compliance assessments, barrier analyses, and training).

  o Critical related OHRM programs (Anti-Harassment, Reasonable Accommodation, DVAAP, etc.).

  o Comprehensive data collection and tracking systems (including systems for managing and analyzing workforce employment lifecycle demographics, applicant flow data, training, recruitment, surveys, EEO complaints, allegations of harassment, and requests for reasonable accommodation).

- Provide mandatory training for managers and supervisors on their responsibilities relating to (a) reasonable accommodations, (b) anti-harassment, (c) EEO complaints, (d) alternative dispute resolution, and (e) effective supervisory/managerial communications and interpersonal skills.

- Ensure senior managers' participation in barrier analysis and EEO action plan development.

Additionally, this element requires elevating the significance of EEO within the agency's mission by ensuring the Principal EEO official reports directly to the agency head, prominently displaying

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[38] *See* EEOC Instructions, Section I.II.B - Integration of EEO into the Agency's Strategic Mission.

[39] *See* MD-715 Section II.B - Model Agency Title VII and Rehabilitation Act Programs.

this reporting relationship on the agency organizational chart, and substantively integrating EEO principles into the agency's overarching strategic planning.

FY 2024 Highlights:

GSA supports this element through its compliant reporting structure, integration of EEO principles into its strategic decision-making and strategic plan, and resourcing critical EEO functions, including complaints processing and the Affirmative Employment Program, within OCR. Improvements in the Reasonable Accommodations and Anti-Harassment Programs further underscore the agency's compliance with this element.

In FY 2024, GSA's significantly expanded its data analysis capabilities by incorporating a more comprehensive range of relevant employee data that supports compliance assessments, trigger identification, and root cause analysis. Specifically, in FY 2024, mentoring data, additional EEO complaint data, and additional FEVS response categories were all added to the data sets analyzed by GSA. Additionally, both OHRM and OCR conducted surveys related to anti-harassment efforts, and the responses and data from those surveys were integrated and analyzed by the Affirmative Employment Program for purposes of trigger identification, evaluation of program effectiveness, and intersectional analyses intended to correlate findings across other relevant data sets.

GSA has 2 deficiencies (out of 39 measures) in this essential element. Two other deficiencies under this essential element (reported in FY 2023) were fully resolved in FY 2024.

While GSA made notable progress in FY 2024 toward addressing reported barriers and deficiencies, additional work is needed in FY 2025 to become fully compliant, including:

- Implementation of corrective plans to eliminate the three remaining barriers, and

- Improvement of employee and applicant data to support MD-715 barrier analysis and reporting requirements.

E.4. Essential Element C: Management and Program Accountability

MD-715 requires agencies to hold managers, supervisors, human resources (HR) staff, and EEO officials accountable for effectively implementing Title VII and Rehabilitation Act obligations. To meet this standard, agencies must:

- Ensure EEO and HR offices collaborate on barrier analyses, MD-715 reporting, the AAP for PWD, outreach and recruitment efforts, and manager and supervisor EEO training;

- Maintain accurate and complete employee, applicant, and training data to support barrier analysis and submission of annual MD-715 data tables;

- Analyze relevant data from other sources, including exit and climate surveys, harassment allegations, reasonable accommodation requests, and grievances;

- Timely process requests for reasonable accommodation and initial harassment inquiries;

- Coordinate EEO efforts with related HR programs (e.g., Anti-Harassment, Selective Placement Program[40] (SPP) for PWD, and DVAAP);

- Prevent discrimination, including failure to accommodate qualified individuals with disabilities; and

- Require all supervisors to be evaluated on their support for EEO through performance plans, based on nine criteria specified by the EEOC: (1) resolving EEO conflicts, including participating in alternative dispute resolution; (2) ensuring cooperation of subordinates with EEO officials; (3) maintaining a workplace free from discrimination (including harassment and retaliation); (4) ensuring subordinate supervisors have effective managerial, communication, and interpersonal skills; (5) providing reasonable religious and (6) disability-related accommodations; (7) supporting barrier analysis and (8) anti-harassment efforts, and (9) complying with settlement agreements and orders.

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[40] *See* OPM Selective Placement Program Coordinator guidance.

Strengths, Progress, Collaboration, and Deficiencies:

This essential element includes many of GSA's most significant *strengths*, most notable *progress*, and most productive EEO-related *collaboration*; however, key factors within those same areas fall short of EEOC's compliance thresholds, and thus contribute to reportable deficiencies.

GSA has 4 deficiencies (out of 44 measures) in this essential element. Three deficiencies under this essential element (reported in FY 2023) were fully resolved in FY 2024.

Accomplishments in this Essential Element:

- **Data Contributions**: OHRM annually provides OCR with more than 30 million data elements spanning dozens of relevant categories and programs, supporting barrier analysis and MD-715 reporting. Further progress was made in FY 2024; however, key data deficiencies remain that hinder specific analysis and reporting requirements and are reportable under Part G. Addressing them is a priority for FY 2025.

  - **Enhanced Data Integrity**: In FY 2024, GSA developed procedures to systematically address certain inaccurate or incomplete employee race/national origin categorizations, as well as inaccurate disability status data for employees appointed under the Schedule A(u) appointment authority.

  - **Expanded Training Data**: Mentoring program data was added in FY 2024, resolving a previous data gap and supplementing existing data related to external competitive career development programs, fellowships, and internships, as well as internal details, temporary promotions, job shadowing, and other training opportunities.

  - **Disability Data and Program Alignment**: OCR and OHRM developed a disability data dashboard, improving tracking and analysis of the effectiveness and progress of disability-focused programs (e.g., AAP for PWD, DVAAP, SPP) and initiatives.

- **Improved Coordination**: Improved collaboration between OCR and OHRM resolved one barrier and nine reported deficiencies and led to progress on two other barriers; however, greater inter-office collaboration is needed on:

  - Barrier analysis and implementation of reported barrier elimination plans; and

  - Coordination between interrelated EEO and HR programs (e.g., SPP, DVAAP, and Schedule A(u)).

Program-Specific Progress:

- **Reasonable Accommodation:** Processing timeliness for disability-related reasonable accommodation requests reached 91% in FY 2024, up from 86% in FY 2023 and 62% in FY 2022. The EEOC standard[41] is 100% compliance with the agency's 30-day policy deadline.[42] Within that time-frame, GSA must either (a) deny the request or (b) provide the approved accommodations.[43]

- **Initial Harassment Inquiries**: OCR and OHRM improved inter-office coordination on processing harassment allegations. Overall timeliness of initial harassment inquiries increased to a record 95% in FY 2024 (up from 87% in FY 2023). The EEOC requires that 100% of harassment allegations receive an initial inquiry within 10 days of being reported.[44] At GSA, 54% of harassment allegations originated during the EEO complaint process, underscoring the importance of close coordination between OHRM and OCR.

- **Schedule A(u) Conversions**: OCR and OHRM improved timeliness of conversions of Schedule A(u) employees from the excepted service to the competitive service. The intention of Schedule A(u) is to enable qualified PWD to achieve competitive status,[45] after first completing two years of satisfactory service in the excepted service.[46] EEOC requires agencies to annually report the conversion status of eligible Schedule A(u) employees.[47] In FY 2024, GSA reduced previously overdue conversions by 95%.

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[41] *See* EEOC Instructions, Section I.III.B.2.b; and MD-715 Self-Assessment Checklist, measure C.2.b.5.

[42] GSA policy sets a 30-day maximum, absent extenuating circumstances. *See* GSA Policy and Procedures for Providing Reasonable Accommodation (2300.1A HRM). Chapter 2.8.a (p. 21) states "GSA will process requests for reasonable accommodation and provide accommodations, if granted, in as short a time frame as reasonably possible." Chapter 2.9 (p. 22) directs that the agency "should provide the reasonable accommodation as soon as possible but not to exceed thirty (30) calendar days from receipt of the request, unless extenuating circumstances exist."

[43] *See* 29 CFR § 1614.203(d)(3)(i)(M).

[44] *See* EEOC Instructions, Section I.III.B.1.b; and MD-715 Self-Assessment Checklist, measure C.2.a.5.

[45] *See* Executive Order 12125 and Executive Order 13124.

[46] *See* 5 CFR § 315.709.

[47] *See* EEOC MD-715 - Part J Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities, Section V.A.1. *See also* 5 CFR § 213.3102(u)(6)(i).

E.5. Essential Element D: Proactive Prevention of Discrimination

MD-715 requires agencies to proactively prevent discrimination based on race, color, national origin, religion, sex, age, disability, and reprisal, and to eliminate systemic barriers to equal employment opportunity. Agencies must conduct annual self-assessments to monitor progress, identify potential barriers, and develop strategic plans to remove them.[48]

GSA has 1 deficiency (out of 14 measures) in this essential element. Three deficiencies under this essential element (reported in FY 2023) were fully resolved in FY 2024.

Agencies are also required to:

- Maintain an affirmative action plan for hiring, placement, and advancement of individuals with disabilities (Part J of MD-715);[49]

- Take proactive steps to increase employment of PWD, particularly Persons with Targeted Disabilities (PWTD).[50]

To meet these requirements agencies must:

- Annually identify potential signs of discrimination (triggers) using a wide range of data sources (e.g., employee and applicant flow data, EEO complaints, harassment allegations, career development, reasonable accommodations, surveys);

- Develop, implement, and report on corrective action plans demonstrating measurable progress;

- Ensure effective implementation of the AAP for PWD; and

- Take targeted actions to expand employment of PWD and PWTD.[51]

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[48] *See* MD-715, Section II.D and EEOC Instructions, Section I.IV.

[49] *See* MD-715, Part B.I.

[50] Targeted disabilities are a subcategory that includes twelve of the most severe disabilities, including developmental disabilities, traumatic brain injuries, blindness, deafness, partial and complete paralysis, missing extremities, severe mobility impairments, dwarfism, epilepsy, intellectual disabilities, and significant psychiatric disorders. The Federal government places emphasis on recruiting, hiring, and retaining people with targeted disabilities (PWTD), and both OPM and the EEOC track statistics on PWTD. See OPM Reference Materials, OPM SF-256, and EEOC's Final Rule.

[51] *See* 29 CFR § 1614.203(d)(7)(ii) and MD-715, Part B.VI.

GSA Strengths in FY 2024:

- **Refined Trigger Identification:** GSA's automated trigger identification process enables consistent, efficient detection and prioritization of potential barriers and supports increasingly detailed root cause analyses.

- **Improved AAP Collaboration:** Enhanced inter-office collaboration on the AAP for PWD resolved a previously reported barrier and contributed to closing five Part G deficiencies.

- **Exit Survey Enhancement:** A mandatory EEOC-required question was added to the GSA Exit Survey to improve insight into PWD recruitment and retention, resolving a previously reported Part G deficiency.

- **Interagency Expertise:** GSA shared best practices with the EEOC and other agencies on disability data, benchmarking, and self-identification of PWD.

- **Mission-Critical Occupation Reporting:** GSA expanded analysis of mission-critical occupations (MCO)[52] from 10 series (between FY 2021 and FY 2023) to 12 series in FY 2024, with plans to increase to as many as 20 series in FY 2025, to further improve GSA trigger identification and barrier analysis efforts.

Areas for Improvement:

- While one barrier was eliminated in FY 2024 (collaboration on the AAP for PWD) and significant progress was made on two others (timeliness of reasonable accommodations and Schedule A(u) conversions), GSA did not fully implement all planned actions necessary to eliminate the reported barriers (which is a reportable deficiency[53]).

- Additional coordination is needed between the Affirmative Employment Program and interrelated HR programs that influence PWD outcomes, including:

  o Reasonable Accommodation Program;

  o DVAAP;

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[52] MCOs are defined by the EEOC Instructions, Section II.II.A as "agency occupations that are mission-related with career advancement potential and heavily populated within the agency." EEOC Instructions require federal agencies to annually compile, analyze, and report key statistics related to new hires, internal competitive promotions, and organization of their MCOs.

[53] See EEOC Instructions, Section I.IV.C.2; and MD-715 Self-Assessment Checklist, measure D.3.b.

o   Selective Placement Program;

o   Schedule A(u) hiring and conversion practices;

o   Management of disability status codes for Schedule A(u) appointees and disabled
    veterans hired under the Veterans' Recruitment Appointment (VRA) authority,[54]
    Veterans Employment Opportunity Act (VEOA) authority,[55] and the 30% or More
    Disabled Veteran hiring authority;[56] and

o   Alignment between disability status codes, appointment authority codes, and
    veterans' preference codes indicating service-connected disabilities.[57]

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[54] *See* OPM Special Hiring Authorities for Veterans - Veterans' Recruitment Appointment (VRA).

[55] *See* OPM Special Hiring Authorities for Veterans - Veterans Employment Opportunities Act (VEOA).

[56] *See* OPM Special Hiring Authorities for Veterans - 30 Percent or More Disabled Veteran.

[57] *See* OPM Vet Guide for HR Professionals and OPM Data Standards on Veterans Preference. Veterans'
Preference Codes 4 and 6 *always* indicate status as a disabled veteran and Veterans' Preference Code
3 either indicates status (a) as a disabled veteran or (b) as a Purple Heart awardee without a service-
connected disability.

E.6. Essential Element E: Efficiency

MD-715 requires agencies to maintain effective systems for evaluating the impact and effectiveness of EEO programs and a fair and efficient process for resolving disputes.[58] To comply, agencies must:

- Maintain an impartial and efficient EEO complaint process, separate from functions with conflicting interests;

- Promote and support widespread use of alternative dispute resolution (ADR) to resolve issues early and informally;[59]

- Accurately collect, monitor, and analyze data on:

  o Reasonable accommodations;

  o Workforce demographics (race, national origin, sex, and disability status);

  o Applicant flow;

  o Surveys;

  o Harassment allegations;

  o Recruitment efforts; and

  o EEO complaint activity.

GSA has 3 deficiencies (out of 33 measures) in this essential element. One deficiency under this essential element (reported in FY 2023) was fully resolved in FY 2024.

 FY 2024 Highlights:

- **Reduced Complaints:** Pre-complaint activity declined to 89 (from 94 in FY 2023), and formal complaints dropped to 47 (from 64 in FY 2023).

- **Timeliness:** All formal complaint investigations and final agency decisions were timely, though one pre-complaint was not counseled within the required timeframe (a reportable deficiency).

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[58] *See* MD-715, Section II.E and EEOC Instructions, Section I.V.C.

[59] For more information on ADR, see EEOC guidance on Federal Sector Alternative Dispute Resolution.

- **Neutral Process:** OCR's Adjudication Team includes a dedicated Attorney Advisor (GS-0905), helping ensure the EEO process remains impartial and independent.[60]

Data Systems and Management:

Two deficiencies in this element related to the adequacy of systems for collecting and managing data necessary to evaluate EEO-related programs, specifically employee data and applicant flow data. While improvements were made in FY 2024 - particularly addressing blank or inaccurate race/national origin data - further improvements are needed to ensure full compliance with MD-715 and OPM data standards, including data related to disability status.

Clarifying Interrelated Deficiencies

- MD-715's Part G checklist assesses agency compliance across different elements. For example:

  o Element C measures data accuracy and completeness (i.e., outcomes);

  o Element B evaluates whether funding and staffing are adequate to achieve those required data-related outcomes; and

  o Element E assesses whether data systems and management (including hardware, software, and data management procedures) are sufficient to achieve the required outcomes.

Part G Compliance Deficiencies and Part H Corrective Plans

- Every Part G Self-Assessment deficiency must be addressed by a Part H corrective plan. Individual corrective plans may address multiple related deficiencies:

  o Plan H.1 addresses separate aspects of 3 different Part G deficiencies associated with *barrier analysis*,

  o Plan H.2 also covers 3 Part G deficiencies, related to *employee data*, and

  o Plan H.5 also covers 3 Part G deficiencies, related to *applicant flow data*.

- In some cases, a single deficiency is addressed by multiple corrective plans (e.g., one FY 2024 deficiency is addressed in part by both Plan H.2 and Plan H.5).

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[60] *See* MD-110, Section IV.D.

E.7 Essential Element F: Responsiveness and Legal Compliance

Per EEOC guidance related to this essential element,[61] agencies must:

- Ensure timely compliance with EEOC orders and settlement agreements;

- Adhere to all applicable laws, regulations, management directives, orders, and written guidance; and

- Accurately report EEO program efforts and accomplishments to the EEOC.

GSA is fully compliant with all measures within this essential element.

FY 2024 Deficiencies and Corrective Actions

In FY 2024, GSA identified a total of ten compliance deficiencies across all essential elements. They are being addressed by six Part H corrective plans.[62] The following table summarizes the associated Part G measures and their corresponding Part H corrective action plans.

TABLE 4: Part G Self-Assessment Measures Identified as Deficient

	Measure				Questions	Part H Plan
					Has the agency allocated sufficient funding and qualified staffing to:	
1	B	4	a	2	Conduct a thorough barrier analysis of its workforce?	H.1
2	B	4	a	7	Maintain accurate data collection/tracking systems for workforce and applicant flow data?	H.2 & H.5
3	C	2	a	5	Are inquiries begun of all harassment allegations within 10 days of notification, including those initially raised in the EEO complaint process? What is the percentage of timely inquiries?	H.3
4	C	2	b	5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? What is the percentage of timely-processed requests?	H.4
5	C	4	c		Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 data tables?	H.2 & H.5
					Does the EEO office collaborate with the HR office to:	
6	C	4	e	4	Identify and remove barriers to EEO in the workplace?	H.1
7	D	3	b		If the agency identified barriers during the reporting period, did the agency implement a plan in Part I or Part J, including meeting the target dates for the planned activities?	H.1
8	E	1	a		Does the agency timely provide EEO counseling, pursuant to 29 CFR § 1614.105?	H.6
					Does the agency have systems in place to accurately collect, monitor, and analyze:	
9	E	4	a	2	The race, national origin, sex, and disability status of agency employees?	H.2
10	E	4	a	4	External/internal applicant flow data concerning race/national origin/sex/disability status?	H.5

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[61] *See* MD-715, Section II.F and EEOC Instructions, Section I.VI.F.

[62] Three overarching deficiency topics (workforce data, applicant flow data, barrier identification and elimination) span multiple essential elements. Where applicable, individual Part H plans simultaneously address multiple deficiencies within the same topic area and/or that share underlying root causes.

E.8 Workforce Analysis

GSA's Affirmative Employment Program conducts comprehensive annual analyses of employee data, applicant data, and relevant information from many other sources, in order to identify and investigate triggers - potential indicators of barriers to equal employment opportunity.

To enable consistent analyses and reporting across the federal government, the EEOC requires all agencies to develop mandatory tables and conduct prescribed analyses of the "participation rates" (i.e., representation rates) of key demographic groups, relative to specified benchmarks, in various employment activities and at key milestones spanning the employment life cycle.

GSA routinely evaluates 20 primary data categories. Key focus areas include <u>organizational groupings</u> (e.g., entire agency, individual GSA services and offices, occupational series, grade levels, steps), <u>demographics</u> (e.g., race, national origin, sex, disability status), <u>employment outcomes</u> (e.g., new hires, internal promotions, career development selections, awards, performance ratings, requests for reasonable accommodation, findings of discrimination, disciplinary actions, separations), and data relating to <u>employee and applicant perceptions</u> (e.g., survey responses, grievances, discrimination complaints, allegations of harassment).

TABLE 5: Primary Data/Information Sources Used for Trigger Identification and Root Cause Analysis

Employee Data	Harassment Allegations
Applicant Flow Data	Grievances
Competitive Development Program[63] Data	EEO Complaints
Internship Data	Organizational Climate Surveys (e.g., FEVS)
Mentoring Program Data	Topic-Specific Pulse Surveys
Detail Opportunities	Schedule A(u) Hires, Conversions, & Data
Temporary Promotion Opportunities	Exit Surveys
Other Training Programs/Opportunities[64]	Disciplinary Actions
Disability-Related Reasonable Accommodations	Performance Ratings
Recruitment Data	Career Ladder Programs

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[63] FY 2024 GSA Competitive Development Programs (CDPs) were intended to provide leadership development opportunities via recognized *external* programs (including fellowships), that focus on leadership competencies required for current and future leaders (e.g., Harvard Kennedy School Leadership Decision-Making, American University New Supervisor Leadership Development, Center for Creative Leadership Maximizing Your Leadership Potential Program, eCornell Psychology of Leadership and Servant Leadership Programs, Graduate School USA Partnership for Public Service Excellence in Government Fellows Program and Leadership Excellence for Acquisition Professionals Program).

[64] Other training programs include job shadowing, part-time projects, and other *internal* career development opportunities, including both agency-wide opportunities (widely advertised through the GSA Opportunity Network) and programs unique to particular GSA offices, services, programs, or business lines.

At the close of FY 2024, GSA employed 13,368 individuals across 2 services, 12 staff offices, and 2 independent offices in 11 regions. These employees spanned 10 different pay plans and 100 different occupational series, ranging in grade from Wage Grade (WG) 03 to the Senior Executive Service (SES).

The GSA workforce is predominately composed of permanent (97%) and General Schedule (GS) employees (98.8%). Most employees (76%) are in grades GS12 thru GS14. Only 7% of employees are in grades below GS11. Senior pay plan employees (i.e., ES, EF, EX, SL, ST, or CA) account for 1% (133) of the workforce, while just 0.2% (21) are in positions in the Federal Wage System (WG, WL, or WS).

TABLE 6: Total (Permanent and Temporary Populations), by Grade Level

Pay Plans	Population	Percentages	
WG/WL/WS	21	0.2%	
GS1-10	906	6.8%	12%
GS11	703	5.3%	
GS12	3705	27.7%	28%
GS13	3901	29.2%	29%
GS14	2612	19.5%	
GS15	1387	10.4%	31%
SES+	133	1.0%	

GSA's 20 most populous occupational series each have 100 or more employees and together represent over 90% of the workforce.

TABLE 7: 20 Most Populous GSA Occupational Series in FY 2024

Series #	Series Title	#	%
1102	Contracting	2306	17.3%
1101	General business and industry	2095	15.7%
0343	Management and program analysis	1345	10.1%
2210	Information technology management	1180	8.8%
0301	Miscellaneous administration and program	1113	8.3%
1176	Building management	917	6.9%
1170	Realty	504	3.8%
2150	Transportation operations	362	2.7%
0501	Financial administration and program	316	2.4%
0201	Human resources management	239	1.8%
0560	Budget analysis	239	1.8%
0809	Construction control technical	206	1.5%
0801	General engineering	191	1.4%
0905	General attorney	191	1.4%
0510	Accounting	167	1.2%
0340	Program management	160	1.2%
1670	Equipment services	146	1.1%
0808	Architecture	141	1.1%
0511	Auditing	129	1.0%
1104	Property disposal	116	0.9%

Temporary employee representation varies across GSA's services and offices. In FY 2024, the Technology Transformation Services group within the Federal Acquisition Service had the highest number of temporary staff.

TABLE 8: Populations of GSA SSOs in FY 2024

SSO	SSO Description	Perm	Temp	Total	
PBS	Public Buildings Service	5636	50	5686	43%
FAS	Federal Acquisition Service	4409	263	4672	35%
OCFO	Office of Chief Financial Officer	794	4	798	6.0%
GSA IT	Office of GSA Information Technology	492	12	504	3.8%
OHRM	Office of Human Resources Management	464	6	470	3.5%
OIG	Office of the Inspector General	273	2	275	2.1%
OGP	Office of Government-wide Policy	241	7	248	1.9%
OGC	Office of the General Counsel	178	4	182	1.4%
OAS	Office of Administrative Services	128	4	132	1.0%
OMA	Office of Mission Assurance	118	3	121	0.91%
OSC	Office of Strategic Communication	96	2	98	0.73%
OSDBU	Office of Small & Disadvantaged Business Utilization	38		38	0.28%
OCIA	Office of Congressional & Intergovernmental Affairs	29	3	32	0.24%
CBCA	Civilian Board of Contract Appeals	29	3	32	0.24%
IOA	Immediate Office of the Administrator	18	20	38	0.28%
OCR	Office of Civil Rights	18		18	0.13%
OCE	Office of Customer Experience	15		15	0.11%
ORA	Offices of the Regional Administrators	7	2	9	0.07%
		12983	**385**	**13368**	

MD-715 requires agencies to analyze and report data on key organizational groups (e.g., agency, subcomponents, pay plans, occupational series, grade levels, managerial positions) and specified employment milestones (e.g., applications, qualifications, referrals, interviews, selections). Agencies must track, analyze, and report data points throughout the employment life cycle - from recruitment to separation (including, but not limited to, selections, hires, career development, training, advancement, promotions, awards and recognition, disciplinary actions, and separations). Agencies must also analyze data from many other sources of information, such as results of organizational climate surveys, exit surveys, reasonable accommodations, EEO complaints, harassment allegations, and grievances.

A core requirement of MD-715 is to capture, maintain, analyze, and report demographic data, including race, national origin, sex, and disability status, for both employees and applicants. *Employee* demographic data is primarily obtained via self-identification; however, if an

employee declines to provide race/national origin information, the *agency* must assign a category on their behalf.[65] If an employee's disability field is left blank, it defaults to "I have no disability." *Applicant* demographics come <u>only</u> from voluntary self-identification. If an applicant does not self-identify a race/national origin or disability status, those data fields remain blank.

MD-715 requires agencies to analyze and report data for specific demographic groups. The required data elements for race/national origin (ethnicity)[66] and sex combine the two categories, resulting in fourteen distinct demographic groups (e.g., Asian Female, White Male) that must be analyzed and reported.[67] Race/ethnicity categories are based on Office of Management and Budget (OMB) directives.[68] In FY 2024, agencies were required to report using five race categories, one ethnicity category (Hispanic or Latino), and two sex categories (Male or Female).[69] In reports, GSA often uses abbreviations for these groups to conserve space.

TABLE 9:   Race/Ethnicity/Sex Groups and Respective Abbreviations

	Full Demographic Group Title	Abbrev.
1	Hispanic or Latino Male	HM
2	Hispanic or Latino Female	HF
3	White Male	WM
4	White Female	WF
5	Black or African American Male	BM
6	Black or African American Female	BF
7	Asian Male	AM
8	Asian Female	AF
9	American Indian or Alaska Native (**AIAN**) Male	IM
10	American Indian or Alaska Native (**AIAN**) Female	IF
11	Native Hawaiian or Pacific Islander (**NHOPI**) Male	NM
12	Native Hawaiian or Pacific Islander (**NHOPI**) Female	NF
13	Two or More Races Male	2M
14	Two or More Races Female	2F

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[65] *See* 29 CFR § 1614.601(b) EEO group statistics: "If an employee does not voluntarily provide [the requested data on race, national origin and sex]…*the <u>agency</u> must make visual identification and inform the employee of the data it will be reporting*" [emphasis added].

[66] "National origin" and "ethnicity" are used interchangeably in MD-715, the EEOC MD-715 Instructions, and OPM data standards and forms (e.g., Ethnicity and Race Identification, Race or National Origin, OPM Standard Form 181 (SF-181)); however, OMB directives and Census use "ethnicity" exclusively, with regards to categorizing demographics for all federal information collection and reporting purposes.

[67] *See* EEOC Instructions, Section IV.E.

[68] OMB Statistical Policy Directive No. 15 (SPD15) provides federal standards and guidance for maintaining, collecting, and presenting data on race and ethnicity. SPD15 1997 was in effect at the beginning of FY 2024. SPD15 2024 became effective on March 28, 2024 (e.g., adding Middle Eastern or North African as a race); however, federal agencies have until March 28, 2029 to comply with the SPD15 revisions.

[69] *See* EEOC MD-715 A Tables.

EEOC requires agencies to identify potential barriers by comparing workforce demographics and specified EEOC benchmarks. Significant differences between actual agency rates and their respective relevant benchmarks are indicators of potential barriers. Notably, achieving parity[70] with race, national origin, and/or sex benchmarks is not the goal; instead, the analysis focuses on identifying significant disparities - known as triggers - for further investigation.[71]

Benchmarks and agency demographics are both converted to percentages, known as "participation rates," by dividing a demographic group's population by the total population of the comparison group (e.g., agency-wide, by series, or grade level). ██████████████████
███

Population Data:

███
███
███
███
███
██
███ .

TABLE 10: FY 2024 Populations and Participation Rates of Race/National Origin/Sex Groups

FY 2024	HM	HF	WM	WF	BM	BF	AM	AF	NM	NF	IM	IF	2M	2F
Population														
Participation Rate (%)														

In addition to the race/national origin/sex categories, MD-715 also requires agencies to track and analyze sixteen disability-related categories,[72] as defined in OPM standards.[73] Those categories include four overarching groups, plus each of the twelve targeted disabilities:

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[70] EEOC Instructions, Section II.I, state that "In the past, agencies focused on achieving parity, which temporarily improved workforce demographics. *MD-715, however, requires agencies to move beyond treating the symptom (i.e., workforce demographics) to cure the true problem*" [emphasis added].

[71] Ibid., Section II.I.E states that "Neither EEOC policy nor MD-715 requires agencies to establish racial or ethnic preferences or quotas. Indeed, federal anti-discrimination laws and EEOC's policies require that agencies prohibit discrimination, *including "reverse" discrimination*" [emphasis added].

[72] *See* EEOC MD-715 B Tables.

[73] *See* OPM SF-256.

- **No Disability**: Instances where employees either (a) do not self-identify[74] (i.e., leave their forms blank) or (b) indicate "I do not have a disability or serious health condition;"

- **Not Identified**: Cases where individuals indicate "I do not wish to identify my disability or serious health condition;"

- **PWTD**: All individuals who self-identify using at least one of the twelve targeted disabilities or serious health conditions (e.g., deaf, blind, paralysis, developmental disability, significant mobility impairment, post-traumatic stress disorder (PTSD));

   - **Individual Targeted Disabilities (12):** In addition to the total number of PWTD, each of the twelve targeted disabilities is tracked independently; and

- **PWD**: All individuals who identified as having a disability or serious health condition (including targeted disabilities).

TABLE 11: FY 2024 Populations and Participation Rates of PWD, PWTD & Disability-Related Groups

		OPM Code	Population	Participation Rate (%)
1	**No Disability (or did not self-identify)**	**05**	**9388**	**70.23**
2	**Do Not Wish to Identify ("Not Identified")**	**01**	**437**	**3.27**
3	**People With Disabilities (PWD)**	**02-03, 06-99**	**3543**	**26.50**
4	**People With Targeted Disabilities (PWTD)**	**(See Below)**	**523**	**3.91**
5	Developmental Disability	02	22	0.16
6	Traumatic Brain Injury	03	53	0.40
7	Deaf or Serious Difficulty Hearing	19	105	0.79
8	Blind or Serious Difficulty Seeing	20	52	0.39
9	Missing Extremities	31	8	0.06
10	Significant Mobility Impairment	40	36	0.27
11	Partial or Complete Paralysis	60	14	0.10
12	Epilepsy or Other Seizure Disorders	82	20	0.15
13	Intellectual Disability	90	7	0.05
14	Significant Psychiatric Disorder (e.g., PTSD)	91	201	1.50
15	Dwarfism	92	0	0.00
16	Significant Disfigurement	93	5	0.04

[74] If an employee does not self-identify at all (i.e., does not fill out OPM Standard Form 256 or similar onboarding documentation), their status defaults to "I have no disability or serious health condition."

Unlike race/national origin/sex groups (for which there are no numerical goals or targets), federal agencies *must* establish numerical goals for both PWD and PWTD. Federal goals[75] require at least:

- 12% PWD, both at (a) GS-10 and below and (b) GS-11 and above,

- 2% PWTD, both at (a) GS-10 and below and (b) GS-11 and above.

In FY 2024, GSA formally adjusted its internal PWD/PWTD participation goals to reflect its consistent high performance in the participation of PWD and PWTD. The agency raised its PWD participation goal from 18% to 24% and its PWTD goal from 3% to 4%, effectively aligning its official targets with the agency's actual workforce representation rates.

Barrier Analysis Process

MD-715 requires agencies to systematically identify, validate, and investigate disparities, known as triggers, to determine whether their *root causes* are barriers to equal employment opportunity. When disparities are identified, instead of focusing on eliminating the *disparities* (e.g., through increased hiring of groups perceived to be "under-represented"), the *EEOC Instructions require agencies to investigate the disparities, to determine their underlying conditions and root causes*.

Specifically, the barrier analysis process involves:

1. **Validating the trigger** – ensuring the disparities are not due to inaccurate or incomplete data, irrelevant benchmarks, or other reasons unrelated to discrimination;

2. **Conducting root cause analysis** – determining why the demographic disparity exists; and

3. **Determining if a barrier exists** – and whether it is job-related and consistent with business necessity. [76]

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[75] *See* 29 CFR § 1614.203(d)(7).

[76] *See* MD-715 Instructions, Section II.II.B - Job-Related and Consistent with Business Necessity, "MD-715 only requires agencies to eliminate barriers if they determine that the barrier is not job-related." For example, a medical degree and license for a physician position are job-related qualifications; however, a requirement for an employee in an administrative position to be able to proficiently use a firearm would likely constitute an unnecessary barrier. In the case of individuals with disabilities, the agency must also conduct further analyses, to determine if the applicant or employee can satisfy the qualification standard, test, or selection criterion, if provided a reasonable accommodation.

If a barrier is not job related or lacks business necessity, it must be eliminated. If a barrier is job-related, agencies must explore whether the circumstances surrounding the situation can be modified to reduce its potentially discriminatory impact.

Importantly, MD-715 does not require agencies to take actions aimed at achieving demographic parity. Instead, the focus is on identifying and addressing actual discriminatory barriers – not correcting statistical imbalances.

Benchmarking (and its Limitations):

In FY 2024, GSA's trigger analyses used both internal and external benchmarks specified by the EEOC.[77] Internal benchmarks included demographic profiles of comparator groups, such as the entire agency, peer SSOs, occupational series, and grade levels, as well as feeder pools[78] for key employment life cycle events (e.g., promotions, hires, separations). For disability-related analyses, internal benchmarks included both GSA's own participation goals and actual participation rates for PWD and PWTD.

External benchmarks included:

- **Census-derived comparators**[79] (e.g., the National Civilian Labor Force (NCLF), occupation-specific CLFs, and regional CLF data),

- **Federal disability participation goals** (12% for PWD and 2% for PWTD); and

- **Government-wide disability participation averages** (in limited cases).

Limitations and Challenges of Benchmarking

While benchmarking is a critical component of trigger analysis, it has several limitations:

- **Potential for False Triggers:** Data and benchmarks may be incomplete, inaccurate, and/or otherwise irrelevant. Apparent disparities may stem from these limitations rather than actual barriers, necessitating further validation before conclusions are drawn.

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[77] *See* EEOC Instructions, Section II.II.A.

[78] Feeder pools are composed of all employees eligible for particular employment opportunities. For example, selections to merit promotions are made from feeder pools consisting of individuals who (1) applied, (2) were found eligible and qualified, and (3) who were referred for consideration. The feeder pool would *not* include anyone who did not apply, or applicants who were subsequently found to be ineligible or unqualified, and/or who were ultimately not referred. *See* EEOC Instructions, Section II.I.D.

[79] For FY 2024 reporting, EEOC directs agencies to generate CLF benchmarks by using the 2014-2018 American Community Survey 5-Year Data. *See* Census.gov tables EEO-CIT02R and EEO-CIT02W.

- **Census Benchmark Relevance:** Census data is often of limited relevance due to the specific characteristics of GSA's workforce (e.g., occupational series, geographic distributions, education levels). For example, a lower representation of a demographic group at GSA compared to the NCLF may not indicate a barrier, because the NCLF includes demographic statistics of occupations that are not relevant to the agency.

Complexities with Race Data: Reallocation Issues

One particularly significant issue relates to *multiple-race* responses and Census benchmarks:

- OMB[80] and EEOC[81] guidance require responses of individuals who identify using *White plus one other race* (e.g., White + Black or African American, White + Asian, or White + American Indian or Alaska Native) to be reallocated to the *other race* category (e.g., White + Asian must be categorized as Asian (and not as Two or More Races)).

- GSA workforce data adheres to this guidance. However, current Census data does not include *White plus one other race* subcategories, preventing equivalent reallocations.

  - The 2010 decennial Census data[82] supported such reallocations.

  - The 2014-2018 American Community Survey (ACS) EEO Tables,[83] mandated for MD-715 use, omit those subcategories. In other words, they do not include subcategories for responses of (1) White + Black or African American, (2) White + American Indian or Alaska Native (AIAN), or (3) White + Asian.

As a result, the pre-populated NCLF benchmarks used in EEOC's current MD-715 templates incorrectly reallocate all *White plus one other race* responses to the Two or More Races category, creating a significant artificial increase in the Two or More Races benchmark figures and similarly artificial decreases in the benchmarks for the Black or African American, Asian, and especially AIAN comparators. The key effects are:

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[80] *See* OMB BULLETIN NO. 00-02 – Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement, Section II, "Federal agencies will use the following rules to allocate multiple race responses for use in civil rights monitoring and enforcement: *Responses that combine one minority race and white are allocated to the minority race"* [emphasis added].

[81] *See* EEOC Instructions, Section II, Appendix 1, which states, "Please remember that White and any other EEO group (Black, AIAN, and Asian) should be combined with the non-White EEO group."

[82] *See* Census Table EEO-CIT02R (2006-2010 5-year American Community Survey), cells O6, P6, and Q6.

[83] *See* Census Table EEO-CIT02R (2014-2018 American Community Survey) Occupation by Sex and Race/Ethnicity for Residence Geography.

- The Two or More Races NCLF benchmarks are approximately *184% too high*;

- The AIAN NCLF benchmarks are *51% too low*;

- The Black or African American NCLF benchmarks are *8% too low*; and

- The Asian NCLF benchmarks are *3% too low*.

This misallocation significantly distorts benchmarking for affected groups. Though GSA raised the issue with EEOC and Census in 2023 and 2024, no updated guidance was received.

To improve accuracy, GSA developed an interim strategy using 2010 reallocation rates applied to 2014-2018 ACS CLF Data. This method approximates benchmarks that align with both EEOC Instructions and the OMB guidance in effect at the start of FY 2024.

Ongoing Uncertainty in Standards

In March 2024, OMB rescinded its prior reallocation guidance in a revision to OMB Statistical Policy Directive No. 15 (Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity), without issuing replacement instructions for handling multiple-race responses. Agencies have until 2029 to transition to the new standards. In the meantime, both old and new processes will coexist, adding complexity to data comparisons.

Further complicating this situation, the EEOC's NCLF figures (pre-populated into their MD-715 template) do not follow either the former OMB guidance or current EEOC Instructions (as they reallocate *all* multiple-race responses into the Two or More Races category)**.**

Additional Data Quality Issues

Beyond benchmark misalignment, other challenges impact GSA's ability to perform reliable workforce analysis:

- **Low Applicant Self-Identification Rates:** When *employees* leave their disability data blank, it defaults to "No Disability," and cannot be distinguished from instances where employees self-identified as having no disability; however, when *applicants* leave their disability data blank, those forms remain blank, so GSA can therefore distinguish between those who left their forms blank and those who self-identified as "No Disability." Because that distinction can be made, GSA can accurately determine the exact rate at which *applicants* self-identified their disability status. In FY 2024:

- o <u>Only 10% of applicants self-identified a disability status</u> during the application process. In FY 2024, 90% of applicants left their optional "self-identification of a disability" forms blank. Only 9% of internal competitive promotion applicants and 11% of new hire applicants disclosed disability status information.

- o <u>By contrast, 86% of applicants self-identified their race or ethnicity</u> during the application process.

- **Employee Data Gaps**:

  - o Some employees lack race/ethnicity data, due to lags following onboarding.

  - o As of FY 2024, another challenge to maintaining accurate race/national origin and disability data is related to *self-service* options within the employee data system of record. The system allows employees to update (and in some cases *delete*) demographic data via a self-service portal.

    - Employees can delete race/ethnicity data, creating data gaps; and

    - Schedule A(u) employees can incorrectly modify disability codes, leading to misclassification.

- **Race/Ethnicity Defaults:**

  - o If new employees fail to self-identify, the system automatically defaults their race/ethnicity to *White* (and ethnicity to Not Hispanic or Latino). ███████ ██ ██ This does not follow regulations[84] and contributes to reported deficiencies related to data accuracy.

  - o Employees are notified of this possibility during onboarding; however, the system does not track if or when such defaults are applied.

  - o ███ ███ the scope cannot be fully quantified without new procedures and system validations.

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[84] *See* [29 CFR § 1614.601(b)](#) - EEO group statistics.

- **Underreporting of Disability Status:**

    o Evidence suggests disability underreporting is especially common among:

    - Disabled veterans (who can be identified via other data),

    - Employees over 64,

    - Individuals in certain occupational series, and

    - Employees in higher grade levels.

Additional Data Limitations and Expanding Sources of Insight

Subjectivity in Applicant Self-Assessments:

Separate from issues with self-identified demographic data, barrier investigations related to the selection process can be negatively impacted by *other subjective applicant inputs*. A primary example relates to when applicants for employment self-assess their job qualifications as part of application questionnaires. In those cases, some applicants may answer the questions more conservatively (thus, lowering the system's relative scoring of their qualifications), while other applicants may be more generous with their self-assessment answers (resulting in scores that make it appear that they have higher qualifications than their peer applicants who answered more conservatively).

- **Impacts on Selection Process Outcomes:** When less-qualified applicants overstate their qualifications, it can directly impact which applicants are subsequently categorized as best qualified, well qualified, or merely eligible, and in turn, result in differences in associated process outcomes, including referrals, interviews, and selections. In some cases, <u>advancement of those less-qualified applicants to the referral phase may have prevented other, more qualified applicants from progressing in the selection process</u>. Critically, the groups most negatively impacted by this issue are also likely to remain unknown, as they are inherently less likely to be referred.

- **Identifying Overstated Qualifications:** Instances of overstated qualifications are typically identifiable only in limited situations, and then only as lagging indicators, such as when referred applicants are subsequently interviewed, and found during their interviews to lack knowledge, skills, and/or abilities (KSAs) that align with their respective self-ratings (e.g., claiming to be "Expert" when they are not, or claiming to have "Advanced Experience" when they do not).

- o **Applicant Eligibility Analysis:**

  - Because applicant *eligibility* determinations are relatively objective (i.e., are generally less likely to be discriminatory), ineligibility rates can offer additional insights between applicant perceptions and selection process realities. Previous analysis of multiple years of GSA applicant flow data for mission-critical occupations found that the same demographic groups that had the lowest rates of selection also had the highest overall rates of ineligibility.

  - Because that analysis benchmarked selection rates against the rates among "best qualified" applicants, those outcomes support a hypothesis that the same demographic groups that apply to positions for which they are ineligible may also be more likely to overstate their qualifications; however, that does not address known veterans preference impacts on qualification ratings or relationships between veteran status and affected demographic groups. Further analysis is planned in FY 2025.

- **Compounded Triggers:** Subjective self-qualifications can also lead to compounded triggers and/or additional triggers.

  - o **Impacts on Benchmarking:** Individuals who overstate their qualifications (relative to other applicants), are expected to have higher *referral* rates than those who do not. Because referral rates are often the benchmark for selection rates,[85] groups with high referral rates are generally expected to also have high selection rates; however, if the interview and vetting processes function ideally, individuals who overstate their qualifications would ultimately be expected to have *lower* selection rates (i.e., during their interviews, they would be found to be less qualified than the other referred applicants who did not overstate their respective qualifications).

  - o **Artificial Triggers:** The combination of higher-than-expected referral rates and lower-than-expected selection rates creates an artificial trigger (i.e., one

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[85] Selection rates are ideally benchmarked against *interview* rates; however, GSA statistics on interviewed applicants are insufficiently complete to support barrier analysis. As such, GSA trigger identification and barrier analysis often use *referral* rates and/or *best qualified* rates as comparators for selection rates. During FY 2023 and FY 2024, interview statistics were captured for only roughly 25% of announcements.

that is not associated with a discriminatory barrier). Without further analysis (taking into account all relevant factors), this condition (trigger) might give less well-informed individuals the impression that certain groups are being *discriminated against* in the selection process.

- o **Self-Promotion:** Similarly, if certain groups tend to self-promote less than their peers,[86] the opposite would be true (i.e., they would be more likely to have both lower referral rates and higher selection rates, relative to relevant benchmarks). Without further analysis, this condition might give less well-informed individuals the impression that certain demographic groups are being *favored* in the selection process.

- o **Employee Perceptions:** Employee interviews and analyses of survey responses found exactly that: some employees claim that low selection rates for certain demographic groups "prove" that the selection process is discriminatory and that positive findings for other groups is "evidence" of favoritism. While GSA training and presentations on MD-715 consistently emphasize the differences between triggers and barriers, as well as the need for root cause analysis before conclusions can be reached, some employees (and former employees) appear generally reluctant to consider independent quantitative evidence that does not support their personal beliefs.

Incomplete and Inaccurate Data Elements

Independent of race, ethnicity/national origin, sex, and disability status information, other inaccurate or missing data elements in the system of record also negatively impact workforce analysis and reporting. For example:

- ▪ **Interviewed Applicant Data:** GSA does not consistently identify, capture, maintain, or analyze data on which applicants were *interviewed* for internal competitive promotions or new hires. As "Interviewed Applicants" is the most relevant comparator against which to benchmark selections, incomplete Interviewed Applicant data negatively impacts all trigger identification efforts and associated barrier analyses related to the selection

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[86] ██ external studies ███ suggest that Females are less likely to self-promote than Males. *See* the Harvard Business Review articles Why Women Don't Apply for Jobs Unless They're 100% Qualified and Breaking Through the Self-Doubt That Keeps Talented Women from Leading.

process.[87] Additionally, the absence of data for Interviewed Applicants prevents completion of the MD-715 data tables and is an independently reportable Part G deficiency.[88]

- **Other Required Data Elements:** In addition to self-identified (and agency-designated) employee demographics, MD-715 also requires agencies to analyze or report on workforce composition and employment outcomes related to other data elements (e.g., permanent vs. temporary status, appointment authority codes, excepted vs. competitive service status, veterans preference codes, subordinate organizations, and other categories). Minor inaccuracies, internal inconsistencies, and/or missing data in those data fields negatively affects MD-715 analysis and/or reporting efforts.

FY 2024 Data Improvements

Despite the aforementioned deficiencies, GSA made significant *favorable* gains in recent years in its efforts to address various data shortfalls and expand data collection and analysis topics, all to better support MD-715 trigger identification, barrier analysis, and reporting obligations. In FY 2024, GSA made improvements in several data-related areas:

- **Career Development Data:** In assessing selections to career development opportunities, data was previously only available for applicants who had already been approved for program participation by their supervisors, and no data was available related to applicants who had been previously denied approval and/or who were not nominated by their respective first-line supervisors. In FY 2024, data for some career development programs was expanded, allowing identification of both (a) employee applications and (b) subsequent first-line supervisor approvals/nominations, as well as (c) program selections, enabling trigger identification at both of those precursor approval-stage milestones. This was insightful, as it showed significant numbers of FY 2024 applications to career development programs that do not appear to have been acted on by the first-line supervisors.[89]

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[87] Because data on *interviewed* applicant rates is incomplete, deeper barrier analyses into selection-related triggers often use *referred* applicant rates and/or *best qualified* applicant rates as relevant benchmarks.

[88] *See* MD-715 Part G, Measure C.4.c and EEOC Instructions, Section IV.II.F – Completion of Data Tables.

[89] Additional data and further analysis is required to determine if the applications were timely submitted by the employees and timely acted on by the supervisors. In many cases, career opportunities were not advertised with submission deadlines, and opportunities closed before supervisors could act on the approval requests. Overall, only a small fraction of requests were *denied* by first-line supervisors.

- **Mentoring Program Data:** In FY 2024, GSA centrally collected data on some mentoring program applications and selections, supplementing other internal career development data sets (e.g., details, temporary promotions, job shadowing opportunities) that were previously collected.

- **Expanded FEVS Analysis:**

  o In FY 2024, FEVS data offerings were further expanded, beyond (1) agency and (2) sub-organizational datasets and (3) responses of demographic groups (e.g., by leadership level, race, national origin, disability, sex, and age). The enhanced FEVS data now also includes responses grouped by (4) occupational series. Because many GSA SSOs have unique occupational compositions, the new series-specific data offers potentially useful insights into localized employee perceptions within particular SSOs.

  o In FY 2024, GSA added (5) *agency-specific* questions to FEVS, akin to those in "stay surveys." The use of those measures enabled GSA to capture information on key reasons (a) why current employees may have considered leaving, as well as (b) why they elected to continue with the GSA, supplementing information that was gathered from former GSA employees who participated in the GSA Exit Survey process.

Other Sources of Information

Separate from the triggers derived from analysis of (1) employee data, (2) applicant flow data, and (3) career development data, MD-715 requires agencies to also use (4) *other sources of information*[90] for both trigger identification and subsequent barrier identification efforts. Examples of other sources of information include exit survey responses, climate assessment survey results, and data related to harassment allegations, requests for reasonable accommodations, and grievances, as well as inputs from relevant barrier analysis focus groups.

Categorization of Other Information: Information from those other sources generally falls into one of two primary categories: *anonymous and/or aggregated* information or *personal/individual* information; however, some data sources can combine elements of both categories.

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[90] *See* EEOC Instructions, Section II.I, which states that "agencies need to explore other sources of data, including EEO complaint data, grievance data, exit interview data, results from surveys and focus groups, anecdotal evidence from various stakeholders, and reports from outside organizations." *See also* EEO MD-715, Part G Agency Self-Assessment Checklist, Measures D.1.b and D.2.d.

- **Anonymous and/or Aggregated Information:** For example, OPM's FEVS process is designed to anonymize all responses through aggregation, so that Personally Identifiable Information (PII) cannot be gleaned directly or indirectly from the response data.

- **Personal/Individual Information:** Formal EEO complaints and requests for reasonable accommodation are unique and specific to individuals, and cannot be anonymous; however, because that data is both PII and sensitive, it is only accessible to key HR and/or EEO professionals who have a job-related need-to-know, and when that data is compiled for reporting or presentation purposes, it is carefully aggregated and anonymized, to prevent the disclosure of PII.

- **Data Sources that Combine PII and Anonymous Information:** Some other sources of information bridge the divide between anonymous/aggregated information and personal/individual information. For example, exit surveys include space for unrestricted narrative participant responses, so it is possible for separating employees to allege discrimination or harassment, air grievances, and "name names" in their responses. In-person and/or virtual employee or group discussions may also result in information that identifies particular individuals by name or through other PII. When such data is captured in support of affirmative employment analyses, it is made accessible only to relevant HR and/or EEO professionals with a strict need-to-know.

Anecdotal Data and the Need for Validation: One key consideration of particular relevance to all *anecdotal* sources of information is the lack of formal vetting. Because the allegations raised in such forums may not be accurate, they must also be validated (similar to data triggers) before conclusions can be drawn. For example:

- **Complaint Volume:** EEO complaints, allegations of harassment, and grievances may be based on inaccurate perceptions, which could result in "false triggers;" however, while not all complaints, allegations, etc. may result in a finding of discrimination or harassment, the trigger identification process not only looks at complaint *outcomes* (e.g., findings) as a source of triggers, but also at complaint *volume*. For example, if there is a notable increase in the number of complaints (or allegations of harassment or grievances) by a particular group and/or related to a particular basis or issue, those situations would lead to a more thorough investigation, even if there are no formal complaint-related findings.

- **Anti-Harassment Surveys:** Three anti-harassment surveys were administered in FY 2024. One of the key lines of questioning asked participants if the anti-harassment procedures were neutral. Many participant responses indicated that the anti-harassment procedures were <u>not</u> neutral; however, upon further analysis, *those perceptions were found to be based on whether or not the survey respondent was an alleged victim or an alleged harasser* (i.e., alleged *victims* said that the process was not neutral because it was *biased toward management*, while alleged *harassers* indicated that the very same process was not neutral because it was *biased toward alleged victims*).

General Participation Triggers

GSA regularly evaluates a final category of triggers related to the voluntary participation of applicants and employees in discretionary employment opportunities, such as FEVS and exit surveys, self-identification of race/ethnicity/disability status, and the anti-harassment process, etc. (i.e., the extent to which groups participate (or do not), when given an opportunity to do so).

- **Survey Participation:** One key finding from the analysis of FEVS responses, pulse survey participation, and GSA exit surveys was that certain demographic groups participate in GSA surveys at notably lower rates than other groups. Critically, the demographic groups that routinely have the lowest FEVS, pulse survey, and exit survey participation rates are also the same groups that consistently have some of the least favorable employment outcomes.

- **Self-Identification of Race/National Origin:** Because employee race/national origin defaults to White if left blank, not only does that create accuracy issues ████████ ███ ██████████, but it also makes it impossible to determine the exact extent to which individual employees or demographic groups do (or do not) participate in the race/national origin self-identification process.[91]

- **Disability Self-Identification:** In certain cases, individuals with disabilities can be identified through other data (aside from self-identification), enabling rates of disability self-identification (and not identifying) to be accurately quantified. For example:

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[91] By contrast, *applicant* data is managed differently, such that demographic data fields that are not self-identified remain blank. GSA can therefore (1) identify those applicants who do not identify and (2) accurately calculate overall applicant self-identification rates (roughly 86% for race/national origin and approximately 10% for disability status in FY 2024).

- o **Schedule A(u) Appointees and Disabled Veterans** can be identified through analysis of Appointment Authority Codes and/or Veterans Preference Codes, so it is easy to identify those who did not voluntarily self-identify a disability.

- o **Employees over Age 64:** External benchmarking indicates potential underreporting of disabilities by employees over age 64, as the overall rate of self-identified disabilities among those employees is approximately one third the rate among the nationwide civilian population.[92]

- o **Self-Identification by Grade Level**: There are indicators that suggest that self-identification of disability status decreases as grade levels increase.

- ▪ **Low PWD Self-Identification vs. Low PWD Population:** Collectively, low disability-related self-identification rates create particular challenges to barrier analysis and elimination, as low *self-identification* by PWD cannot always be distinguished from actual low *participation* (i.e., it is difficult to determine if low PWD rates are due to low populations of individuals with disabilities, or if low PWD rates are due to low self-identification rates among populations that actually have a higher percentage of individuals with disabilities).

- ▪ **Participation in the Anti-Harassment Process:**

  - o **Anti-Harassment Intake and Coordination:** Another area assessed for participation is the GSA Anti-Harassment Program. Allegations of harassment may be reported directly to the Anti-Harassment Program, or they may be raised during the EEO complaints process. When allegations are raised to the EEO office, the Anti-Harassment Program is immediately notified, so that, regardless of how the agency is made aware of the allegations, the Anti-Harassment Program can quickly initiate a preliminary inquiry,[93] so that any adverse situations can be promptly addressed.[94]

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[92] *See* Pew Research Center article, 8 Facts about Americans with Disabilities and Census.gov 2022 American Community Survey 1-year estimates, Disability Characteristics.

[93] GSA's Anti-Harassment Procedures require supervisors or managers who are informed of, or otherwise become aware of, harassing conduct to initiate an inquiry within 10 days.

[94] *See* EEOC's Model EEO Programs Must Have An Effective Anti-Harassment Program, "it is important to understand that the EEO process and anti-harassment programs do not exist for the same purposes. The EEO process is designed to make individuals whole for discrimination that already has occurred through damage awards and equitable relief paid by the agency and to prevent the recurrence of the unlawful discriminatory conduct. *The internal anti-harassment program, on the other hand, is intended to*

- o **FY 2024 Analysis of Participation in Anti-Harassment Process:** Analysis of allegations of harassment in FY 2024 found that *many individuals who alleged harassment did not subsequently participate fully in the inquiry process*, limiting the agency's ability at effectively address the situation. Notably, the employees who alleged harassment in FY 2024, but who did not subsequently participate fully in the anti-harassment process were:

    - ▪ ██████████████

    - ▪ ████████████████████████████████████

    - ▪ Disproportionately PWD and/or PWTD.

Trigger Validation and Corrective Action Requirements: Most MD-715 analyses rely on comparisons between (a) actual agency figures and (b) relevant benchmarks, so if either the applicant/employee figures and/or their relevant benchmarks are inaccurate, the results may not be representative of actual conditions. Similarly, anecdotal triggers may be based on misperceptions. Therefore, after preliminary triggers have been identified, they must be validated as part of the root cause analyses. No conclusions can be reached and no "corrective" actions should be taken until:

1. The trigger is validated (i.e., found to *not* be caused by incomplete or inaccurate data);

2. The barrier investigation has been completed and a barrier has been identified; and

3. When identified, the barrier has been determined *not* to be both (a) job-related and (b) consistent with business necessity.

FY 2024 Triggers Reported as Barriers

GSA currently has three issues that were previously reported as discriminatory barriers, all of which are still manifested as FY 2024 triggers. Each of these three barriers is addressed primarily in Part J of the MD-715 report, as they all relate predominantly to persons with disabilities.

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take immediate and appropriate corrective action, including the use of disciplinary actions, to eliminate harassing conduct regardless of whether the conduct violated the law" [emphasis added].

1. **Untimely Conversions of Employees Appointed Under Schedule A(u):** The intention of the Schedule A(u) appointment authority[95] is to permit qualified persons with disabilities an opportunity to obtain civil service *competitive* status,[96] after first completing two years of satisfactory service in the *excepted* service under a non-temporary appointment.[97] Because the excepted service offers fewer employment opportunities than the competitive service, untimely conversion of eligible employees from the excepted service to the competitive service creates a barrier for PWD and PWTD. At the start of FY 2024, 44 eligible Schedule A(u) hires were overdue for conversion (down from 114 in FY 2023). At the end of FY 2024, 2 of those 44 employees remained overdue. Additionally, several other Schedule A(u) employees became conversion-eligible in FY 2024, but were not timely converted.

2. **Untimely Processing of Requests for Reasonable Accommodations:** Disability-related reasonable accommodations help enable qualified individuals with disabilities to enjoy equal employment opportunities. Timely processing of requests for reasonable accommodation requires agencies to establish and adhere to a maximum amount of time to either (a) provide an accommodation or (b) deny the request (absent extenuating circumstances).[98] MD-715 further requires agencies to annually assess their effectiveness and efficiency in timely processing requests for reasonable accommodation, using that timeframe as a benchmark.[99] In FY 2024, the GSA's overall processing timeliness rate for disability-related reasonable accommodations was 91%. While that figure represents a significant improvement from previous years (and a record high, up from 86% timely in FY 2023 and 62% in FY 2022), the EEOC standard is 100% (absent extenuating circumstances), and the ongoing untimely processing of reasonable accommodations remains an employment barrier for PWD and PWTD.

3. **Extended Non-Permanent Status:** Temporary and term appointments allow agencies to obtain employee services in cases where the need is known to be non-permanent.[100]

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[95] *See* 5 CFR § 213.3102(u).

[96] *See* Executive Order 12125 and Executive Order 13124.

[97] *See* 5 CFR § 315.709.

[98] *See* 29 CFR 1614.203(d)(3)(i)(M) and GSA Order HRM 2300.1A, Policy and Procedures for Providing Reasonable Accommodation, Chapter 2, paragraphs 8 and 9, pp. 21-22.

[99] *See* EEOC MD-715, Part B.III and EEOC Instructions to Federal Agencies for EEO MD-715, Part G Agency Self-Assessment Checklist, measure C.2.b.5.

[100] *See* 5 CFR § 316.

- **EEO Impacts:** With respect to EEO barrier analyses, employees in temporary or term status receive fewer benefits, have higher costs, and enjoy fewer and lesser employment opportunities than employees in permanent status. For example:

  - Quality Step Increases are only available to employees in permanent positions.[101]

  - To be eligible for conversion to the competitive service, Schedule A(u) employees must complete two years of satisfactory service under a *non-temporary* appointment.[102]

  - Employees must be in permanent status to be eligible to participate in career development opportunities (e.g., details, temporary promotions, job shadowing).

- **Scope:** In FY 2024, the GSA had 43 employees who had been in non-permanent appointments for in excess of 5 years, which is longer than typical temporary and term-limited appointment durations. A disproportionate number of those employees are PWD, and Schedule A(u) employees are present among that group at 250% their agency-wide rate. Long-term non-permanent employment constitutes a barrier for PWD and some race groups.

- **Sequential Non-Permanent Assignments:** One challenge in accurately assessing this situation relates to employee transitions *between* positions. It is known that some employees in non-permanent status have transitioned from one non-permanent position to another non-permanent position. While changing positions would "restart the clock" for individual appointments (i.e., each duration may be within prescribed limits), the impacts of the underlying issue (extended non-permanent status) would continue to result in limited employment opportunities for those involved. As such, this issue remains worthy of additional analysis.[103]

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[101] *See* OPM Fact Sheet: Quality Step Increase.

[102] *See* 5 CFR § 315.709(a)(1) - Appointment for Persons With Disabilities.

[103] Notable progress was subsequently made on this issue by OHRM in early FY 2025, after the conclusion of the FY 2024 reporting cycle, but before the submission of this MD-715 report, as part of OHRM's ongoing efforts to systematically address the Schedule A(u) barrier, manage future Schedule A(u) conversions, and update associated data in the employee data system of record. Due to those data corrections and to significant organizational changes in FY 2025, it is anticipated that this barrier will be closed out in FY 2025, as the underlying root causes will no longer exist.

Current Triggers:

GSA has triggers associated with each major demographic group[104] and at all significant milestones spanning the employment lifecycle. The most significant triggers for FY 2024 are:

- Disproportionate distributions of demographic groups across grade levels;
- Disproportionate distributions of demographic groups across occupational series; and
- Disproportionate employment outcomes across demographic groups.

TABLE 12: Summary of FY 2024 Triggers for Major Demographic Groups

Major Triggers Present in FY 2024	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Selections – New Hires to Mission-Critical Occupations (MCO)										
Selections – New Hires to High Grades										
Selections – Internal Competitive Promotions to MCOs										
Selections – Internal Competitive Promotions to High Grades										
New Hires (vs. Relevant Civilian Labor Force)										
External Career Development Selections										
Internal Career Development Selections – Details										x
Internal Career Development Selections – Temp Promotions										x
Awards – Cash ($1K-$4K)										
Awards – Cash (>$4K)										
Awards – Time off (1-20 hours)										
Awards – Time off (21-40 hours)										
Awards – Time off (>40 hours)										
Awards – Quality Step Increases										
Awards – Performance-Based Increases										
Separations – Removals										
Separations – Other										
Level 5 Performance Ratings									x	x
Allegations of Harassment									x	x
EEO Complaints – Per Capita Complainants									x	
Disciplinary Actions – Terminations During Probation									x	x
Disciplinary Actions – Warnings/Reprimands/Suspensions										x
Total Workforce (vs. Relevant Civilian Labor Force)										
GS Workforce – Grades GS14+										
GS Workforce – Steps									x	x
GS Workforce – Upwardly-Mobile Series									x	x
GS Workforce – Non-Permanent Employees									x	
Stalled Career Ladder Progression										
Participation in Federal Employee Viewpoint Survey									x	x
Participation in Exit Surveys										

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[104] MD-715 analyses and data uploads include all specified demographic groups; however, to save space in certain presentations, some tables and graphs in this report will omit results for the smallest GSA race groups (Native Hawaiian or Pacific Islander, American Indian or Alaska Native, and Two or More Races).

Disproportionate Distributions of Demographic Groups Across Grade Levels:

FIGURE 5: Grade Level Distribution of Major Demographic Groups
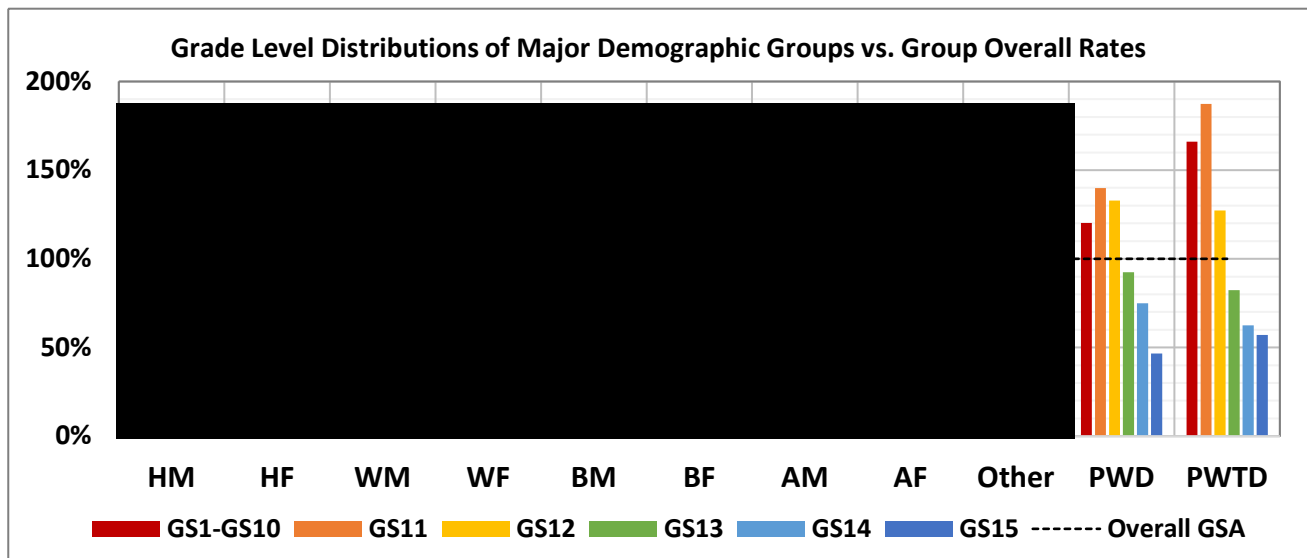
Roughly 12% of GSA employees are in grades GS11 and below, 28% are GS12, 29% are GS13, and 31% are in GS14 or higher.

Disproportionate distributions of demographic groups across occupational series:

Further analysis of grade-level disparities identified and explored the particularly complex inter-relationships between (1) employee demographics, (2) occupational series, (3) grade levels, and (4) performance ratings, as well as (5) employees who are veterans and disabled veterans.

Across GSA's 100 occupational series, there is a wide variation in the distribution of (a) grade levels and (b) demographic groups. For example, some occupations have high proportions of positions at grade levels GS14 or higher, while other series have relatively few (or even none) in those higher grade levels. Separately, *some demographic groups have high participation rates primarily in series that have the highest proportions of high grade level positions, while other demographic groups are disproportionately present mainly in those series that have fewer upward mobility options*. In FY 2023, preliminary analysis focused on GSA's 20 most populous series, which collectively account for 90% of all employees. In FY 2024, that analysis was expanded, to incorporate all series and grade levels, as well as data specific to each SSO.

Upward Mobility: The preliminary analysis examined the overall grade level distribution of the entire workforce, and simplified analysis by categorizing (a) positions as "low" grade levels (up to and including grade level GS13) and (b) "high" grade levels (grade levels GS14 and higher).

Tiers: All 100 occupational series were subsequently analyzed, to determine the percentage of their respective positions above and below that dividing line. Based on the overall series-specific distributions of positions at GS14 or higher, 6 "tiers" were categorized. A total of 41 series were found to have *no* positions at GS14 or higher, and were designated as Tier 1, while the remaining tiers were categorized as follows: Tier 2: up to 9.9% of positions at GS14 or higher, Tier 3: 10%-19.9%, Tier 4: 20%-29.9%, Tier 5: 30%-49.9%, and Tier 6: 50% or more.

TABLE 13: Overview of GSA Occupational Series Tiers

Series Tier	Upward Mobility (to GS14 or Higher)	Minimum % of Positions at GS14 or Higher	Maximum % of Positions at GS14 or Higher	Total Occupations	Total Employees (#)	Total Employees (%)
1	None	0%	0%	41	734	5.5%
2	Very Low	>0%	<10%	6	1397	10.5%
3	Low	10%	<20%	17	846	6%
4	Medium	20%	<30%	11	3717	28%
5	High	30%	<50%	11	5087	38%
6	Very High	50%	100%	14	1587	12%

Overall Employee Distribution within Tiers: Half of GSA employees were found to be employed in Tiers 1-4 (i.e., series with fewer than 30% of their respective positions at GS14 or above) and half are employed in Tiers 5-6 (i.e., occupational series with more than 30% of their positions at GS14 or higher). Five percent of GSA employees were found to be in series that have *zero* in-series opportunities above GS13.

FIGURE 6: Group Participation in Series Tiers, vs. Overall Participation Rates

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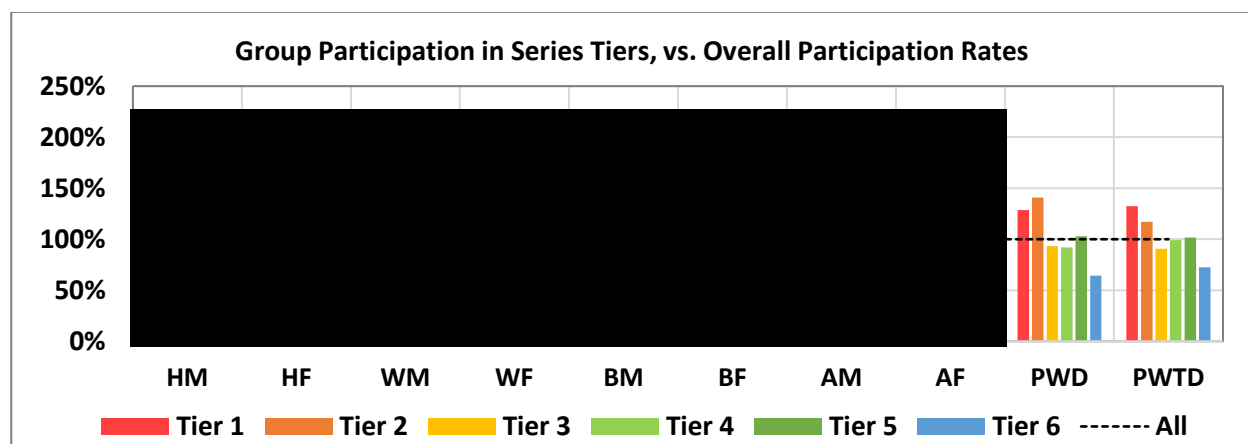
Demographic Distributions in Series Tiers and Occupations:

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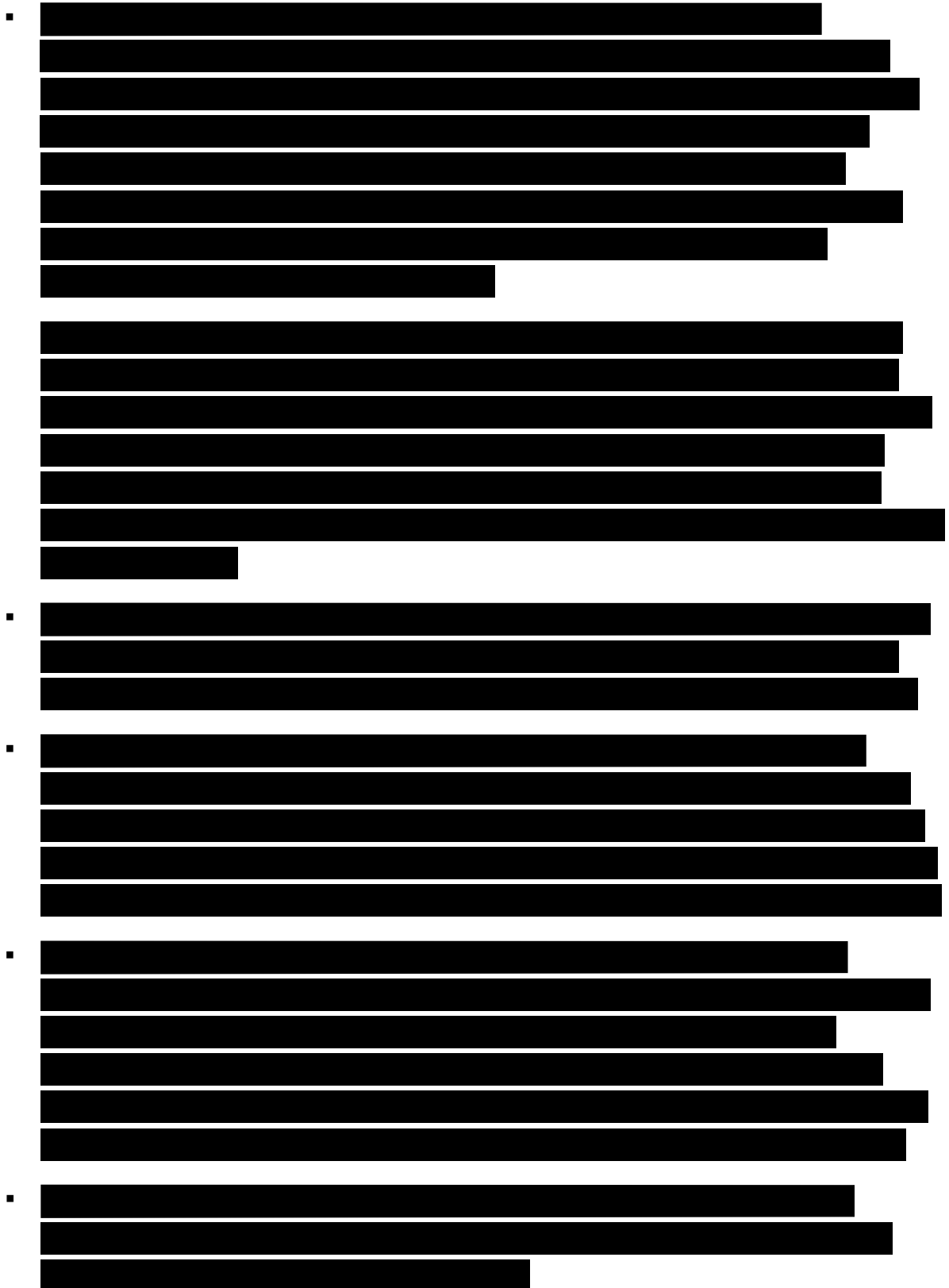
Demographic Distributions in Series Tiers and Occupations (continued):

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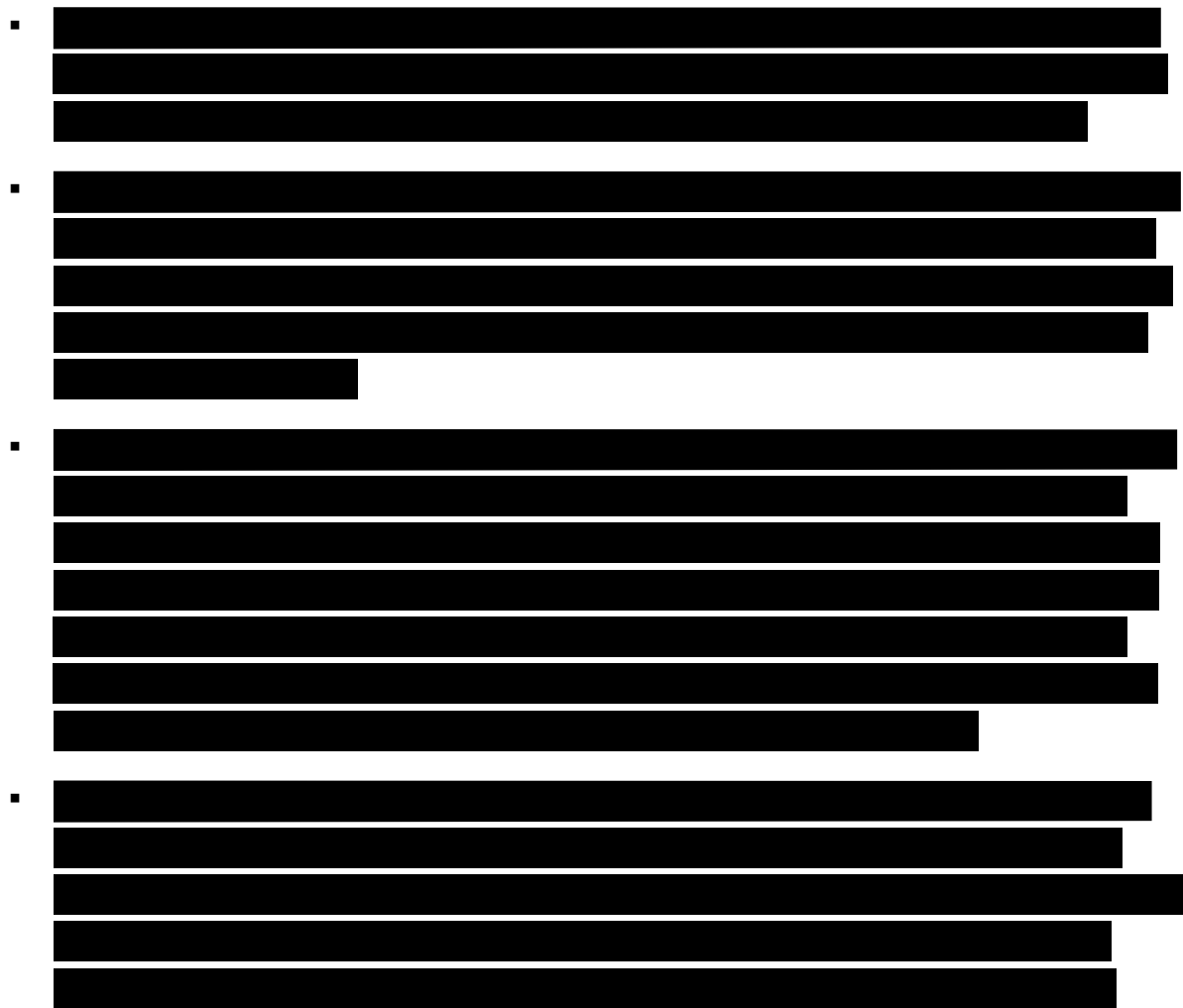
FIGURE 7: Series Tier Participation of Demographic Groups vs. Overall Group Rates

Series Tier Participation of Demographic Groups vs. Overall Group Rates

Legend: HM, HF, WM, WF, BM, BF, AM, AF, PWD, PWTD
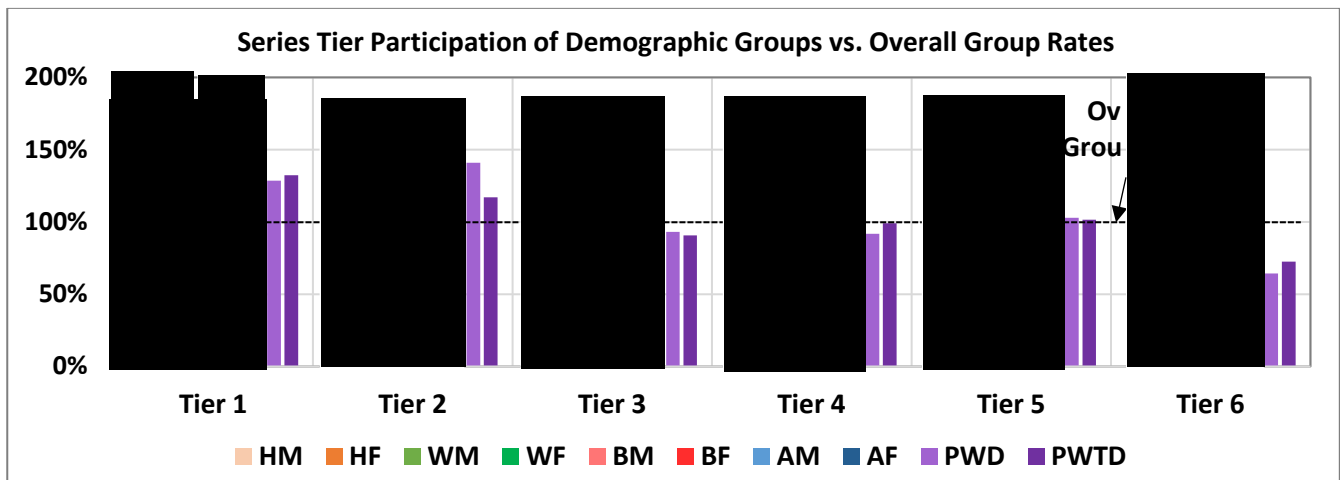
Disproportionate Employment Outcomes Across Demographic Groups:

FY 2024 trigger identification efforts analyzed (1) all standard employment groups and topics addressed in the MD-715 A/B tables and Part J, (2) other sources of information required by Part G (e.g., EEO complaint data, reasonable accommodations, harassment program data, grievances, exit surveys), as well as additional GSA-specific (3) routine and (4) ad hoc areas of interest, in support of comprehensive trigger identification and barrier investigations. Examples of the latter categories include analyses of employee performance ratings, disciplinary actions, career ladder progression, appointment authorities, status as veterans and disabled veterans, low self-identification of race/national origin and disability status, and intersectional analyses.

Certain analyses relate to *desirable* employment events (e.g., selections, awards) and other analyses focus on *undesirable* events (e.g., disciplinary actions, grievances, EEO complaints, harassment allegations). Each analysis focus area used unique relevant benchmarks and presents relevant findings such that **100% is the baseline**. <u>For desirable outcomes, rates at or above 100% are favorable and rates below 100% are triggers</u>. <u>For undesirable outcomes, the opposite is true</u>. Within the FY 2024 topic areas, each demographic group experienced different outcomes, across a spectrum, from largely favorable outcomes (i.e., high rates of desirable outcomes and low rates of undesirable outcomes) ████████████████████████ to predominantly unfavorable outcomes ████████████████████████ PWD/PWTD.

TABLE 14: Demographic Group Outcomes - Desirable Employment Events

Desirable Employment Events	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Selections - New Hires									64%	51%
Selections - Internal Competitive Promotions									72%	77%
Selections - External Career Development									100%	158%
Selections - Internal Details									92%	72%
Selections - Temporary Promotions									81%	67%
Level 5 Performance Ratings									83%	79%
Time Off Awards 31+ hours									116%	119%
Cash Awards $3K+									67%	58%
Quality Step Increases									47%	21%

TABLE 15: Demographic Group Outcomes - Undesirable Employment Events

Undesirable Employment Events	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Reprimands/Warnings/Suspensions									115%	274%
Removals/Resignations/Terminations									103%	581%
EEO Complaints									137%	416%
Grievances									142%	320%
Alleged Harassment									136%	460%
Stalled Career Ladders									212%	201%

Triggers typically remain consistent from year to year. Most triggers identified in FY 2024 were previously identified, systematically investigated, and documented in prior reports. Aside from the three aforementioned barriers, the FY 2024 investigative process did not associate any root causes with discriminatory policies, procedures, practices, or conditions. In some cases, particular investigative threads reached dead ends, due to running out of information and/or relevant data from which to draw actionable conclusions.

All major recurring triggers are reevaluated at least annually, in an ongoing, cyclic barrier investigation process designed to regularly and exhaustively explore all potential root causes. When new annual data or ongoing (i.e., mid-year) barrier investigations lead to identification of new triggers, they are thoroughly investigated. Comprehensive new data (e.g., MD-715 Part J and A/B Tables) is formally compiled and reported only annually; however, the investigative process continues throughout the year, focusing on the highest priority triggers. Additionally, wherever practicable, efforts are made to improve data accuracy, completeness, and access, and specifically to close data gaps that prevent progress or closure on barrier investigations.

Most MD-715 trigger analyses will not lead to the identification of barriers; however, in some cases, they will uncover issues unrelated to discrimination, such as program-related shortfalls. In such cases, issues are analyzed and possible modifications are identified and recommended to improve associated programs and potential employment outcomes for all demographic groups. For example, analysis of internal competitive promotion selection rates did not identify any discriminatory barriers; however, the analysis did determine that employees would benefit from additional training on resume writing and interview skills. To address the situation, optional training was made available in FY 2024 to all employees, to help all the training participants be more successful when applying to competitive employment opportunities. Similarly, when the investigative process identifies data gaps or other potential areas of improvement, OCR and OHRM collaborate to investigate, prioritize, and address the issues, whenever feasible.

When triggers are identified, circumstances are often so interrelated with other factors that they cannot be considered independently. For example, cash and time-off awards are directly related to performance ratings, and level 5 performance ratings are an eligibility prerequisite for Quality Step Increases. Additionally, when employees become eligible for awards, they are generally able to choose between time-off and cash awards. As a result, the figures for those data elements are inherently influenced not only by agency policies, procedures, and practices, but also by the choices of individual employees (i.e., a group may have a low rate of cash awards because they, not the agency, predominantly chose time-off awards, in lieu of cash).

Grade Levels and Performance Ratings:

Of particular significance are the complex interrelationships between (1) employee demographics, (2) occupational series, (3) grade levels, (4) performance ratings, and (5) veteran and disabled veteran status. Different occupational series have unique grade-level profiles, different demographic groups participate disproportionately in particular series (and associated series "tiers"), and there are clear relationships between performance ratings and grade levels. In combination, those circumstances likely contribute to many of the favorable and unfavorable employment outcomes for various GSA demographic groups.

FIGURE 8: Average Group-Specific Grade Level (GS Employees Only)
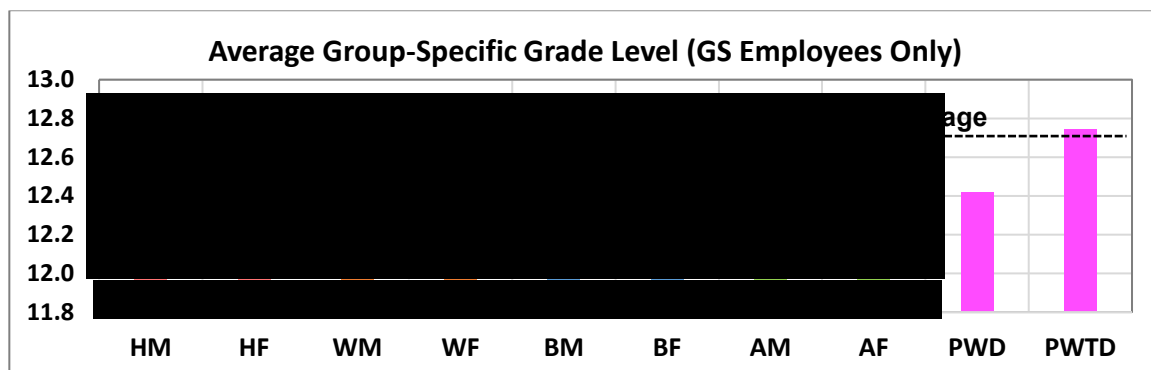
Grade Levels: The average GS *grade level* in GSA is 12.7 (i.e., between GS12 and GS13).

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FIGURE 9: Average Group-Specific FY 2024 Performance Ratings (GS Employees Only)
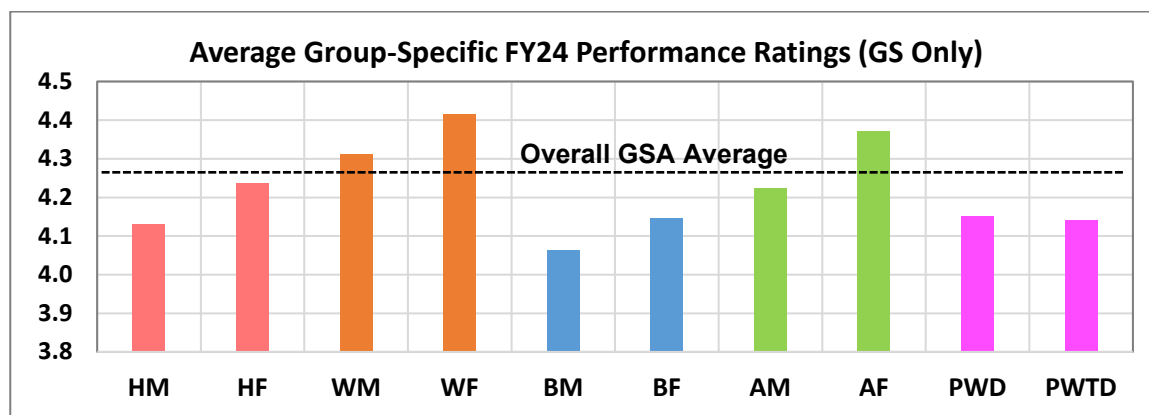
Performance Ratings: The average *performance rating* in FY 2024 for GS employees was 4.265 (out of 5). White Males, White Females, and Asian Females are the only demographic groups with average performance ratings above that figure. Analysis and comparisons of the relative statistics relating to (a) GS grade levels of demographic groups and (b) performance ratings of demographic groups resulted in several notable findings that help to further illustrate the intersectionality between demographic groups, occupational series, and grade levels:

- **Females:** In every major race/national origin category, Females have higher average performance ratings than the Males in their respective race/national origin categories.

- **PWTD:** While the overall average GS *grade level* for PWTD is higher than the GSA average, their overall average *performance ratings* are lower than average. Further analysis into this situation reaffirmed previously identified interrelationships between PWD/PWTD status, employee demographics, and veteran/disabled veteran status:

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PWD Rates:

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Tier Participation Rates:

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TABLE 16: Group Participation Rates among PWD/PWTD and Occupational Series Tiers, vs. GSA

Group	PWD	PWTD	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Tier 6
HM								
HF								
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Analysis of ███████████████████████████████████ **Supervisors/ Subordinates:**

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██ The analysis did not identify any noteworthy relationships between supervisor/subordinate demographics and performance ratings; however, it did identify two general patterns relating to *step* rates (e.g., GS12 *step* 10) and employee performance ratings. As expected, employees in steps 1-3 (i.e., usually newer employees) had lower average ratings than the typically more experienced employees in steps 4-9; however, unexpectedly, employees in step 10 were found to not only have notably lower average ratings that those in steps 4-9, but also lower average performance ratings than the employees in steps 1-3. This occurred in every grade level, except GS12.

Grade Levels and Performance Ratings:

Among the GS workforce, performance ratings tend to increase as grade levels increase.[107] This trend is particularly apparent in the grade level distributions of Level 3 and Level 5 performance ratings (both FY 2023 and FY 2024 data was analyzed and found to have very similar distributions). In summary, employees in the lowest grade levels received the highest proportions of Level 3 performance ratings and the lowest proportions of Level 5 performance ratings. On the opposite end of the grade level spectrum, employees in the highest GS grade levels had the lowest proportions of Level 3 ratings and the highest proportions of Level 5 performance ratings. Furthermore, that general relationship between employee grade levels and performance ratings was also identified during the aforementioned analysis of supervisor demographics, subordinate demographics, performance ratings, and steps.

TABLE 17: Performance Rating Distributions by Grade Level

Grade	FY24 Performance Rating		
	Level 3	Level 4	Level 5
GS15	3%	27%	70%
GS14	4%	35%	62%
GS13	10%	47%	43%
GS12	21%	57%	21%
GS11	29%	51%	18%
GS3-10	40%	49%	11%

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[107] The relationship between grade levels vs. performance ratings is not unique to the GSA. *See* Government Accountability Office report GAO-16-520R - Federal Workforce: Distribution of Performance Ratings Across the Federal Government (2013), Figure 5.

Mission-Critical Occupations and Performance Ratings:

Deeper analysis into these trends was undertaken by initially comparing average grade levels and average performance ratings for each of the twelve FY 2024 Mission-Critical Occupations (MCOs) reported in FY 2024. That analysis was subsequently expanded, to include GSA's top twenty most populous series (which collectively account for 90% of the GSA workforce). Additionally, that analysis also incorporated the series "tier" breakdowns, further illustrating the general relationships between series, grade levels, performance ratings, and upward mobility.

FIGURE 10: Average GS Grade Levels vs. Average Performance Ratings of the 20 Most Populous GSA Occupational Series (including GSA's 12 Mission-Critical Occupations (MCOs))
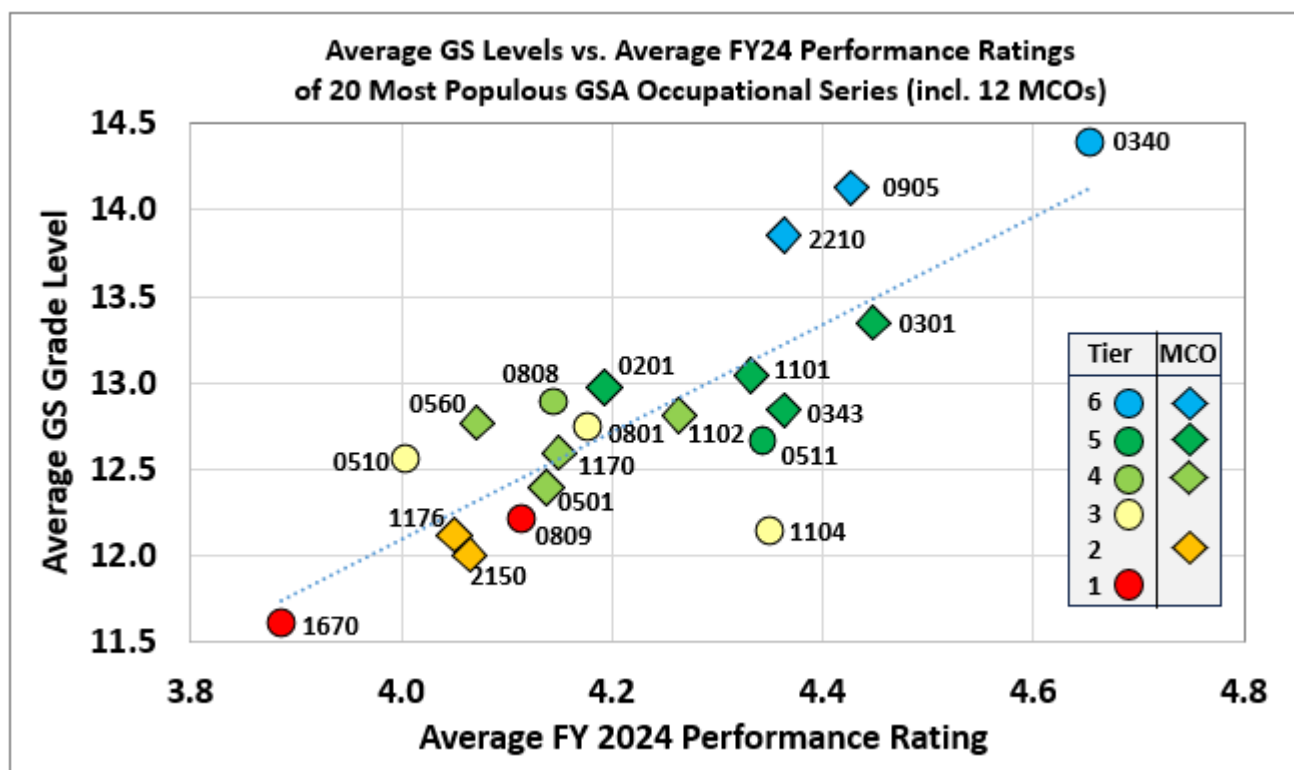
The plot of average grade levels vs. average performance ratings for the top 20 most populous occupational series shows that average performance ratings generally increase with grade level. The overall distribution, from lowest to highest average performance rating, begins with a Tier 1 series (1670) and ends with a Tier 6 series (0340); however, there are some series that fall out of the expected sequence. For example, the Tier 3 series 0510 has a lower average performance rating than two Tier 2 occupations (1176 and 2150) and one Tier 1 occupation (0809). Also, two Tier 3 occupations (0801 and 1104) each have higher average performance ratings than several Tier 4 and/or Tier 5 occupational series. For example, the Tier 3 series 0801 has higher average ratings than the Tier 4 series 0560, 0501, 0808, and 1170.

Among the 12 mission-critical occupations reported in FY 2024, 2 are from Tier 2, 4 are from Tier 4, 4 are from Tier 5, and 2 are from Tier 6. The 12 FY 2024 MCOs do not include any Tier 1 and Tier 3 series, because none of the prospective MCO candidate series in those tiers fulfilled the criteria to be designated as MCOs, due primarily to their relatively small series populations and/or limited in-series upward mobility opportunities (discussed further, below).

Designating MCOs: Prior to FY 2020, GSA reported 8 MCOs. When the list was expanded in FY 2020 to 10 series, the evaluation of potential additional candidate occupations carefully considered each of the 3 major criteria outlined in MD-715[108] and the EEOC Instructions[109]:

1. **Mission-criticality:** MD-715 frames "major occupations" (the precursor term to MCOs) as those that are "*mission related*;" however, the EEOC Instructions expand that to include "*those occupations without which the agency cannot fulfill its mission*."

2. **Size:** MD-715 defines MCOs as series that are "*heavily populated, relative to other occupations within the agency*" and the EEOC Instructions further focuses on series that are "*the most heavily populated relative to other occupations within the agency*."

3. **Career advancement potential:** MD-715 is silent on this particular criteria; however, the EEOC Instructions provide two different definitions, including occupations "*with career advancement potential*" and occupations that "*typically follow a career path to senior leadership positions*."

With respect to mission-criticality, GSA's mission encompasses an expansive range of services that require broad expertise in dozens of different occupational series, far beyond the limited number of MCOs (approximately 10) that are typically listed in annual MD-715 reports. Independently compiling and reporting data on all of the series "without which the agency cannot fulfill its mission" would be prohibitively time-consuming, as well as unlikely to provide a return on that investment, especially for series with relatively small populations.

With respect to considering MCOs based on population size, 5 GSA occupations have greater than 1000 employees and 20 series have more than 100 employees, while roughly half of GSA occupations have fewer than 10 employees. In the continuum of series sizes, after the 6 most populous series, there is no clear population "break point" above which to categorize series as MCOs. Additionally, many of the largest series have relatively low advancement potential.

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[108] *See* MD-715, Part C.III Appendix A.

[109] *See* EEOC Instructions, Section IV.II.F, Tables A/B 6 - Mission-Critical Occupations. *See also* Section II.II.A, Table A6 and Table B6.

With respect to <u>advancement potential</u>, the analysis of series tiers placed each GSA occupation into categories, according to their respective percentages of positions at GS14 or higher. In that analysis, the Tier 1 series were found to have no in-series opportunity to advance beyond GS13 and the Tier 2 and Tier 3 series were found to have only limited opportunities to do so.

Taking all of those factors into consideration, GSA elected in FY 2024 to further expand its MCOs, to include 12 of the top 13 most populous occupational series (skipping only the Tier 1 series 0809 – Construction Control Technical). In FY 2025, GSA will again reevaluate the number of MCOs, based on workforce changes and potential benefits to barrier analysis efforts.

TABLE 18: GSA's Top 20 Largest Series & MCO Designation – FY 2018 Through FY 2024

Series		FY24 Employees		FY18	FY19	FY20	FY21	FY22	FY23	FY24
1102	CONTRACTING	2306	17%	x	x	x	x	x	x	x
1101	GENERAL BUSINESS AND INDUSTRY	2095	16%	x	x	x	x	x	x	x
0343	MANAGEMENT AND PROGRAM ANALYSIS	1345	10%	x	x	x	x	x	x	x
2210	INFORMATION TECHNOLOGY MANAGEMENT	1180	9%	x	x	x	x	x	x	x
0301	MISC. ADMIN. AND PROGRAM	1113	8%	x	x	x	x	x	x	x
1176	BUILDING MANAGEMENT	917	7%	x	x	x			x	x
1170	REALTY	504	4%	x	x	x	x	x	x	x
2150	TRANSPORTATION OPERATIONS	362	3%							x
0501	FINANCIAL ADMINISTRATION AND PROGRAM	316	2.4%				x	x	x	x
0201	HUMAN RESOURCES MANAGEMENT	239	1.8%				x	x	x	x
0560	BUDGET ANALYSIS	239	1.8%				x	x	x	x
0809	CONSTRUCTION CONTROL TECHNICAL	206	1.5%							
0905	GENERAL ATTORNEY	191	1.4%	x	x	x	x	x		x
0801	GENERAL ENGINEERING	191	1.4%							
0510	FINANCIAL ADMINISTRATION AND PROGRAM	167	1.2%				N/A			
0340	PROGRAM MANAGEMENT	160	1.2%							
1670	EQUIPMENT SERVICES	146	1.1%							
0808	ARCHITECTURE	141	1.1%							
0511	AUDITING	129	1.0%							
1104	PROPERTY DISPOSAL	116	0.9%							

Analysis of PWD and PWTD Participation Rates & PWD-Related Data Issues:

Accurate analysis of employee disability status is complicated by (1) limitations of the employee data system of record, (2) a lack of comprehensive OPM and EEOC guidance (e.g., on how to implement regulations relating to agency classification of PWD and PWTD[110]), and (3) low rates of disability *self*-identification by GSA employees (vs. classification as PWD by the agency[111]).

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[110] *See* <u>29 CFR. § 1614.203(d)(6)(ii)</u>, which permits *agencies* to classify employees as PWD, based on appointment authorities that take disability into account and requests for reasonable accommodation. Neither OPM nor EEOC provide guidance on how to address conflicts between *self-identified* disability status and data from other approved sources, as permitted by regulation, (e.g., an employee claims to have No Disability, but was appointed under a 30% or More Disabled Veteran authority and has an approved reasonable accommodation for a targeted disability).

[111] Roughly 15.5% of GSA's PWD *self-identify* as such; an additional 11% were classified as PWD *by GSA*.

Disability Status Code 05 (No Disability):

A major challenge is created by OPM's use of Disability Status Code 05 ("I do not have a disability or serious health condition"), to indicate both (1) employees who *do not self-identify any disability status* and (2) those who *self-identify as having no disability*.

- **Default for Blanks:** Self-identification of a disability status is *always* voluntary; however, OPM requires every employee to have a Disability Status Code. To fulfill OPM's data requirement, when an employee chooses to *not* self-identify (e.g., skips that form during onboarding), their status is defaulted to Disability Status Code 05.

- **Self-Identification:** Disability Code 05 is the single most-used demographic code, accounting for more than 70% of all GSA employees; however, *there is no way to distinguish between the Code 05 entries that indicate blanks and the Code 05 entries that indicate self-identification*. That makes it impossible to:

  - Quantify which employees with Code 05 did not self-identify;

  - Quantify which employees with Code 05 self-identified as having No Disability;

  - Analyze (and potentially address) the unique reasons and concerns of individuals who did not self-identify; and

  - Conduct targeted self-identification campaigns, focused on only those individuals who did not self-identify.

Disabled Veterans:

Analysis of appointment authorities and Veterans Preference Codes shows that GSA had at least 2,131 *disabled* veterans in FY 2024; however, analysis of Disability Status Codes found that only 688 of those disabled veterans (32%) self-identified a disability in the system of record, while the remaining 1,443 disabled veterans did not (and were therefore instead categorized as PWD by the agency, rather than through self-identification). Of the disabled veterans who did not self-identify a disability:

- **Disability Code 01**: A total of 469 disabled veterans *self-identified* using Disability Code 01 ("I do not wish to identify my disability or serious health condition"). Even though they have not self-identified their respective disabilities, that is still a favorable outcome, in the sense that *they have positively engaged in the self-identification process* (albeit without identifying a disability).

- **Disability Code 05**: Of particular concern, 974 (67%) of the known disabled veterans who did *not* self-identify are categorized in the system of record with Disability Code 05. This is an unfavorable outcome, for two main reasons:

  o It could mean that they left their forms blank; however, it does not indicate if it was due to concerns, or if it was because the forms were optional and skipping them saved time during onboarding); or

  o It could mean that *they knowingly self-identified using an inaccurate code* (i.e., Code 05 indicates that they have <u>no</u> disability), which might imply that they have concerns about self-identifying a disability; however, it does not indicate what their particular concerns might be).

- **Disabled Veteran Concerns:** Interviews with disabled veterans determined that some left their forms blank due to concerns about self-identification, while others did not complete the forms simply because they were optional (and not due to concerns). Among those veterans who were interviewed in FY 2024 about self-identification and potential concerns, many updated their disability status during their interviews, using the self-service interface of the system of record. Other veterans expressed fears of stigma or of being looked at differently by peers or supervisors; however, *employment*-related discrimination was not raised as a major concern. Some apprehensions related to perceptions that self-identification might negatively impact their ability to privately possess firearms or retain a security clearance.

TABLE 19: Veteran Distribution in Top 20 GSA Series, Arranged by Series Upward Mobility

Series	% Veterans
0340	9%
0905	15%
2210	17%
0301	20%
0511	7%
0201	24%
1101	23%
0343	16%
0501	15%
1102	26%
0560	21%
0808	14%
1170	18%
0510	20%
0801	13%
1104	43%
1176	39%
2150	54%
0809	47%
1670	49%

- **Veterans & Series Tiers:** Analysis of veteran distributions in occupational series identified very high rates of veterans and disabled veterans among the Tier 1 series (i.e., those with low advancement potential) and commensurately lower rates among all of the more upwardly mobile series tiers (and Tier 6 in particular), complementing previous analyses into the interrelationships between occupational series, grade levels, PWD and PWTD status, employee demographics, and status as veterans and disabled veterans.

Veteran Distribution and Identification of Disability Status:

Overall, veteran distribution was found to be concentrated both in the occupational series with the least advancement potential and within the lower grade levels. ███████ ██ Additionally, there is a strong relationship between PWD and/or PWTD status and veteran status, due to the large proportion (65%) of GSA veterans who are disabled veterans. Significantly, a high percentage (41%) of those employees who can be categorized as PWD[112] are disabled veterans who have not *self*-identified, but who can be identified independently as PWD, by using information from other data sources, such as appointment authorities for disabled veterans and/or by using Veterans Preference Codes associated only with individuals who have records indicating the presence of a service-connected disability.

TABLE 20: Veteran Distribution Among Grade Level and Major Demographic Groups

Vets % by Grade	TOTAL	M	F	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
ES/CA/SL/ST												20%	0%
GS15												45%	26%
GS14												56%	39%
GS13												68%	52%
GS12												66%	53%
GS11												70%	55%
GS3-10												54%	35%
												63%	48%

TABLE 21: Disability Status of Veterans & Schedule A(u), by Appointment Authority

Appointment Authorities	I do not have a disability	I do not wish to identify	Self-Identified PWD	Known *Unreported* PWD	
Active Schedule A(u)	4	8	170	12	7%
Converted Sched A(u)	15	41	261	56	6%
30% or More DV Appt Auth	109	68	89	177	67%
30% DV (by Vet. Pref. Only)	682	318	0	1,000	100%
VRA	128	31	42	159	79%
VEOA	363	66	105	429	80%
Subtotal	**1301**	**532**	**667**	**1833**	**73%**

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[112] The categorization of disabled veterans as PWD for MD-715 analysis and reporting is conducted outside the system of record and without making any changes to official employee data. Those categorizations are made in accordance with 29 CFR § 1614.203(d)(6)(iii) to improve the accuracy of relevant data in support of mandatory analyses and to fulfill associated reporting obligations.

Other Unreported Disabilities:

Aside from employees who are *known* to have unreported disabilities (e.g., disabled veterans), there are several other groups that are only suspected of having high rates of unreported disabilities (based on comparisons with external benchmarks,[113] internal peer groups, or on other relevant factors). Collectively, preliminary analyses suggest that those groups may include more than 1,000 additional employees with unreported disabilities:

- Employees over 64 years of age,

- Employees appointed prior to 2004,

- Employees in grade levels GS13 and higher (especially senior executives in the ES/CA/SL/ST pay plans), and

- Employees with Veterans Preference Code 3.[114]

Schedule A(u) Employees: The accuracy of disability status codes for Schedule A(u) employees is a special case. While self-identification is voluntary, OPM policy requires Schedule A(u) employees to have *accurate* disability codes. Specifically, OPM states that, if an employee has been appointed under the Schedule A(u) authority, either (1) *they* must furnish an accurate disability code, or (2) if they fail to disclose their disability, their *agency* is required to determine the appropriate code from employee records or medical documentation submitted to support the appointment.[115]

At the end of FY 2024, 68 Schedule A(u) employees did not have accurate disability codes. GSA has been systematically improving the accuracy and completeness of employee data for three years; however, the accuracy of Schedule A(u) disability codes was prioritized in FY 2024, along with related efforts to address untimely conversions of Schedule A(u) employees to the competitive service, and other data issues associated with Schedule A(u) employees.

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[113] *See* United States Census Bureau American Community Survey – S1810 Disability Characteristics.

[114] Veterans Preference Code 3 may or *may not* be related to a disability. That code confers eligibility due to a veteran's status as either (1) having a service-connected disability of 10 percent or more or (2) being a recipient of the Purple Heart, but *without* having a compensable disability of 10 percent or more.

[115] *See* Privacy Act Statement, OPM Standard Form 265, page 2, which states "Where employees hired under this authority fail to disclose their disability, the appropriate code will be determined from the employee's existing records or medical documentation submitted upon appointment."

Applicant Disability Self-Identification:

Independent of *employee* self-identification of disability status codes (which are maintained in the employee data system of record), *applicants* for employment (including GSA employees applying for internal competitive promotions) are requested to self-identify their disability status during the application process. Such "applicant flow data" is maintained separately from the employee data system, and there are independent MD-715 requirements to compile, manage, analyze, and report applicant flow data, as well as separate requirements to annually assess the applicant flow data for accuracy and completeness. As with its employee data, GSA has data shortfalls and other unique issues associated with its applicant flow data.

- **Handling Blank Disabilities:** Unlike the employee data system (which defaults to Disability Code 05 (No Disability) when the field is left blank), if an *applicant* does not self-identify, that field simply remains blank (i.e., it does not default to any particular disability status code, nor does it use data from the employee data system to obtain a correct code (e.g., when a current GSA employee applies for an internal competitive promotion)). As a result, in the case of applicant flow data only, GSA can accurately determine the percentage of applicants who chose to leave their self-identification forms blank. For the past several years, fewer than 10% of all applicants (including GSA employees applying for other GSA positions) have chosen to self-identify their disability status during the application process.

- **Capturing Multiple Disabilities:** Most employee interfaces used to collect disability status information (including OPM SF-256 and the GSA data system of record (HRLinks)) have historically only allowed applicants and employees to identify a single disability status code, regardless of how many disabilities they may wish to disclose. As a result, persons who wanted to self-identify multiple disabilities have traditionally had to choose one disability code to use at any time. In FY 2024, a new issue was encountered regarding applicant data. Recent changes to OPM's USAJOBS system expanded self-identification options, to allow applicants to identify more than one targeted disability. Because most data systems were previously designed to accommodate capture of only a single disability code, the ability to identify multiple individual targeted disabilities created data validation issues for some systems (including the EEOC's FedSEP system, which is used to upload MD-715 data).

Root Cause Analysis – Overview:

Trigger Identification Using Aggregated Data: Some triggers were identified by analyzing consolidated (aggregated) statistics for the entire agency. Others were identified through analyses of large subgroups, such as grade levels, occupational series, or SSOs. In each case, those aggregate triggers represent a combination of "highs" and "lows" from an entire group, rather than outcomes for individual employees. In some cases, outcomes for a small subset of individuals within a group will affect the overall results. Additionally, because of data aggregation, the "highs" of some individuals within a group can be offset by "lows" of other individuals within that same group, resulting in overall statistics that appear neutral (i.e., with no triggers). For those reasons, the trigger identification process may not have visibility of all potential barriers.

Categories of Root Causes: There are several major categories of *potential* root causes of MD-715 triggers, described below. Depending on the nature of a particular root cause, different actions are appropriate. Thus, <u>systematic investigation is always required</u>, to determine the actual root cause (or realm of potential root causes), <u>before any other actions are taken</u>.

Additionally, one trigger might have multiple root causes that fall in different categories. Notably, while the intent of trigger identification and barrier investigation is to identify and eliminate discriminatory barriers, <u>not all identified triggers are related to unlawful discrimination</u>, <u>nor will all barriers manifest as identifiable triggers</u>. The major categories of root causes include (1) data-related issues, (2) merit, (3) perceptions, (4) benign circumstances, and (5) discrimination (including both (a) lawful discrimination and (b) unlawful discrimination).

1. **Data Issues:** The trigger identification process uses agency data that may not always be complete and/or entirely accurate. Thus, <u>a critical next step in almost all root cause analyses is to validate the initial inputs, calculations, and resulting findings</u>. If the initial data is found to require correction or refinement, resolution of the data issues may either change the magnitude of the identified triggers or might eliminate the triggers altogether.

   o Because most MD-715 analyses rely on self-identified demographic information, if that data is not complete and accurate, trigger identification will be less effective.

   o Similarly, since analyses typically compare workforce data to relevant benchmarks, if the associated benchmark data is not complete, accurate, and relevant, the resulting findings may not be reflective of actual conditions. This is true of both external benchmarks (e.g., Census data, which is often not sufficiently relevant in its most aggregated form (e.g., National Civilian Labor Force) and internal comparators (which are usually derived from self-identified workforce data)).

2. **Merit:** This category includes situations where specific employment outcomes (favorable or otherwise) are related to an individual's performance, knowledge, skills, abilities, and/or conduct. Because data analyses generally use aggregated data, and benchmark the collective outcomes for an entire group, they typically do not identify or consider the merit factors of individual employees, nor do any analysis findings suggest that all members of a particular group have higher or lower merits than members of any comparator group. Examples of merit-related outcomes for individuals include:

   o An employee consistently and significantly exceeds performance goals, measures, and expectations throughout the year, and receives a Level 5 performance rating.

   o An applicant competes for an internal competitive promotion opportunity, and is selected on the basis of her relative abilities, knowledge, and skills, after a fair and open competition, which ensured that all applicants received equal opportunities.

   o An experienced and appropriately trained selection panel was convened, and followed GSA's *Candidate Selection Guidance for Selecting Officials*, to identify and recommend a candidate for selection, based solely on the requirements of the position and the applicant's relative abilities, knowledge, and skills.

3. **Perceptions:** This category includes situations where employment situations or outcomes and/or their respective root causes *are not fully understood*. Perceptions (e.g., in the form of survey responses, EEO complaints, allegations of harassment) can be triggers on their own (i.e., by directly identifying issues that may be discriminatory barriers or indirectly, through an uptick in complaints or a downward trend in survey participation). Perceptions can be favorable, neutral, or unfavorable; correct or incorrect (i.e., misperceptions); and can come from anyone (e.g., from employees (whether affected or not), supervisors or managers, or individuals analyzing the associated information). The following are examples of common workplace perceptions related to MD-715 triggers and barriers:

   o An applicant perceives that they were discriminated against, because they applied for a position, but were not selected. Note: In FY 2024, the selection process was highly competitive, with roughly only 13 selections for every 1,000 applicants to positions in mission-critical occupations.

   o A manager perceives that a particular race group is "underrepresented" within an organization.

- To accurately assess the participation rates of subgroups in an organization, a systematic analysis is required, usually involving PII data and typically requiring subject matter expertise, especially in effective benchmarking.

- In this case, the manager's perceptions may or may not be accurate; however, the only way to make an informed determination would be to contact the EEO office for guidance and assistance in benchmarking.

- <u>Except for PWD and PWTD, agencies should not set participation goals</u>.

o The same manager inappropriately believes that the correct course of action would be to hire more applicants from the group believed to be "underrepresented."

- This is a common misperception, with two key problems:

   o First and foremost, <u>no personnel actions should be made on the basis of race, as doing so is a prohibited personnel practice</u>[116] <u>and would violate the merit system principles</u>.[117]

   o Second, no action should be taken based on participation rates (i.e., "representation"), except to investigate related triggers, in order to identify potential barriers. <u>Only if a barrier is identified (and found not to be job-related and of business necessity) should further action be taken, and in that case, actions should be focused on eliminating the identified barrier</u>. **No actions should be taken to address perceived "underrepresentation."**

- In this example, a thorough root cause analysis might determine that the participation rate is low because of higher than expected *separation* rates (rather than lower than expected *hiring* rates). If the manager inappropriately undertook a discriminatory hiring action in a misplaced effort to address misperceptions about "representation," it would not only violate merit system principles, but *it would also <u>not</u> address the underlying high separation rates*. As a result, the high turnover would be expected to continue, unresolved.

4. **Benign Circumstances:** This category pertains to situations where outcomes are analyzed and not found to be related to discrimination. For example:

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[116] *See* [5 U.S.C. § 2302(b)(1)(A)](#).
[117] *See* [5 U.S.C. § 2301(b)](#).

- An employment opportunity is widely advertised to all GSA employees using multiple means, including those accessible to PWD; however, one particular demographic group has a very low application rate. Upon a thorough further investigation, no specific reasons, concerns, or other "red flags" are identified.

- Certain occupational series have inherently higher potential for advancement than other series (e.g., there are no positions in series 1670 above grade level GS13).

- When employment outcomes are interconnected, such as the way cash awards and Quality Step Increases are closely connected to performance ratings, the proximal issues may be circumstantial; however, there may still be deeper barriers that affect employment outcomes. For example, the award-related outcomes may be circumstantial (i.e., a direct result of performance ratings); however, a thorough barrier investigation would then look to determine if there are any triggers related to the performance rating distribution itself, and the analysis of performance ratings might then look into root causes related to grade levels, steps, and other factors.

- An actual analysis in FY 2021 ████████████████████ of ████████ Competitive Development Programs ███████████████████████████ ██ found that, not only was the selection process fair and open, but it had also been intentionally structured to minimize potential demographic-based discrimination. Ultimately, after a systematic barrier investigation, the triggers were found to be circumstantial, and the ████████████████ outcomes were determined to be based on merit, rather than discrimination.

5. **Discrimination:**

- **Lawful Discrimination:** This category pertains to circumstances in which the agency may (and in some cases, must) *lawfully* engage in actions that benefit particular groups and/or permit the agency to deviate from normal procedures, such as requirements to provide disability-related reasonable accommodations[118] (including personal assistance services) to qualified employees and applicants for employment, and obligations associated with veterans preference.[119] For example:

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[118] *See* Americans with Disabilities Act at 42 U.S.C. § 12112(b)(5).

[119] *See* U.S. Merit Systems Protection Board, Prohibited Personnel Practice 11: Violating Veterans' Preference, "Any employee who has authority to take, direct others to take, recommend, or approve

1. A qualified person with a disability is *appointed non-competitively* to a position in the Excepted Service, under the Schedule A(u) authority, and is subsequently converted non-competitively to the Competitive Service upon satisfactory completion of a two-year probationary period.

2. A disabled veteran who has a compensable service-connected disability rating of 30% or more applies for a position and has a passing examination score. Because they are a 30% or More Disabled Veteran, *ten points are added to their passing examination score*.[120]

3. A member of the military who is about to retire is *allowed to compete for a federal civilian job opportunity as if they were a status employee*, even though they are not a current or former federal civilian employee, based on the provisions of the Veterans Employment Opportunities Act of 1998.[121]

4. The agency uses the Direct-Hire Appointment Authority appropriately, to *non-competitively* appoint a new hire quickly, to meet a critical agency need.[122] More of GSA's employees (13,368 as of FY 2024) were appointed as direct hires (17%) than through any other appointment authority.

- o **Unlawful Discrimination:** This is a fundamental focus area of MD-715 and barrier analysis. Per MD-715, "Agencies have an ongoing obligation to prevent discrimination on the bases of race, color, national origin, religion, sex, age,

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any personnel action, shall not, with respect to such authority- (A) knowingly take, recommend, or approve any personnel action if the taking of such action *would violate a veterans' preference requirement; or (B) knowingly fail to take, recommend, or approve any personnel action if the failure to take such action would violate a veterans' preference requirement*" [emphasis added]. Veteran protections were added to Prohibited Personnel Practice 11 by the Veterans Employment Opportunities Act of 1998 (VEOA) (Public Law 105-339). Veterans' preference is defined in 5 CFR § 211.

[120] *See* 5 U.S.C. § 3309, "A preference eligible who receives a passing grade in an examination for entrance into the competitive service is entitled to additional points above his earned rating, as follows— (1) a preference eligible under section 2108(3)(C)–(G) of this title—10 points. (2) a preference eligible under section 2108(3)(A)–(B) of this title—5 points." They are also accorded a higher retention standing in the event of a reduction in force (*see* 5 U.S.C. § 3502). *See also* OPM Vet Guide for HR Professionals.

[121] Certain appointment authorities allow agencies to hire eligible veterans without competition (e.g., VRA, 30% or More Disabled Veteran) and the VEOA authority permits certain eligible veterans to compete for jobs that otherwise only would have been available to status employees; however, a Direct-Hire Authority can expedite hiring by *eliminating* veterans' preference.

[122] *See* 5 CFR § 337.201, Subpart B. *See* also footnote above, regarding Direct-Hire Authority impacts on veterans' preference, including competitive rating and ranking and the "rule of three" procedures.

reprisal and disability, and eliminate barriers that impede free and open competition in the workplace. As part of this on-going obligation, agencies must conduct a self-assessment on at least an annual basis to monitor progress, identify areas where barriers may operate to exclude certain groups and develop strategic plans to eliminate identified barriers." Examples of unlawful discrimination include:

1. A supervisor discriminates for a nominee to a career development opportunity, on the basis of the applicant's race.

2. A selecting official chooses an applicant, based on personal favoritism, rather than by following merit system principles and making a selection solely on the basis of relative ability, knowledge, and skills, after fair and open competition.

3. A supervisor discriminates against a candidate for a temporary promotion opportunity, based on their perception of the applicant's disability status.

4. An agency disregards a request from an employee who is hard of hearing to have Communication Access Realtime Translation (CART) service provide real-time captions of important upcoming virtual training, when doing so would not impose an undue hardship on the agency.

FY 2024 Workforce Analysis Recap:

Trigger Identification: In FY 2024, GSA conducted extensive and systematic data compilation and trigger identification efforts. Root cause analyses included new initiatives (e.g., analysis of mentoring selections, supervisor approvals of career development requests, and FEVS responses by series), as well as deeper investigations into triggers identified in previous fiscal years (e.g., differences in group participation rates in grade levels and occupational series, and differences in favorable and unfavorable employment outcomes for different demographic groups).

Barrier Investigation: No additional barriers were identified. FY 2024 analyses found some proximal root causes related to data issues, misperceptions, benign circumstances, and/or lawful discrimination; however, no triggers were found to be related to unlawful discrimination. Deeper barrier investigations of FY 2024 triggers are ongoing, and effective, collaborative barrier analysis is a FY 2025 priority focus area.

E.9 Accomplishments

In FY 2024, GSA had several noteworthy accomplishments related to EEO and MD-715:

- **FEVS:** The GSA achieved its highest-ever *agency score* and *overall ranking* in the Partnership for Public Service's "Best Places to Work in the Federal Government." GSA was named the 2nd Best Place to Work out of 26 mid-sized Federal agencies.[123]

  - GSA also had the highest *category-specific scores* of all mid-size agencies in Effective Leadership, Effective Leadership: Senior Leaders, Employee Input, Recognition, and Professional Development and the second-highest category-specific scores in Effective Leadership: Supervisors and Work-Life Balance.

  - GSA also distinguished itself among 459 Government *subcomponent scores*. Four GSA offices scored among the top 10% overall, and a total of nine GSA services and offices (out of sixteen total) scored among the top 15% overall.

  - Three GSA offices were among the top ten *subcomponent category scorings* in the Effective Leadership, Effective Leadership: Senior Leaders, and Employee Input categories and one GSA office scored first among all subcomponents in the latter category. Two GSA offices scored among the top ten subcomponents in the Recognition and Professional Development categories.

- **PWD & PWTD Participation:** In FY 2024, GSA further increased its rates of PWD and PWTD in the workforce, reaching all-time highs of 26.5% for PWD and 3.91% for PWTD, exceeding both the 12% and 2% federal goals for PWD and PWTD participation, respectively, as well as GSA's agency-specific goals of 18% and 3%, respectively. This was achieved through efforts focused on (a) educating employees about the importance of voluntary self-identification and how the agency uses the data, (b) systematic correction of disability codes of Schedule A(u) employees, and (c) working with veterans and disabled veterans to identify and address concerns that might be impeding more widespread self-identification. The FY 2024 gains represent the tenth consecutive year of rate increases and an overall 10-year increase of 170% for PWD and 279% for PWTD, much higher than the 16% increase in the overall agency population over the same period. In recognition of its progress, GSA further increased its agency-specific participation goals for PWD and PWTD to 24% and 4%, respectively (i.e., to double the corresponding federal participation goals).

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[123] *See* 2024 Best Places to Work in the Federal Government.®

- **Improved Self-Identification:** GSA made further progress in its efforts to improve employee self-identification of disability status. In FY 2024, employees categorized as having *no* disability[124] decreased by 3%, contributing to a corresponding 8% increase in employees categorized as PWD and a 5% increase in the percentage of employees who self-identify as PWTD. Thirty employees with disabilities who previously did not self-identify any disability status voluntarily updated their official disability information to identify as PWD, and 8 of those 30 employees subsequently self-identified as PWTD.[125]

- **Harassment Inquires:** GSA made progress in the timely processing of allegations of harassment. GSA continued to improve coordination between OCR and OHRM on the processing of allegations of harassment raised during the EEO complaints process and collectively achieved a record 95% timely initial inquiries (up from 87% in FY 2023).

- **Improved Coordination:** GSA eliminated a barrier and four related Part G deficiencies through improved collaboration between OCR and OHRM on the AAP for PWD.

- **Reasonable Accommodation:** Notable progress was made to address a barrier related to the processing timeliness of requests for disability-related accommodations. In FY 2024, overall timeliness increased to a record high of 91% (up from the previous record of 86% in FY 2023). To fully eliminate this barrier (and resolve its associated Part G deficiency), 100% of requests for reasonable accommodation must be timely processed.

- **Schedule A(u) Conversions:** Significant progress was made on the barrier related to timely conversion of Schedule A(u) employees from the excepted service to the competitive service. During FY 2024, GSA converted 95% of eligible Schedule A(u) hires identified as overdue for conversion.

- **Extended Non-Permanent Status:** As part of GSA's efforts to resolve the untimely conversions of Schedule A(u) hires, comprehensive data updates and corrections were initiated, resulting in improvements not only to the data related to Schedule A(u) employees, but also to relevant data associated with employees in non-permanent status (the focus of the fourth and final barrier reported in FY 2023). Progress was primarily made after the close of FY 2024 MD-715 reporting period, but prior to the submission of this report.

- **EEO Policy Statement:** GSA timely issued its annual EEO Policy Statement.

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[124] This categorization includes both (1) employees who did not self-identify *at all* (i.e., who left their respective self-identification forms blank) and (2) employees who self-identified as having no disability.

[125] Employees can only be categorized as PWTD through self-identification.

- **Mandatory Training Completed:** GSA managed completion of mandatory supervisor training and implemented effective employee/management engagement procedures to enable sustained achievement of 100% timely training for all GSA supervisors and managers on mandatory topics (e.g., anti-harassment, reasonable accommodations, EEO, and alternative dispute resolution).

  - **Supplemental Training:** Throughout FY 2024, OCR provided training to supervisors and employees on topics such as supervisory EEO responsibilities, civil rights, new employee orientation, settlement official training, and MD-715.

- **Engagement with Heads of Services and Staff Offices:**

  - **HSSO Snapshots:** OCR generated quarterly Heads of Services and Staff Offices (HSSO) Snapshots focusing on complaint activity topics (e.g., volume, issues, bases, costs, outcomes).

  - **Customer Engagement:** OCR conducted customer engagement meetings with major GSA SSOs to provide tailored feedback on complaints activity, alternative dispute resolution, affirmative employment obligations and progress, and other relevant EEO topics.

- **Collaboration on FEVS Analysis:** OHRM and OCR collaborated on data sharing and analysis of Federal Employee Viewpoint Survey response data, expanding and improving analyses of survey responses by individual demographic groups and SSOs, as well as occupational series (a new category introduced by OPM in FY 2024).

- **Resolution of Compliance Deficiencies:** GSA corrected 9 of 19 reported FY 2023 deficiencies and made notable progress toward resolution of 7 others, reducing the overall number of deficiencies reported in FY 2024 to 10 (a significant decrease from the 33 deficiencies reported in FY 2022).

- **State of the Agency Briefings:** OCR provided MD-715 State of the Agency briefings to GSA senior leaders, webinars for all GSA employees, and tailored briefings to key SSOs, as well as ad-hoc briefings to GSA subcomponents, programs, and other interested groups.

- **External Engagement:** GSA partnered with 49 external agencies, commissions, boards, services, and other entities to share best practices related to affirmative employment programs, including MD-715, benchmarking, barrier analysis, trigger identification, self-assessments, Census data, and other topics of interest.

E.10 Planned Activities

During FY 2025, GSA plans to continue and improve the regular, effective collaboration between OCR and OHRM to:

1. Promote systematic progress on agency plans to eliminate the reported EEO barriers:

    a. Eliminate untimeliness in (1) deciding requests for disability-related reasonable accommodations and (2) providing approved accommodations;

    b. Eliminate untimely conversions of eligible Schedule A(u) hires from the excepted service to the competitive service, including (1) elimination of the current backlog of eligible Schedule A(u) hires overdue for conversion to the competitive service and (2) timely conversions of Schedule A(u) hires who become eligible during FY 2025;

    c. Identify the accurate status of all employees currently categorized in the system of record as non-permanent, and address any instances where those designations are incorrect and/or exceed respective non-permanent appointment durations;

2. Make progress toward correction of all unresolved Part G compliance deficiencies;

3. Continue root cause analyses into disparities related to grade-level distributions, series distributions, and employment outcomes of demographic groups; and

4. Re-baseline relevant FY 2025 benchmarks, to reflect significant workforce changes (e.g., due to employee separations, reorganizations, and changes in SSOs), in order to support effective ongoing barrier analyses.
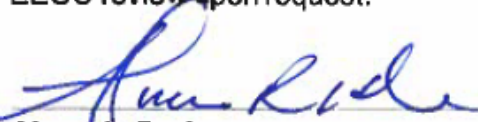
Part F – Certification of Establishment of Continuing EEO Programs

Aluanda Drain, Associate Administrator of the Office of Civil Rights, is the Principal EEO Official for the U.S. General Services Administration (GSA).

The agency has conducted an annual self-assessment of Title VII Section 717 and Rehabilitation Act 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 workforce 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.

5/7/2025

Aluanda Drain
Date
Associate Administrator, Office of Civil Rights

I certify that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

5/23/2025

Stephen Ehikian
Date
Acting Administrator, General Services Administration

Part G – EEO Program Self-Assessment Checklist

GSA conducted a mandatory annual assessment of agency EEO obligations by completing the MD-715 Part G Checklist and evaluating independent measures required in Part J. The Part G checklist is submitted to the EEOC via FedSEP and relevant supporting documentation and associated data is maintained within the GSA OCR.

For each Part G measure for which a deficiency is identified, the FedSEP system automatically creates an associated Part H plan, a blank template which the agency must then complete to document (1) the GSA official with responsibility over the measure found to be non-compliant, (2) planned activities that will be executed to resolve the deficiency, (3) target dates by which each planned activity will be completed, and (4) the target date by which the entire deficiency will be corrected. If any planned activities are not timely completed (i.e., in accordance with their respective target dates), (5) "modified dates" must be identified and documented, as well.

Because deficiencies are often interrelated, execution of certain planned corrective activities can sometimes simultaneously resolve multiple deficiencies, so some Part H plans therefore address several different Part G deficiencies. For example, Part H corrective plans H.1, H.2, and H.5 each address separate aspects of three different Part G deficiencies (associated with barrier analysis, workforce data, and applicant data, respectively), while Part H corrective plans H.3, H.4, and H.6 each address only a single deficiency.

In FY 2024, GSA is reporting at total of 10 Part G deficiencies (down from 19 in FY 2023 and 33 in FY 2022). During FY 2024, 9 previous deficiencies were resolved entirely and notable progress was made toward resolution of 7 of the remaining deficiencies. Collectively, the 10 deficiencies being reported in FY 2024 are addressed in a total of six Part H plans. Table 22 lists the 10 Part G measures identified as deficient, along with their respective Part H plans, after which follows the EEOC Part G Self-Assessment checklist in its entirety (156 measures).

Note: The FedSEP MD-715 template (including the Part G Self-Assessment) was last revised in 2017, and does not reflect the requirements of the more recent E.O. 14173 or associated OPM guidance memos (January 21, 2025 and February 5, 2025). Per EEOC direction, questions in the FedSEP Part G template that are no longer applicable are answered with "Not Applicable" (or "N/A") and annotated in the comments section of each associated compliance measure.

TABLE 22: FY 2024 Part G Self-Assessment Deficiencies

	Essential Element & Measure				Questions	Part H Plan(s)
					Has the agency allocated sufficient funding and qualified staffing to:	
1	B	4	a	2	Conduct a thorough barrier analysis of its workforce?	H.1
2	B	4	a	7	Maintain accurate data collection/tracking systems for workforce and applicant flow data?	H.2 & H.5
3	C	2	a	5	Are inquiries begun of all harassment allegations within 10 days of notification, including those initially raised in the EEO complaint process? What is the percentage of timely-processed inquiries?	H.3
4	C	2	b	5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? What is the percentage of timely-processed requests?	H.4
5	C	4	c		Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables?	H.2 & H.5
					Does the EEO office collaborate with the HR office to:	
6	C	4	e	4	Identify and remove barriers to EEO in the workplace?	H.1
7	D	3	b		If the agency identified barriers during the reporting period, did the agency implement a plan in Part I or Part J, including meeting the target dates for the planned activities?	H.1
8	E	1	a		Does the agency timely provide EEO counseling, pursuant to 29 CFR § 1614.105?	H.6
					Does the agency have systems in place to accurately collect, monitor, and analyze:	
9	E	4	a	2	The race, national origin, sex, and disability status of agency employees?	H.2
10	E	4	a	4	External/internal applicant flow data concerning applicants' race/national origin/sex/disability status?	H.5

MD-715 - PART G
Agency Self-Assessment Checklist

Essential Element A: Demonstrated Commitment From agency Leadership This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.			
Compliance Indicator ↓ Measures	A.1 – The agency issues an effective, up-to-date EEO policy statement.	Measure Met? (Yes/No/NA)	Comments
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)]	Yes	The 2024 EEO Policy Statement was issued by the former GSA Administrator on August 15, 2024. An updated EEO Policy Statement was drafted upon the appointment of the new Acting Administrator, both to comply with the MD-715, II(A) requirement that "[T]his statement should be issued at the beginning of their tenure," as well as to update the EEO Policy Statement language to align with E.O. 14168, E.O. 14173, and OPM Memo - Initial Guidance Regarding President Trump's E.O. Defending Women (January 21, 2025). At the time this MD-715 report was submitted, the new draft EEO Policy Statement was still in routing.
A.1.b	Does the EEO policy statement address all protected bases (age, color,disability, sex, genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	

Compliance Indicator ↓ Measures	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments
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, II(A)]	Yes	
A.2.a.2	Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]	Yes	
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 CFR § 1614.102(b)(7)]	Yes	Contact information is posted for EEO Counselors, Officers, and EEO Director; however, per OPM Memo - Further Guidance Regarding Ending DEIA Offices, Programs and Initiatives (February 5, 2025), Special Emphasis Program Manager contact info is no longer posted.
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)]	Yes	
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.	Yes	https://www.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation

Compliance Indicator ⬇ Measures	A.2 (CONTINUED) – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments
A.2.c	Does the agency inform its employees about the following topics?:		
A.2.c.1	EEO complaint process? [see 29 CFR § 1614.102(a)(12) and 29 CFR § 1614.102(b)(5)] If "yes", please provide how often.	Yes	All employees are informed during initial onboarding, as well as via regular training (required within 90 days of accession and biennially thereafter). Employees who are supervisors or managers also receive additional formal EEO training, which is required within one year of accession or assignment to supervisory/managerial 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.	Yes	Comment for A.2.c.1 applies.
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	Yes	Comment for A.2.c.1 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.	Yes	Comment for A.2.c.1 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.	Yes	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 Met? (Yes/No/NA)	Comments
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.	Yes	Complaint statistics are shared at least quarterly among Regional Administrators, and improvements and other EEO statistics are noted in the discussions. Annual meetings are held with HSSOs to discuss complaint activity, engagement in complaints processing, and alternative dispute resolution, as well as affirmative employment program efforts related to their respective service or staff office.
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, Subpart C]	Yes	

Essential Element B: Integration of EEO into the agency's Strategic Mission This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support 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 Met? (Yes/No/NA)**	**Comments**
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)]	Yes	
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.	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)]	Yes	
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, Section I.II.A.2]	Yes	
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.II.A.3)] If "yes", please provide the date of the briefing in the comments column.	Yes	May 14, 2024
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)]	Yes	

Compliance Indicator ➡️ ⬇️ Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments
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)]	Yes	
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR § 1614.102(c)(4)]	Yes	
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)]	Yes	
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR § 1614.102(c)(5)]	Yes	
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR § 1614.102(e); 29 CFR § 1614.502]	Yes	
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)]	Yes	
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) and (c)(3)]	N/A	GSA does not have subordinate reporting components.

Compliance Indicator ➡ ⬇ Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments
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)]	Yes	
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.	N/A	The "diversity and inclusion" language in this measurement (and the EEOC Instructions for Federal Agencies on MD-715) is not in alignment with E.O. 14173 or associated OPM guidance (January 21, 2025 and February 5, 2025). The GSA Strategic Plan is being updated accordingly. *EEO* principles were added to the GSA Strategic Plan on August 20, FY 2024, resolving a previously-reported deficiency with this measure.

Compliance Indicator → ↓ Measures	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
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)]	Yes	
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	No	See plan Part H.1.
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)]	Yes	
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.	Yes	

Compliance Indicator ➡ ⬇ Measures	B.4 (CONTINUED) - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
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.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)]	Yes	
B.4.a.6	to publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
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.	No	The processes for collecting and maintaining applicant flow data and employee demographic data do not provide the complete and accurate data required to support MD-715 analysis and reporting obligations. See Part H plans H.2 and H.5.
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 U.S.C. § 7201; 38 U.S.C. § 4214; 5 CFR § 720.204; 5 CFR § 213.3102 (u); 5 CFR § 315.709]	N/A	The language in this measure (and in the EEOC Instructions) is built into the current MD-715 template, and cannot be modified by the agency; however the existing language may not be in alignment with E.O. 14173 or associated OPM guidance (January 21, 2025 and February 5, 2025).

Compliance Indicator → ↓ Measures	B.4 (CONTINUED) - The agency has sufficient budget and staffing to support the success of its EEO program.	Measure Met? (Yes/No/NA)	Comments
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.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]	Yes	
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(1)(ii)]	Yes	
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
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)]	Yes	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
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?	Yes	
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?	Yes	

Compliance Indicator ⬇ Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications,and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Yes	
B.5.a.2	Reasonable Accommodation Procedures? [see 29 CFR. § 1614.203(d)(3)]	Yes	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
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)]	Yes	The language in this measure is part of the current EEOC FedSEP MD-715 template, and cannot be changed; however, it may not be in alignment with E.O. 14173 or OPM guidance (January 21, 2025 and February 5, 2025).
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)]	Yes	

Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	N/A	The language in this measure is part of the current EEOC FedSEP MD-715 template, and cannot be changed; however, it may not be in alignment with E.O. 14173 or OPM guidance (January 21, 2025 and February 5, 2025).
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes	
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]	Yes	
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [see 29 CFR § 1614.102(a)(5)]	Yes	

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY **This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.**			
Compliance Indicator → ↓ Measures	**C.1 – The agency conducts regular internal audits of its component and field offices.**	**Measure Met? (Yes/No/NA)**	**Comments**
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.	N/A	GSA has a centrally managed and operated civil rights program that assesses EEO program deficiencies agency-wide. 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.	N/A	Comment for C.1.a applies. Sub-organizational data is generated in MD-715 Data Table A/B-2. Data for all SSOs is generated and analyzed for triggers annually. Data for some SSOs, regions, and/or other sub-organizations is typically analyzed as part of ad hoc mid-year efforts to identify root causes.
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)]	N/A	Comment for C.1.a applies.

Compliance Indicator ⬇ Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
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, EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
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 Guidance on Vicarious Liability]	Yes	
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)]	Yes	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see EEOC Guidance on Vicarious Liability]	Yes	
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 EEOC Guidance on Vicarious Liability]	Yes	
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. Dept of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept 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.	No	Out of 57 harassment allegations raised in FY 2024, 54 (95%) received timely initial inquiries. See Part H plan H.3.
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)]	Yes	
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)]	Yes	

Compliance Indicator → Measures	C.2 (CONTINUED) – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
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)(i)(D)]	Yes	
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)]	Yes	
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)]	Yes	
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time, as established by the agency in its affirmative action plan? [see 29 CFR § 1614.203(d)(3)(i)(M)]	Yes	
C.2.b.5	Does the agency process all accommodation requests 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 in the comments.	No	Out of 216 FY 2024 requests for disability-related reasonable accommodations, 197 (91%) were timely processed. Fourteen requests (6.5%) were untimely decided, three (1.4%) were untimely provided after approval, and two (0.9%) were untimely due to a combination of both factors. See Part H plan H.4.
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 EOs, guidance, and standards? [see 29 CFR § 1614.203(d)(5)]	Yes	
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.	Yes	https://www.gsa.gov/directives-library/policy-and-procedures-for-providing-reasonable-accommodation

Compliance Indicator ⟶ ⬇ Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments
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?	Yes	
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]	Yes	
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)]	Yes	
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills? [see MD-715 Instructions, Sec. I]	Yes	
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR § 1614.102(a)(7)]	Yes	
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR § 1614.102(a)(8)]	Yes	

Compliance Indicator → ↓ Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity? [see MD-715, II(C)]	Yes	
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors, EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
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)]	Yes	
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)]	Yes	
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)]	Yes	

Compliance Indicator ⬆⬇ Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
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)(3) and MD-715 Instructions, Sec. I.III.D]	Yes	
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.III.D]	Yes	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR § 1614.601(a)]	No	Applicant flow data and employee demographic data have key accuracy and/or completeness issues that impact agency MD-715 obligations. See Part H plans H.2 and H.5.
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) and MD-715 Instructions, Sec. I.III.D]	Yes	

Compliance Indicator → Measures	C.4 (CONTINUED) – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
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); and MD-715 Instructions, Sec. I.III.D]	Yes	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C); and MD-715 Instructions, Sec. I.III.D]	Yes	
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C); and MD-715 Instructions, Sec. I.III.D]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C); and MD-715 Instructions, Sec. I.III.D]	No	See Part H plan H.1.
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C); and MD-715 Instructions, Sec. I.III.D]	Yes	

Compliance Indicator → Measures	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	Measure Met? (Yes/No/NA)	Comments
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 M.S.P.R. 280 (1981)]	Yes	
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.	Yes	Zero (0) employees were disciplined or sanctioned in FY 2024 for discriminatory conduct.
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? [see MD-715, II(C)]	Yes	

Compliance Indicator → ↓ Measures	C.6 – The EEO office advises managers/supervisors on EEO matters.	Measure Met? (Yes/No/NA)	Comments
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.	Yes	The principal EEO official provides agency senior leaders with a formal annual briefing covering the status and progress of the agency on efforts to meet all EEO-related obligations covered by MD-715. Additionally, various members of OCR engage independently with senior leaders and program managers on EEO matters, such as complaints, MD-715, and the AEP. Furthermore, OCR engages with the HSSOs quarterly via tailored communications related to complaint activity and affirmative employment and annually to provide comprehensive updates. Special emphasis programs are not discussed. The "special emphasis updates" language in this measure is part of the current MD-715 template, and cannot be removed by the agency; however, the language may not be in alignment with E.O. 14173 or OPM guidance (January 21, 2025 and February 5, 2025).
C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	

Essential Element D: PROACTIVE PREVENTION This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.			
Compliance Indicator **Measures**	**D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.**	**Measure Met? (Yes/No/NA)**	**Comments**
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
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]	Yes	All sources are used, except special emphasis programs and affinity groups. The "special emphasis programs" and "affinity groups" language in this measure is part of the current MD-715 template, and cannot be removed by the agency; however, the language may not be in alignment with E.O. 14173 or associated OPM guidance (January 21, 2025 and February 5, 2025).
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)]	Yes	The "inclusion" language in this measurement (and in related federal regulations and the EEOC Instructions) may not be in alignment with E.O. 14173 or associated OPM guidance (January 21, 2025 and February 5, 2025). "Inclusion" was removed from the GSA Exit Survey in FY 2025; however, the remaining language mandated by 29 CFR § 1614 has been retained.

Compliance Indicator ⬇ Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(D)]	Yes	
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); and MD-715 Instructions, Sec. I.IV.B]	Yes	
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); and MD-715 Instructions, Sec. I.IV.B]	Yes	
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.IV.B] If "yes", please identify the data sources in the comments column.	Yes	All sources are used, except special emphasis programs. The "special emphasis programs" language in this measure (and in the associated EEOC Instructions) is part of the current MD-715 template, and cannot be removed by the agency; however, the language may not be in alignment with E.O. 14173 or OPM guidance (January 21, 2025 and February 5, 2025). In addition to applicant, employee, and career development data, GSA also uses data and information from other relevant sources (e.g., FEVS results, requests for reasonable accommodations, allegations of harassment, grievances, performance ratings, EEO complaints, disciplinary actions), and key programs (e.g., Schedule A(u), career ladders, veteran status).

Compliance Indicator ⬇ Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments
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) and MD-715 Instructions, Sec. I.IV.C]	Yes	
D.3.b	If the agency identified barriers during the reporting period, did the agency implement a plan in Part I and/or J, including meeting the target dates for the planned activities? [see MD-715, II(D) and MD-715 Instructions, Sec. I.IV.C]	No	One barrier was eliminated and strong progress was made on two barriers; however, not all plans were executed as originally reported. See Part H plan H.1.
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D) and MD-715 Instructions, Sec. I.IV.C]	Yes	
Compliance Indicator ⬇ Measures	D.4 – The agency has an Affirmative Action Plan for Persons with Disabilities, including those with targeted disabilities.	Measure Met? (Yes/No/NA)	Comments
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR § 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	https://www.gsa.gov/reference/civil-rights-programs/office-of-civil-rights-library
D.4.b	Does the agency take specific steps to ensure qualified Persons with Disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR § 1614.203(d)(1)(i)]	Yes	
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)]	Yes	
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)]	Yes	

Essential Element E: EFFICIENCY This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.			
Compliance Indicator ⬇ **Measures**	**E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.**	**Measure Met? (Yes/No/NA)**	**Comments**
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR § 1614.105?	No	One complaint was counseled one day in excess of the 90-day limit. See Part H plan H.6.
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)?	Yes	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes	
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.	Yes	The average time to issue acceptance or dismissal decisions in FY 2024 was 50 days from the date of filing.
E.1.e	Does the agency ensure 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)?	Yes	
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR § 1614.108?	Yes	
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)?	N/A	All investigations were timely completed.

Compliance Indicator → ↓ Measures	E.1 (CONTINUED) - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR § 1614.110(b)?	Yes	
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)?	Yes	
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.	Yes	In the event that any contractor provides a poor work product, revisions are requested and carefully assessed. If systematic issues arise, such as inexcusable delays in processing times, the contract could be terminated and/or key personnel could be replaced.
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)]	Yes	Employees are held accountable for performance objectives through GSA's performance management process, consistent with merit system principles, due process rights, GSA policies, and applicable related requirements.
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)]	Yes	

Compliance Indicator → Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator
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.	Yes	OCR has a full time, in-house attorney serving as advisor on EEO matters.
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.	Yes	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)]	N/A	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)]	Yes	
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)*]	Yes	

Compliance Indicator → Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments
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) and MD-715 Instructions, Sec. I.V.C]	Yes	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(E) and MD-715 Instructions, Sec. I.V.C]	Yes	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
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)]	Yes	
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)]	Yes	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	

Compliance Indicator → Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
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)]	Yes	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR § 1614.601(a)]	No	See plan Part H.2.
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes	
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)]	No	See plan Part H.5.

Compliance Indicator ⬇ Measures	E.4 (CONTINUED) – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.4.a.5	The processing of requests for reasonable accommodation? [see 29 CFR § 1614.203(d)(8)(vi); MD-715 Part B.III; and MD-715 Instructions, Sec. I.V.D]	Yes	
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 and MD-715 Instructions, Sec. I.V.D]	Yes	
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]	Yes	

Compliance Indicator ➡ ⬇ Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments
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.	Yes	GSA assesses and monitors its performance using the 156 Part G compliance measures, which are each linked to relevant EEO laws, regulations, EEOC Management Directives, Instructions, or guidance. Many measures (e.g., processing of complaints, processing of requests for reasonable accommodations, and training compliance) use empirical data which is tracked over time to assess status, trends, and progress. Independent of MD-715, GSA tracks EEO complaint data, including ADR, throughout the year, both at the agency level and for SSOs, as well as EEO-related training status and progress toward achieving required compliance.
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.	Yes	During FY 2024, GSA engaged with 49 other agencies, departments, offices, boards, services, commissions, and other groups to learn and share EEO-related best practices. Topics included barrier investigations, data analysis and reporting, complaints processing, benchmarking, Census data, the Affirmative Employment Program, MD-715, and others.
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)]	Yes	

Essential Element F: Responsiveness and Legal Compliance This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.			
Compliance Indicator **Measures**	**F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.**	**Measure Met? (Yes/No/NA)**	**Comments**
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)]	Yes	
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)]	Yes	
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F) and MD-715 Instructions, Sec. I.VI.F]	Yes	
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) and MD-715 Instructions, Sec. I.VI.F]	Yes	

Compliance Indicator → ↓ Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR § 1614.502; MD-715, II(E)]	Yes	
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)]	Yes	
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]	Yes	
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)]	Yes	
F.2.a.4	Pursuant to 29 CFR § 1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
Compliance Indicator → ↓ Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments
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)]	Yes	
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR § 1614.703(d)]	Yes	

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Plan to Attain Essential Elements

PART H.1

Part G Measure:	**C.4.e.4:** Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]
Brief Description of Program Deficiency:	Collaboration between the EEO and HR offices on barrier investigation and elimination is an ongoing priority. FY 2024 efforts resulted in elimination of one barrier. Progress was made on two additional barriers; however, further collaboration is needed to fully eliminate those two barriers and one additional barrier, and to more effectively identify further potential barriers (i.e., triggers). This Part H corrective plan addresses measure **C.4.e.4** (collaboration on identifying and removing barriers), measure **B.4.a.2** (barrier analysis resources), and measure **D.3.b** (implementation of reported barrier elimination plans)

Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
01/12/22	06/30/22	09/30/25	N/A	OCR/OHRM will collaborate regularly to identify and investigate potential barriers and develop and implement plans to systematically eliminate identified barriers.

Responsible Official(s)		
Title	Name	Plan is in Performance Standards?
Chief Human Capital Officer	Arron Helm	Yes
EEO Director	Aluanda Drain	Yes

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
03/29/24	OCR and OHRM subject matter experts (SMEs) to meet regularly to collaboratively identify triggers, conduct root cause analyses, and eliminate barriers. SMEs will provide briefings to Responsible Officials on the status and progress of barrier identification and elimination efforts, provide recommendations, obtain strategic direction, etc.	Yes	09/30/25	N/A

Report of Accomplishments	
Fiscal Year	Accomplishments
2024	Improved collaboration on the AAP for PWD eliminated the associated barrier.
2024	Progress was made toward eliminating barriers for (1) untimely processing of requests for reasonable accommodations and (2) untimely conversions of Schedule A(u) hires to the competitive service.
2024	Improvements were made regarding collection and sharing of data to be analyzed and reported (e.g., mentoring, FEVS occupational series responses, and first-line supervisor approvals of career development applications), enabling more effective trigger identification and root cause analyses.

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Plan to Attain Essential Elements

PART H.2

Part G Measure:	**B.4.a.7**: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to maintain accurate data collection and tracking systems for workforce demographics and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding.
	E.4.a.2: Does the agency have systems in place to accurately collect, monitor, and analyze the following data: The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]
	C.4.c: Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]
Brief Description of Program Deficiency:	This corrective plan addresses *employee data* shortfalls identified under Part G measures **B.4.a.7** (covering funding, staffing, and training), **E.4.a.2** (covering procedures and systems), and **C.4.c** (access to data for MD-715 tables). *Applicant flow data* shortfalls are addressed under Part H plan H.5. Separate from applicant flow data, GSA employee data is currently not entirely accurate or complete, preventing development of accurate MD-715 tables (measure **C.4.c**). Because the reasons for those shortfalls are not clear, measures **B.4.a.7** and **E.4.a.2** are both being categorized as deficient, until the root causes can be identified and addressed under this corrective plan. Key FY 2024 employee data shortfalls include accuracy and completeness of data on employee race, national origin, disability status, appointment authority, latest appointment date, temporary/permanent status, probationary dates, and excepted/competitive service categorization of Schedule A(u) appointees and converted employees.

Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
03/16/22	09/30/22	09/30/25	N/A	Attain and maintain effective systems to accurately collect, maintain, monitor, analyze, and report employee data in accordance with MD-715 requirements, with compliant outcomes enabled by adequate funding, staffing, training, procedures, and systems. Improve monitoring and maintenance of employee data to ensure critical data elements are valid and complete at the end of each fiscal year, in order to support development, analysis, and submission of mandatory annual MD-715 data tables to the EEOC via the FedSEP system.

Responsible Official(s)		
Title	**Name**	**Plan is in Performance Standards?**
EEO Director	Aluanda Drain	Yes
Chief Human Capital Officer	Arron Helm	Yes

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activity**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**
04/17/24	OCR and OHRM to collaborate to identify (1) all employee data required to support recurring annual MD-715 analysis and reporting obligations, (2) respective GSA employee data capabilities and limitations, and (3) current completeness and accuracy shortfalls, including but not limited to items listed in the deficiency description above.	Yes	09/30/25	N/A
05/08/24	OCR and OHRM to collaborate to identify and document the root cause(s) of each employee data shortfall.	Yes	09/30/25	N/A
06/05/24	OCR and OHRM to collaborate to develop, report, and begin implementation on plans to address (as soon as practicable) each root cause of each identified shortfall.	Yes	09/30/25	N/A
06/19/24	Upon completion of the activity above, OCR and OHRM to collaborate to update this Part H plan with relevant activities and target dates.	Yes	09/30/25	N/A

Report of Accomplishments	
Fiscal Year	**Accomplishments**
2024	OHRM and OCR collaborated to partially address key data inaccuracies related to race/national origin and disability status. Associated efforts to improve inaccurate disability status information for Schedule A(u) employees contributed to GSA's overall success in increasing the rate of PWD and PWTD in the workforce to record highs, prompting the GSA to further increase its participation goals, from 18% and 3%, respectively (50% higher than the 12% and 2% federal goals) to 24% and 4% (100% higher than the federal goals). As of the end of FY 2024, GSA exceeded the new goal for PWD.
2025	As of April, 2025, GSA exceeded the new goal for PWTD, due largely to a significant number of disabled veterans updating their respective Disability Status Codes.

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Plan to Attain Essential Elements		

PART H.3

Part G Measure:	**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. Dept of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dept of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries.
Brief Description of Program Deficiency:	Not all allegations of harassment received timely inquiries in FY 2024. Out of 57 harassment allegations, 54 (95%) received timely initial inquiries.

Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/23	9/30/22	9/30/25	N/A	Conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process.

Responsible Official(s)		
Title	Name	Plan is in Performance Standards?
Chief Human Capital Officer	Arron Helm	Yes
EEO Director	Aluanda Drain	Yes

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
04/19/24	Provide tailored training to EEO Counselors and Anti-Harassment Coordinators (AHC) regarding processing allegations of harassment. For EEO Counselors, emphasize the importance of timely data sharing with agency and organizational AHCs. For AHCs, emphasize the importance of initiating timely initial inquiries and timely data entry into the harassment allegation tracking system.	Yes	09/30/25	N/A

Report of Accomplishments	
Fiscal Year	Accomplishments
2024	OHRM and OCR worked collaboratively during FY 2024 and made significant progress regarding the capture, maintenance, monitoring, and sharing of data on allegations of harassment, improving the timeliness of initial inquiries from 87.5% in FY 2023 to 95% in FY 2024.

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Plan to Attain Essential Elements

PART H.4

Part G Measure:	**C.2.b.5:** Does the agency process all accommodation requests 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.
Brief Description of Program Deficiency:	In FY 2024, GSA did not process all reasonable accommodation requests within the timeframe set forth in its reasonable accommodation procedures. Out of 216 FY 2024 requests for disability-related reasonable accommodations, 197 (91%) were timely processed. Fourteen requests (6.5%) were untimely decided, three (1.4%) were untimely provided after approval, and two requests (0.9%) were untimely due to a combination of the two factors. [*The EEOC/CFR requirement is to process 100% of requests within the timeframe specified by agency procedures* (30 days, absent extenuating circumstances, and not including time required to obtain additional medical documentation). *Within that time, agencies must either (a) deny the request or (b) provide the approved accommodation*.]

Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/17/21	09/30/21	09/30/25	N/A	Timely deny or provide effective disability-related reasonable accommodations within 30 days of each request for reasonable accommodation, absent extenuating circumstances, and not including time required to obtain additional medical documentation (if required and requested).

Responsible Official(s)		
Title	Name	Plan is in Performance Standards?
Chief Human Capital Officer	Arron Helm	Yes
EEO Director	Aluanda Drain	Yes

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
04/19/24	Identify root causes for FY 2024 instances where (a) requests for disability-related reasonable accommodations were untimely denied and/or (b) approved accommodations were untimely provided. Identify parties who may have contributed to unnecessary delays (e.g., requestor, Local Reasonable Accommodation Coordinator (LRAC), Deciding Official, and/or Office of the General Counsel (OGC)). Identify resource shortfalls (if any), and develop strategies to help avoid or mitigate those issues in the future, and initiate implementation as soon as practicable.	Yes	09/30/25	N/A

| 04/26/24 | Upon completion of the first planned activity, update this Part H plan with relevant milestone activities, target dates, and a planned completion date for accomplishing the objective. | Yes | 09/30/25 | N/A |

Report of Accomplishments	
Fiscal Year	**Accomplishments**
2024	GSA continued to make progress toward reducing untimely processing of requests for disability-related reasonable accommodations, achieving a record high 91% timeliness in FY 2024 (up from 86% in FY 2023 and approximately 62% between FY 2020 and FY 2022).

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Plan to Attain Essential Elements

PART H.5

Part G Measure:	**E.4.e.4:** Does the agency have systems in place to accurately collect, monitor, and analyze external and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]
Brief Description of Program Deficiency:	This corrective plan addresses *applicant flow data* shortfalls identified under Part G measures **E.4.a.4** (covering procedures and systems), **C.4.c** (accurate and complete data), and **B.4.a.7** (covering funding, staffing, and training). *Employee* data shortfalls are addressed under Part H plan H.2. GSA applicant flow data is currently not complete; however, the reasons for those shortfalls are not clear, so measures **E.4.a.4** and **B.4.a.7** are both being categorized as deficient, until the root causes can be identified and addressed under this corrective plan. Key FY 2024 shortfalls related to applicant flow data include completeness of data on interviewed applicants; data related to selection process milestones for applications, non-selections, and selections made through direct hire authorities; data for SES selections; and applicant flow data from systems other than Monster Analytics.

Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
03/16/22	09/30/24	09/30/25	N/A	Attain and maintain effective systems to accurately collect, monitor, and analyze applicant flow data in accordance with MD-715 requirements, through sufficient funding, staffing, training, procedures, and systems. Improve consolidation and sharing of applicant flow data to ensure all data for all new hires and internal competitive promotions is complete and available at the end of each fiscal year, to support development, analysis, and submission of annual MD-715 data tables to the EEOC.

Responsible Official(s)		
Title	Name	Plan is in Performance Standards?
Chief Human Capital Officer	Arron Helm	Yes
EEO Director	Aluanda Drain	Yes

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
04/10/24	OCR and OHRM to collaborate to identify (1) all applicant flow data elements required to support recurring annual MD-715 analysis and reporting obligations, (2) respective GSA applicant flow data capabilities and limitations, and (3) current completeness/accuracy shortfalls, including but not limited to items listed in the deficiency statement.	Yes	09/30/25	N/A

05/15/24	OCR and OHRM to collaborate to identify and document the root cause(s) of each applicant flow data shortfall.	Yes	09/30/25	N/A
06/12/24	OCR and OHRM to collaborate to develop, report, and implement (as soon as practicable) plans to address each root cause of each shortfall.	Yes	09/30/25	N/A
06/26/24	Upon completion of the milestone above, OCR and OHRM to collaborate on updating this Part H corrective plan with relevant milestones, internal target dates, and a planned completion date.	Yes	09/30/25	N/A

Report of Accomplishments	
Fiscal Year	**Accomplishments**

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Plan to Attain Essential Elements

PART H.6

Part G Measure:	**E.1.a:** Does the agency timely provide EEO counseling, pursuant to 29 CFR § 1614.105?
Brief Description of Program Deficiency:	Out of 89 EEO complaints counseled in FY 2024, one EEO complaint was untimely counseled by one day.

Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/23	09/30/24	9/30/25	N/A	Timely provide all counseling.

Responsible Official(s)		
Title	**Name**	**Plan is in Performance Standards?**
EEO Director	Aluanda Drain	Yes

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
04/30/24	Identify root cause for untimely processing and develop mitigation strategy (e.g., refresher training, improve system checks).	Yes	9/30/25	N/A

Report of Accomplishments	
Fiscal Year	Accomplishments
2024	Refresher training was provided to all EEO counselors emphasizing the overall importance of timely counseling, as well as how the EEOC and EEO data systems calculate counseling times when the final counseling day ends on a Federal holiday.

Part I – EEO Plans to Eliminate Identified Barriers

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PART I.1

Plan to Eliminate Identified Barriers (Race/Ethnicity/Sex – See Part J for Barriers for PWD/PWTD)	
Source of the Trigger:	MD-715 data tables
Specific Workforce Data Table:	Table A-4
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?	██████████████████████████████
BARRIER GROUPS:	████████████
Analysis Completed?	No
Barrier(s) Identified?	No

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**
	None identified.	No barrier has yet been identified.

Objective(s) and Dates for EEO Plan to Eliminate Identified Barrier					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
N/A	N/A	N/A	N/A	N/A	No barrier has yet been identified.

Responsible Official(s)		
Title	**Name**	**Plan is in Performance Standards?**
N/A	N/A	N/A

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activity**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**
N/A	N/A	N/A	N/A	N/A

Report of Accomplishments	
Fiscal Year	**Accomplishments**
2024	A detailed analysis was undertaken in FY 2024 to expand upon prior-year efforts to investigate this topic. The FY 2024 analysis found complex interrelationships between employee demographics, grade levels, occupational series, veteran status, and performance ratings. Deeper analyses evaluated potential relationships between supervisor demographics, subordinate demographics, and subordinate performance rating outcomes. No barriers were identified; however, an additional relationship was identified between employee step ratings and performance ratings. See Part E Workforce Analysis (e.g., analyses from Figure 5 through Table 20) for descriptions of related FY 2024 investigative activities and findings. Barrier analysis of this broad topic is ongoing.

PART I.1 - Continued		
Barrier Analysis Process		
Sources of Data	**Source Reviewed?**	**Information Collected**
Workforce Data Tables	Yes	Employee and applicant data throughout the employment lifecycle, for FY 2018 through FY 2024.
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY 2018 through FY 2024.
Grievance Data	Yes	Grievance data for FY 2024.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	Yes	Anti-harassment data from FY 2024.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA FEVS results from 2022 thru 2024; OPM Government-wide Management Report – 2024 FEVS Results.
Exit Interview Data	Yes	Data on 2019-2024 exit surveys was analyzed; however, exit *interview* data is not collected.
Focus Groups	No	
Interviews	Yes	Information about workforce trends and demographic focus areas relevant to multiple individual GSA regions, offices, programs, and occupation-centric business lines.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC Report on Opportunity in the High Tech Sector and Workforce (Sep 11, 2024); EEOC Report - EEOC Research Finds Improved Asian American Representation but Underrepresentation in Federal Leadership (January 7, 2025).
Other - Career Development Program Data	Yes	Data for external Competitive Development Programs, internal details, temporary promotions, mentoring, and part-time projects in FY 2024.
Other	Yes	Census data, including occupation-specific benchmarks for GSA's 100 occupational series.
Other	Yes	FY 2024 agency-specific "stay survey" responses included in the annual FEVS.

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PART I.2

Plan to Eliminate Identified Barriers (Race/Ethnicity/Sex – See Part J for Barriers for PWD/PWTD)	
Source of the Trigger:	MD-715 data tables, applicant flow data, and career development data
Specific Workforce Data Table:	Table A-6
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?	Demographic groups have significant differences in their respective employment outcomes, spanning both desirable employment events (e.g., hires, selections, awards) and undesirable employment events (e.g., disciplinary actions, involuntary separations).
BARRIER GROUPS:	Multiple
Analysis Completed?	No
Barrier(s) Identified?	No

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**
	None identified.	No barrier has yet been identified.

Objective(s) and Dates for EEO Plan to Eliminate Identified Barrier					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
N/A	N/A	N/A	N/A	N/A	No barrier has yet been identified.

Responsible Official(s)		
Title	**Name**	**Plan is in Performance Standards?**
N/A	N/A	N/A

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activity**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**
N/A	N/A	N/A	N/A	N/A

Report of Accomplishments	
Fiscal Year	**Accomplishments**
2024	A detailed analysis was undertaken in FY 2024 to expand upon prior-year efforts on this wide-ranging situation. FY 2024 efforts analyzed eligibility/ineligibility determinations, applications, qualifications, selections, performance ratings, awards, disciplinary actions, EEO complaints, allegations of harassment, grievances, and stalled career ladders, among others. No barriers were identified; however, the analysis did recognize and confirm relationships between certain employment outcomes and other factors (e.g., occupational series, grade levels, steps). See the Part E Workforce Analysis for a summary of findings related to employment outcomes.

PART I.2 - Continued		
Barrier Analysis Process		
Sources of Data	Source Reviewed?	Information Collected
Workforce Data Tables	Yes	Employee and applicant data throughout the employment lifecycle, for FY 2018 through FY 2024.
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY 2018 thru FY 2024.
Grievance Data	Yes	Grievance data for FY 2024.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	Yes	Anti-harassment data for FY 2024.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA FEVS results from 2022 thru 2024; OPM Government-wide Management Report – 2024 FEVS Results.
Exit Interview Data	Yes	Exit *interview* data was not available to support analyses; however, data on 2019-2024 exit *surveys* was analyzed.
Focus Groups	No	
Interviews	No	Information about workforce trends and demographic focus areas relevant to multiple individual GSA regions, offices, programs, and occupation-centric business lines.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Government Accountability Office report GAO-16-520R Federal Employee Performance Ratings (May 9, 2016); EEOC Report - The Impact of Age on the Pay Gap in the Federal Sector (Jan, 2025); EEOC Report - Retaining Persons with Disabilities in the Federal Workforce (for intersectional opportunities with other demographic groups) (Sep, 2024); MSPB Report on Perceptions of Prohibited Personnel Practices (February, 2023).
Other - Career Development Program Data	Yes	Data for Competitive Development Programs from FY 2019 thru FY 2024; data on details, temporary promotions, mentoring, and part-time projects for FY 2024.
Other	Yes	Partnership for Public Service – 2023 Best Places to Work in the Federal Government® (released May, 2024).
Other	Yes	Performance rating data for recent fiscal years.
Other	Yes	Disciplinary data for recent fiscal years.
Other	Yes	Career ladder progression data for recent fiscal years.
Other	Yes	FY 2024 agency-specific "stay survey" responses included in the annual FEVS.

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 (Title 29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (Title 29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and 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)   Yes   (No)
   b. Cluster GS-11 to SES (PWD)   Yes   (No)

   Answer: GSA has no triggers in this measure.

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)   Yes   (No)
   c. Cluster GS-11 to SES (PWTD)   Yes   (No)

   Answer: GSA has no triggers in this measure.

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

   Answer: Training provided to OHRM employees highlights the GSA's agency-specific participation goals for PWD and PWTD. In addition, the training is recorded and added

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to the GSA Online University and was made mandatory for all supervisors in 2024. The training addresses efforts to improve recruitment of PWD and PWTD, awareness and use of the Schedule A(u) appointment authority, successful integration of Schedule A(u) hires into the workforce, and timely conversion of Schedule A(u) hires to the competitive service.

Section II: Model Disability Program

Pursuant to Title 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 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.

    (Yes)   No

    Answer: While several deficiencies and barriers affecting PWD and PWTD remained at the end of FY 2024, notable progress was made during the year in many associated areas and programs, due largely to re-prioritizing relevant work. Most notably:

    - Improved collaboration between OHRM and OCR on the AAP for PWD eliminated the associated barrier and four related Part G deficiencies.

    - Enhanced oversight of the Schedule A(u) program resulted in significant progress toward removing a second barrier, through systematic conversion of 42 of 44 eligible employees previously overdue for conversion from the excepted service to the competitive service. Simultaneously, improved oversight also resulted in improved conversion timeliness for more recent Schedule A(u) employees who became newly eligible in FY 2024.

    - Progress was also made on a third identified barrier affecting PWD: The timeliness of processing of requests for disability-related reasonable accommodations improved, to a record 91% timely processed in FY 2024, up from a previous record of 86% timely processed in FY 2023 and 62% in FY 2022.

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- Through efforts to improve awareness and encourage self-identification, the percentage of GSA employees with disabilities increased to a record 26.5% at the end of FY 2024, exceeding the previous record of 24.63% in FY 2023. More than 60% of GSA PWD are disabled veterans. In addition to gains in PWD, the percentage of PWTD in the GSA workforce also increased to a new record high of 3.91%, exceeding the previous record of 3.74% set in FY 2023.

- OHRM expanded the GSA Exit Survey to capture perceptions of departing employees on how the agency can improve recruitment, hiring, advancement, and retention of PWD, correcting an associated Part G deficiency.

- OHRM and OCR collaborated on development of a "disability dashboard" to capture, compile, and display aggregated real-time (non-PII) data on key metrics related to PWD, PWTD, and disabled veterans, in order to support the Affirmative Action Plan for PWD, DVAAP, and Selective Placement Program, as well as both agency and service/staff office efforts to recruit, hire, advance, and retain disabled veterans and other persons with disabilities.

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	Number of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD			1	Lee Hall Special Placement Program Coordinator lee.hall@gsa.gov
Answering questions from the public about disability hiring authorities			1	Lee Hall Special Placement Program Coordinator lee.hall@gsa.gov
Section 508 Compliance	2		21	Chuck Popelka/Daniel Perkins Section 508 Deputy/Program Manager charles.popelka@gsa.gov dan.perkins@gsa.gov
Architectural Barriers Act Compliance			12	Michael Foegelle National Accessibility Officer michael.foegelle@gsa.gov
Special Emphasis Program for PWD and PWTD	Not Applicable	Not Applicable	Not Applicable	The language in this row (and EEOC Instructions) is part of the current EEOC FedSEP MD-715 template and cannot be removed by the agency; however; the language may not be in alignment with E.O. 14173 or OPM guidance (January 21, 2025 and February 5, 2025).
Processing reasonable accommodation requests from applicants/ employees	20			Emily Claybrook Reasonable Accommodation Coordinator emily.claybrook@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.

Yes   No

Answer: All staff members with disability-related responsibilities are required to receive annual training within their respective specialties (e.g., Human Resources, Information Technology, Facilities Management); however, additional refresher training may be appropriate for participants in the reasonable accommodations process (e.g., supervisors, Local Reasonable Accommodations Coordinators, legal representatives), in order to make further improvements to processing timeliness. Additionally, in FY 2024, GSA implemented mandatory training for supervisors regarding use of the Schedule A(u) authority, both to expand awareness and use of the program and to improve integration rates of Schedule A(u) hires into the GSA workforce, as well as the timeliness of conversions of eligible Schedule A(u) employees into the competitive service.

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.

Yes   No

Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to Title 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 APPLICANTS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, specifically including persons with targeted disabilities.

Answer: In alignment with federal regulations requiring agencies to implement lawful affirmative actions to recruit and hire PWD, GSA utilized OPM's Shared Register of Candidates with Disabilities and the Department of Labor's Workforce Recruitment Program. Additionally, GSA conducted both in-person and virtual outreach to a variety of PWD-focused institutions (e.g., Rochester Institute of Technology, Gallaudet University) utilizing, where

possible, alumni of those institutions to be part of those engagements. Additionally, the agency used the USAJOBS hiring path for Individuals with Disabilities to identify positions that are open to candidates who identify as such. The application process allows the applicant to self-identify as a person who is eligible for hire under a special hiring authority and to name the special hiring authority specifically. GSA's Selective Placement Program Coordinator (SPPC) helps the agency recruit, hire, and accommodate people with disabilities and provides guidance throughout the application process and answers questions from applicants, employees, and hiring managers relating to the hiring of PWD.

2. Pursuant to Title 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(u)) to recruit PWD and PWTD for positions in the permanent workforce.

Answer:

Collectively, GSA's current employees were hired using a total of 104 different appointment authorities. Of those, there are 8 authorities that *always* take disability into account (e.g., Schedule A(u) appointments (or conversions), 30% or More Disabled Veteran appointments (or conversions), or appointment of disabled veterans from Veterans Affairs programs). Overall, 766 employees (5.7%) have been appointed by authorities that always take disability into account; however, of those, only 521 (68%) *self-identify* as having a disability.

Discounting Schedule A(u) appointments and conversions of employees who were Schedule A(u) appointees, 267 other employees have been appointed by authorities that always take disability into account; however, of those, only 76 (34%) *self-identify* as having a disability.

Additionally, there are two additional authorities (VRA and VEOA) that *may* take disability into account, but may also be used to appoint individuals *without* disabilities. With respect to the VRA and VEOA authorities, of 735 VRA and VEOA appointments, only 147 (20%) identify has having a disability; however, of the VRA and VEOA appointees who do not identify as having a disability, 260 (35%) also have either Veterans Preference Code (VPC) 04 or VPC 06, both of which, by definition, indicate a service-connected disability. Independent of appointment authorities, there are 2071 GSA employees who have VPC 04 or 06; however, only 674 self-identify in the system of record as having a disability.

The Schedule A(u) appointment authority and other hiring authorities that take disability into account are included as hiring mechanisms in job announcements; however, they are not widely used as a targeted recruitment tool. The agency's Merit Promotion announcements specifically include the USAJOBS Hiring Path for Individuals With Disabilities to identify that

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the vacancy is open to those who meet that criteria. Where applicable and when such a selection is made, the Schedule A(u) hiring authority is cited for the hire. The agency also utilizes the [Workforce Recruitment Program](#) to supplement entry-level hiring efforts. A total of 499 employees (3.7%) are Schedule A(u) or converted (former) Schedule A(u) hires.

Analysis of appointment authorities identified 104 different appointment authorities used for the FY 2024 workforce, of which 2 authorities account for 30% of employees, 4 authorities account for 50% of employees, and 17 account for 90% of the GSA workforce. Among the top appointment authorities, L1M (Schedule A(u) conversions) was ranked #12 (2.4% of employees), LZM (Conversion of 30% or More Disabled Veterans) was ranked #14 (1.6% of employees), and WUM (Schedule A(u)) was ranked #18 (1.3% of employees).

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A(u)), 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.

Answer: 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. The agency advises applicants in vacancy announcements of the documentation requirements for claiming eligibility under special hiring authorities (including Schedule A(u)). When applications are reviewed by human resources specialists, eligibility determinations are made on the basis of the supporting documentation, which may include a disability letter from a doctor or a licensed medical professional that proves their eligibility for Schedule A(u) appointment. Once eligibility is determined, the candidate is also reviewed for meeting qualification requirements. An eligible, qualified Schedule A(u) applicant is referred on the non-competitive merit promotion referral list to management, for review with other candidates.

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.

(Yes)   No   N/A

Answer: Managers and supervisors are required to take initial and recurring training courses which include topics related to hiring authorities, including Schedule A(u). All managers and supervisors were compliant with this requirement in FY 2024. Additional training was added

in FY 2024 to further educate hiring managers specifically about the Schedule A(u) authority.

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.

Answer: In alignment with laws and federal regulations directing agencies to maintain Affirmative Action Plans for PWD, the GSA National Recruitment Center maintained regularly updated lists of candidate sourcing options that included PWD-focused groups and organizations (identified by both region or occupation), as well as PWD-focused contacts within schools and universities (e.g., disability services directors, disability resource directors, and disability support offices).

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)   Yes   (No)

   b. New Hires for Permanent Workforce (PWTD)   Yes   (No)

Answer: No triggers exist in this measurement area. Permanent hires in FY 2024 were 19.48% PWD and 5.47% PWTD.

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.

   a. New Hires for MCO (PWD)   (Yes)   No

   b. New Hires for MCO (PWTD)   (Yes)   No

Answer: Among most mission-critical occupations, PWD and/or PWTD rates increase from the qualified phase to the referred phase, then drop considerably between the referral and selection phases. While that is technically a trigger, meaningful analysis of the issue is negatively impacted by extremely low rates of self-identification. With respect to application documentation related to disability status, the vast majority of applicants to GSA have historically simply left that section of their respective onboarding forms blank. In FY 2024,

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only 11% of new hire applicants and only 9% of internal competitive promotion applicants self-identified their disability status during the application process. By comparison, roughly 86% of FY 2024 applicants self-identified race/national origin and sex. Furthermore, after onboarding, PWD and PWTD rates among employees are considerably higher than the associated applicant rates. Permanent hires in FY 2024 were 19.48% PWD and 5.47% PWTD.

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.

   a. Qualified Applicants for MCO (PWD)   (Yes)   No

   b. Qualified Applicants for MCO (PWTD)   (Yes)   No

Answer: All mission-critical occupations have PWD and/or PWTD triggers related to differences between (a) rates in relevant applicant pools and (b) rates of qualified applicants; however, meaningful analyses of these issues are negatively impacted by extremely low rates of applicant disability self-identification.

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.

   a. Promotions for MCO (PWD)   (Yes)   No

   b. Promotions for MCO (PWTD)   (Yes)   No

Answer: Some mission-critical occupations have triggers related to differences between (a) relevant applicant pools and (b) applicants and/or between (c) qualified applicants and (d) selectees; however, meaningful analyses of these issues are negatively impacted by extremely low rates of self-identification. Comments in Section III.C.2 answer apply.

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.

Answer: GSA provides career development opportunities for all eligible employees (not just PWD) through external Competitive Development Programs (CDPs) and internal career development opportunities advertised through the GSA Opportunity Network, a developmental program that offers a variety of temporary opportunities to all employees, including PWD. Those opportunities include (1) part-time projects, (2) job shadowing experiences, (3) full-time details to the same grade level/unclassified duties of 120 days or less, and (4) full-time temporary promotions of 120 days or less.

In FY 2024, GSA conducted an analysis of grade level distributions within each of GSA's 100 occupational series. A preliminary distinction was made between (a) positions up to and including grade level GS13 and (b) positions at grade level GS14 and higher. Six tiers were identified, based on the percentage of series positions at GS14 and higher: (1) 0%, (2) 0.1% to 9.9%, (3) 10% to 19.9%, (4) 20% to 29.9%, (5) 30% to 49.9%, and (6) 50% or higher. A further dividing line was then identified at the 30% mark (i.e., between Tier 4 and Tier 5), as half of the GSA workforce was found to be in series with fewer than 30% of positions at GS14 and higher and half of the GSA workforce was found to be in occupations that go no further than GS13. An initial focus was on the 41 occupations that have zero positions at GS14 or higher (and which account for 5% of the workforce).

Subsequent comparisons of group rates in the overall GSA and group rates in Tier 1, Tiers 2-4, and Tiers 5-6 determined that the lowest rates of PWD and PWTD are in Tiers 5-6 (those with the highest percentage of positions in high grade levels) and the highest rates of PWD and PWTD are in Tier 1 (series that have *zero* positions above GS13).

In FY 2025, GSA plans to conduct deeper root cause analysis into the series and grade level distributions of PWD and PWTD. Preliminary analyses suggest at least a partial correlation between self-identification and grade level, and also found low self-identification rates within particular occupations (i.e., low PWD and PWTD rates in high grades may be due, in part, to low *self-identification*, rather than a lack of PWD or discrimination against PWD). Future root cause analyses are planned to further investigate the reasons for low self-identification rates among employees in high grade levels and certain occupations.

B. <u>CAREER DEVELOPMENT OPPORTUNITIES</u>

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

<u>Answer</u>: GSA provides career development opportunities for all eligible employees (not just PWD) through both external and internal programs. CDPs are agency-wide offerings that provide leadership development opportunities via recognized *external* programs that focus on leadership competencies required for current and future leaders, and internal programs include both agency-wide opportunities (such as details, temporary promotions, and part-time projects advertised through the GSA Opportunity Network), as well as programs unique to particular offices, programs, or business lines.

Specific CDPs vary from year to year. The FY 2024 CDPs included 9 grade-specific courses from 6 major sources, including (1) eCornell (two leadership courses), (2) Graduate School USA (Executive Leadership Program and Executive Potential Program), (3) Partnership for Public Service (Excellence in Government Fellows Program and Leadership Excellence in Acquisition Program), (4) Harvard Kennedy School (Leadership Decision-Making Online Program), (5) Center for Creative Leadership (Maximizing Your Leadership Potential), and (6) American University (New Supervisor Leadership Development Program). The programs each have different eligibility criteria, focus areas, and develop different competencies, up to and including Senior Executive Service candidate development.

Internal GSA offerings included the (1) GSA Start Program, (2) Targeted Leadership Development Program, (3) Mentoring Programs, (4) Coaching services, and (5) Enterprise Emerging Leaders Program, as well as opportunities advertised through the GSA Opportunity Network for (1) part-time projects, (2) job shadowing experiences, (3) full-time details to the same grade level/unclassified duties of 120 days or less, and (4) full-time temporary promotions of 120 days or less.

GSA's Mentoring Program and various sub-component mentoring programs establish 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) contain a requirement for a phased retiree to spend at least 20 percent of his/her working hours mentoring (e.g., succession planning, knowledge transfer, training).

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 EELP 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), (3) Leading Organizations - Manager (GS14-GS15), (4) 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	252	28	29.37	28.57	4.76	3.57
Training Programs	324	112	31.48	22.32	4.94	2.68
Internship Programs	6677	188	6.78	5.32	3.94	2.66
Fellowship Programs	15	0	0.00	0.00	0.00	0.00
Mentoring Programs	29	28	34.48	32.14	3.45	3.57
Coaching Programs	Coaching does not require competition or supervisor approval.					
Detail Programs	395	227	28.10	25.99	4.30	3.08

3. Do triggers exist for <u>PWD</u> 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.

a. Applicants (PWD)	(Yes)	No
b. Selections (PWD)	(Yes)	No

<u>Answer</u>: PWD have higher participation rates among applicants than selectees for all career development programs. Furthermore, the selection rates for FY 2024 were lower for all categories of career development opportunities, except for details.

4. Do triggers exist for <u>PWTD</u> among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWTD)	(Yes)	No
b. Selections (PWTD)	(Yes)	No

<u>Answer</u>: PWTD have higher participation rates among applicants than selectees for all analyzed career development programs, except for mentoring programs.

C. <u>AWARDS</u>

1. Using specified benchmarks, 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)	(Yes)	No
b. Awards, Bonuses, & Incentives (PWTD)	(Yes)	No

<u>Answer</u>: Yes; there are triggers for PWD and/or PWTD in time-off awards between 11 hours and 40 hours. With respect to cash awards, there are triggers for PWD and/or PWTD in the $500-$999 category and all categories $2000 and higher.

2. Using specified benchmarks, 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)   (Yes)   No

    b. Pay Increases (PWTD)   (Yes)   No

Answer: Both PWD and PWTD received Quality Step Increases (QSI) at a lower rate than persons without disabilities. Additionally, PWD have a trigger for performance-based awards.

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.[126]) If "yes", describe the employee recognition program and relevant data in the text box.

    a. Other Types of Recognition (PWD)   Yes   No   (N/A)

    b. Other Types of Recognition (PWTD)   Yes   No   (N/A)

Answer: Data on other types of recognition is not currently available.

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.

    a. SES

        i. Qualified Internal Applicants (PWD)   (Yes)   No

        ii. Internal Selections (PWD)   (Yes)   No

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[126] "Inclusion rate" is a term introduced into the MD-715 template in 2017 as a measurement of comparison to assess differences in employment outcomes between PWD/PWTD and individuals *without* disabilities. *See* EEOC Instructions, Section II.II.A. In its intended context, the term does not conflict with Executive Order 14173 or associated OPM initial guidance or further guidance on E.O. 14173.

   b. GS-15

      i.   Qualified Internal Applicants (PWD)   (Yes)   No

      ii. Internal Selections (PWD)   (Yes)   No

   c. GS-14

      i.   Qualified Internal Applicants (PWD)   (Yes)   No

      ii. Internal Selections (PWD)   (Yes)   No

   d. GS-13

      i.   Qualified Internal Applicants (PWD)   (Yes)   No

      ii. Internal Selections (PWD)   (Yes)   No

<u>Answer</u>: For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in the Section III.C.2 answer apply.

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.

   a. SES

      i.   Qualified Internal Applicants (PWTD)   (Yes)   No

      ii. Internal Selections (PWTD)   (Yes)   No

   b. GS-15

      i.   Qualified Internal Applicants (PWTD)   Yes   (No)

      ii. Internal Selections (PWTD)   Yes   (No)

   c. GS-14

      i.   Qualified Internal Applicants (PWTD)   Yes   (No)

      ii. Internal Selections (PWTD)   (Yes)   No

   d. GS-13

      i.   Qualified Internal Applicants (PWTD)   (Yes)   No

      ii. Internal Selections (PWTD)   (Yes)   No

Answer: For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in the Section III.C.2 answer apply.

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.

a.	New Hires to SES (PWD)	(Yes)	No
b.	New Hires to GS-15 (PWD)	(Yes)	No
c.	New Hires to GS-14 (PWD)	(Yes)	No
d.	New Hires to GS-13 (PWD)	(Yes)	No

Answer: For SES, there was no data available relating to new hires. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in the Section III.C.2 answer apply.

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.

a.	New Hires to SES (PWTD)	(Yes)	No
b.	New Hires to GS-15 (PWTD)	(Yes)	No
c.	New Hires to GS-14 (PWTD)	(Yes)	No
d.	New Hires to GS-13 (PWTD)	(Yes)	No

Answer: For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in Section III.C.2 answer apply.

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.

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a. Executives

    i. Qualified Internal Applicants (PWD)   (Yes)   No

    ii. Internal Selections (PWD)   (Yes)   No

b. Managers

    i. Qualified Internal Applicants (PWD)   (Yes)   No

    ii. Internal Selections (PWD)   (Yes)   No

c. Supervisors

    i. Qualified Internal Applicants (PWD)   (Yes)   No

    ii. Internal Selections (PWD)   (Yes)   No

<u>Answer</u>: For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in the Section III.C.2 answer apply.

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)   (Yes)   No

    ii. Internal Selections (PWTD)   (Yes)   No

b. Managers

    i. Qualified Internal Applicants (PWTD)   (Yes)   No

    ii. Internal Selections (PWTD)   (Yes)   No

c. Supervisors

    i. Qualified Internal Applicants (PWTD)   Yes   (No)

    ii. Internal Selections (PWTD)   (Yes)   No

Answer: For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in Section III.C.2 answer apply.

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

    a. New Hires to Executives (PWD)   (Yes)   No
    b. New Hires to Managers (PWD)   (Yes)   No
    c. New Hires to Supervisors (PWD)   (Yes)   No

Answer: For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in Section III.C.2 answer apply.

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

    a. New Hires to Executives (PWTD)   (Yes)   No
    b. New Hires to Managers (PWTD)   (Yes)   No
    c. New Hires to Supervisors (PWTD)   (Yes)   No

Answer: For SES, there was no data available relating to internal selections. Trigger identification in this area is negatively impacted by a very low rate of applicant self-identification of disability status. Comments in Section III.C.2 answer apply.

Section V: Plan to Improve Retention of Persons with Disabilities

To be a 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(u) 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(u) employees.

                                                             Yes   (No)

    Answer: GSA made significant progress in FY 2024 toward converting eligible Schedule A(u) employees from the excepted service into the competitive service. Systematic analysis and collaboration between OCR and OHRM validated dates of employee onboardings, position transitions, and probationary periods, as well as data on appointment authorities, disability status codes, permanent/temporary status, and excepted/competitive service status. Improvements in program oversight following implementation of new Schedule A(u) procedures in FY 2023 resulted in conversion of 42 of 44 eligible Schedule A(u) employees previously identified as overdue for conversion from the excepted service to the competitive service. Simultaneously, the improved oversight also resulted in increased conversion timeliness for more recent Schedule (A)u employees who became newly eligible in FY 2024; however, not all employees who ended probation in FY 2024 were timely converted.

2. Using specified benchmarks, 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)   Yes   (No)
    b. Involuntary Separations (PWD)   (Yes)   No

    Answer: The percentage of PWD among removals exceeded those of persons without disabilities.

3. Using specified benchmarks, 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)   (Yes)   No
     b. Involuntary Separations (PWTD)   (Yes)   No

     Answer: In all types of separations, the percentages of PWTD exceeded those of persons without disabilities.

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.

     Answer:

     Follow-up analysis was conducted in FY 2023 and FY 2024 into 6 years of exit survey data to analyze terminations of probationary Schedule A(u) employees, with the intention of investigating whether the terminations were potentially related to barriers (such as untimely processing of reasonable accommodations, potentially leading to performance or other follow-on issues); however, none were found to be associated with discriminatory barriers.

     GSA resolved a Part G deficiency in FY 2024 by adding a question to the GSA Exit Survey on how the agency can improve recruitment, hiring, advancement, and retention of persons with disabilities. In general, most respondents to that question appear to be persons *without* disabilities, rather than PWD providing first-person perspectives. The majority of responses related to generic employment concerns (e.g., training, speedier hiring actions, the selection process, increased pay), while some responses focused on specific personal considerations unrelated to disability status. Many of the responses identified *favorable* perceptions of how GSA is addressing employment of PWD.

     Some recommendations included:

     - Improving availability of sign language services;
     - Having announcements specific to PWD only;
     - Greater availability of remote positions;
     - Increasing staffing levels; and
     - Improve efforts to recruit, hire, and retain veterans.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to Title 29 C.F.R. § 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), 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.

Answer: Information on rights associated with Section 508 of the Rehabilitation Act, including processes to file a Section 508 complaint, is at https://www.gsa.gov/website-information/accessibility-statement. Information on how to file a Section 508 complaint is also available to employees only via the internal GSA-only website: https://insite.gsa.gov/employee-resources/information-technology/it-accessibility-section-508/file-a-508-complaint?term=508+complaint. Additionally, applicants can access information about available Section 508 complaint processes by clicking the Accessibility Statement located at the bottom of the GSA homepage at www.gsa.gov.

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.

Answer: Information on rights associated with the Architectural Barriers Act (ABA) is on the site: https://www.gsa.gov/real-estate/design-and-construction/accessible-facility-design. That site includes a link to the GSA Accessibility Desk Guide, which includes information on how to file ABA complaints through the U.S. Access Board.

2. 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.

Answer: GSA is committed to making Federal buildings and facilities fully accessible to all people, and achieving accessibility is reflected in GSA's commitment to excellence in design, development, and construction. GSA is dedicated to meeting or exceeding Federal, state, and local accessibility standards and to ensuring the full integration of individuals

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with disabilities who use our facilities. Because GSA's facilities are flexible and adaptable, providing employees and visitors with disabilities the opportunity to take part in all the programs, services, and activities our buildings are designed to support is an attainable goal. GSA is also addressing physical accessibility by aligning with the National Accessibility Program.

C.   REASONABLE ACCOMMODATION PROGRAM

Pursuant to Title 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.

Answer: The average time to process requests (i.e., to either deny requests for reasonable accommodation or provide the approved accommodations) was 22.4 days.

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.

Answer: Further improvements were made to the reasonable accommodations program during FY 2024, expanding on FY 2023 efforts and making notable progress toward resolving both the Part G deficiency and associated Part J barrier related to untimely processing of disability-related accommodation requests. In FY 2024, the GSA achieved a record overall processing timeliness rate of 91% (up from 86% timely in FY 2023 and 62% in FY 2022). While showing improvement, the EEOC timeliness standard is 100% (absent extenuating circumstances), and as such, those requests that are untimely processed remain an employment barrier for PWD. In FY 2024, 100% of eligible onboard supervisors and managers received training on reasonable accommodations as part of biennial No FEAR Act training.

In addition to processing and training outcomes, a notable best practice is tracking of contributing factors, including responsible parties (e.g., requestors, deciding officials, reasonable accommodation coordinators, general counsel), for all requests that take longer than the 30 days specified in GSA's policy for providing reasonable accommodation.

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 lawful 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.

Answer: GSA had no requests for personal assistance services in FY 2024. PAS are addressed in GSA's reasonable accommodations procedures and related training.

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?

   (Yes)   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?

   Yes   (No)

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.

Answer: In FY 2024, EEOC calculated the government-wide average for formal complaints filed by PWD alleging disability harassment as 28.93%. Among formal and mixed cases, 10 of 18 closed cases and 19 of 47 open cases were filed by persons with disabilities. Of those cases filed by PWD, 6 of 10 closed cases (60%) and 7 of 19 open cases (37%) alleged disability-related discrimination. None resulted in a finding.

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, vs. the government-wide average?

   Yes   (No)

2. During the last fiscal year, did any complaints alleging failure to provide a reasonable accommodation result in a finding of discrimination or a settlement agreement?

   (Yes)   No

3. If the agency had one or more findings of discrimination involving failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Answer: In FY 2024, EEOC calculated the government-wide average for formal complaints filed by PWD alleging failure to accommodate as 20.33%. Among formal and mixed cases, 10 of 18 closed cases and 19 of 47 open cases were filed by persons with disabilities. Of those cases filed by PWD, 3 of 10 closed cases (30%) and 7 of 19 open cases (37%) alleged failure to accommodate.

One complaint alleging failure to provide a reasonable accommodation resulted in a finding. Corrective measures included non-pecuniary damages of $10,000, and the Agency is required to ensure that the complainant has closed-captioning or Communication Access Realtime Translation (CART) when necessary. Additionally, the responsible management officials were required to take training, and the agency was required to post an associated Notice to Employees.

In addition to the finding, there was one allegation of failure to accommodate that resulted in a settlement agreement. In that case, the agency agreed to meet with the Job Accommodation Network (JAN) to explore options for an appropriate reasonable accommodation.

Section VII: Identification and Removal of Barriers

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

<div align="center">Yes   (No)</div>

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

<div align="center">Yes   (No)</div>

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.

GSA <u>previously</u> identified four barriers related to persons with disabilities:

1. Untimely processing of requests for disability-related reasonable accommodations;

2. Untimely conversion of employees hired under the Schedule A(u) appointment authority;

3. Employees in non-permanent positions for extended durations;

4. Insufficient collaboration on implementation of the Affirmative Action Plan for PWD.

Of those four barriers, notable progress was made on the first two in FY 2024 and progress was made on the third barrier during early FY 2025, after the end of the FY 2024 reporting period, but prior to the submission of the FY 2024 report. The fourth barrier was eliminated altogether.

Barrier elimination plans for the three remaining barriers follow, using the same barrier elimination plan templates as those found in Part I of this report, which document triggers, barriers, and affected demographic groups, as well as agency plans, objectives, target dates, completion dates, responsible officials, and accomplishments. The barrier elimination plans in Part I address triggers and barriers related to race/national origin and/or sex, and the Part J plans that follow address barriers related to disability status.

EEOC FORM 715-02 PART J	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
General Services Administration	**For period covering October 1, 2023 to September 30, 2024**

Plan to Eliminate Barriers Affecting PWD/PWTD

PART J.1

Barrier Title:	**Untimely Reasonable Accommodations**
Affected Group(s):	Persons with Disabilities Persons with Targeted Disabilities
Statement of Identified Barrier:	Untimely processing of reasonable accommodations from FY 2020 thru FY 2024 is an ongoing barrier affecting PWD and PWTD. The 29 CFR § 1614.203(d)(3)(i) requirement is for agencies to process 100% of requests within the timeframe specified by agency procedures (30 days, absent extenuating circumstances, and not including time required to obtain additional medical documentation). Within that time, agencies must either (a) deny the request or (b) provide the approved accommodation. Out of 216 FY 2024 requests for disability-related reasonable accommodations, 197 (91%) were timely processed. Fourteen requests (6.5%) were untimely decided and three (1.4%) were untimely provided after approval, and two requests (0.9%) were untimely due to a combination of those two factors.

Objective(s) and Dates for EEO Plan to Eliminate Barriers Affecting PWD/PWTD				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/17/21	09/30/21	09/30/25	N/A	Timely deny or provide effective disability-related reasonable accommodations within 30 days of each request for reasonable accommodation, absent extenuating circumstances, and not including time required to obtain additional medical documentation (if required and requested).

Responsible Official(s)		
Title	Name	Plan is in Performance Standards?
Chief Human Capital Officer	Arron Helm	Yes
EEO Director	Aluanda Drain	Yes

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
04/19/24	Identify root causes for instances where requests for disability-related reasonable accommodations were (a) untimely denied and/or (b) accommodations were untimely provided. Identify all involved parties who may have contributed to unnecessary delays (e.g., requestor, LRAC, Deciding Official, or OGC), identify resource shortfalls, develop strategies (e.g., training) to help avoid or mitigate those issues in the future, and initiate implementation as soon as practicable.	Yes	09/30/25	N/A
04/26/24	Update this Part H plan with relevant milestone activities, target dates, and a planned completion date for accomplishing the objective.	Yes	09/30/25	N/A

Report of Accomplishments	
Fiscal Year	Accomplishments
2024	GSA continued to make progress toward eliminating untimely processing of requests for disability-related reasonable accommodations, achieving a record 91% timeliness rate in FY 2024 (up from 86% in FY 2023 and 62% in FY 2022).

EEOC FORM 715-02 PART J	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
General Services Administration	**For period covering October 1, 2023 to September 30, 2024**

Plan to Eliminate Barriers Affecting PWD/PWTD

PART J.2

Barrier Title:	**Untimely Schedule A(u) Conversions**
Affected Group(s):	Persons with Disabilities Persons with Targeted Disabilities
Statement of Identified Barrier:	Untimely conversions of eligible employees appointed under the Schedule A(u) hiring authority for individuals with intellectual disabilities, severe physical disabilities, or psychiatric disabilities creates an employment barrier for PWD and PWTD. At the beginning of FY 2024, 44 eligible employees were overdue for conversion. At the end of FY 2024, 2 of those 44 remained overdue for conversion (in addition to 6 more recent Schedule A(u) hires who ended their respective probation periods during FY 2024, but were not timely converted). Employees appointed under the Schedule A(u) appointment authority (5 CFR § 213.3102(u)) are appointed to the *Excepted Service* (without regard to temporary or permanent status). As codified in 5 CFR § 315.709, an agency *may* non-competitively convert to the *Competitive Service* an employee who has completed 2 years of satisfactory service in accordance with the provisions of EO 12125, as amended by EO 13124 (unless the employee is in a temporary appointment *because the work is of a temporary nature* (and not because the temporary appointment was necessary to observe the applicant on the job to determine whether the applicant is able or ready to perform the duties of the position)).

Objective(s) and Dates for EEO Plan to Eliminate Barriers Affecting PWD/PWTD				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/17/21	09/30/21	09/30/25	N/A	Timely convert all eligible Schedule A(u) employees from excepted to competitive service, or provide narrative reasons for not converting all eligible Schedule A(u) employees, for inclusion in Part J of the MD-715 report.

Responsible Official(s)		
Title	Name	Plan is in Performance Standards?
Chief Human Capital Officer	Arron Helm	Yes
EEO Director	Aluanda Drain	Yes

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
09/29/23	Develop and implement policy and procedures to (1) timely convert eligible Schedule A(u) employees from the excepted to the competitive service and/or (2) to timely provide narrative reasons (for inclusion in Part J of the MD-715 report) for *not* converting all eligible Schedule A(u) employees, if any.	Yes	09/30/25	N/A

04/26/24	Upon completion of the first planned activity, update this Part H plan with relevant milestone activities, target dates, and a planned completion date for accomplishing the objective.	Yes	09/30/25	N/A

Report of Accomplishments	
Fiscal Year	**Accomplishments**
2024	GSA reduced 95% of the previous backlog of conversions of overdue eligible Schedule A(u) hires.
2024	GSA analyzed all relevant data for Schedule A(u) hires and validated all dates of employee onboardings, position transitions, and probationary periods, as well as the accuracy of data on appointment authorities, disability status codes, permanent/temporary status, and excepted/competitive service status, and implemented corrections to address all identified issues.
2025	As of February 2025, considerably progress was made by GSA in addressing not only Schedule A(u) conversions, but also associated data. OHRM and OCR collaborated to identify critical conversion and employee data issues and OHRM made significant progress toward improving the accuracy of Appointment Authority Codes, Position Occupied Descriptions, Type of Appointment Codes, and Probation Start and End dates for current (excepted service) and former (competitive service) Schedule A(u) appointees.
2025	Efforts to address Schedule A(u) conversions and data also had helped GSA make progress on the barrier related to employees in non-permanent status for extended durations.

EEOC FORM 715-02 PART J	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
General Services Administration	**For period covering October 1, 2023 to September 30, 2024**	

Plan to Eliminate Barriers Affecting PWD/PWTD		
PART J.3		

Barrier Title:	**Employees in Temporary Status for Extended Durations**
Affected Group(s):	Persons with Disabilities Persons with Targeted Disabilities
Statement of Identified Barrier:	At the end of FY 2024, 43 employees were found to be categorized in the employee data system of record as being in non-permanent status for at least the last 5 consecutive years. A disproportionate number of those non-permanent employees are Schedule A(u) or other PWD.

Objective(s) and Dates for EEO Plan to Eliminate Barriers Affecting PWD/PWTD				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/30/23	09/29/23	09/30/25	N/A	(1) Ensure that the non-permanent/permanent status indicators for all employees are correct. (2) Ensure that all employees do not remain in non-permanent positions in excess of approved durations. (3) Ensure that excepted service Schedule A(u) hires who are in temporary status under 5 CFR § 213.3102(u)(5)(i) *(i.e., because the agency determined that it was necessary to observe the applicant on the job to determine whether the applicant is able or ready to perform the duties of the position)* are converted to permanent status in the excepted service as soon as practicable after the agency determines the individual is able to perform the duties of the position.

Responsible Official(s)		
Title	Name	Plan is in Performance Standards?
Chief Human Capital Officer	Arron Helm	Yes
EEO Director	Aluanda Drain	Yes

Planned Activities Toward Completion of Objective				
Target Date	Planned Activity	Sufficient Funding / Staffing?	Date Modified	Date Completed
04/17/24	OCR and OHRM to meet to analyze current employee data for employees currently in non-permanent status in HRLinks to identify (1) potential accuracy issues with temporary/permanent status data elements in HRLinks and (2) employees who appear to be in temporary status beyond the expected timeframes of their respective appointment authorities.	Yes	09/30/25	N/A
06/12/24	OCR and OHRM to meet to identify whether non-permanent employees in authorities WTA, WTB, WTM, and WUM are in non-permanent status, and if so, if they are in that status because (a) the nature of work is temporary (in accordance with 5 CFR § 213.3102(u)(5)(ii)) and/or (b) the agency determined that it was necessary, to first observe the applicant on the job to determine whether the applicant is able or ready to perform the duties of the position (per 5 CFR § 213.3102(u)(5)(i)).	Yes	09/30/25	N/A

09/30/25	For all employees in the latter category, determine if they are now eligible for conversion to *permanent* status in the Excepted service (i.e., separate from their potential conversion from the Excepted service to the Competitive service). Note that 5 CFR § 315.709 allows for conversion from the excepted service to the competitive service, but only after two or more years of satisfactory service under a *non-temporary* appointment.	Yes	N/A	N/A

Report of Accomplishments	
Fiscal Year	**Accomplishments**
2024	Two deeper analyses were undertaken to address shortfalls in key data reports that prevent identification of accurate employee permanent/temporary status. In the first analysis, a 5-year history was developed, showing annual snapshots of key data, so that changes from year-to-year could be identified, independent of other data fields. A second analysis consolidated data from two separate reports to further identify changes in Latest Appointment Date. Collectively, those analyses enabled GSA to identify changes in employee assignments, so that a distinction can be made between employees in extended non-permanent status in one position and employees who have been in non-permanent status in several consecutive positions of shorter duration.
2025	As of February 2025, OHRM made significant improvements to Appointment Authority Codes, Position Occupied Descriptions, Type of Appointment Codes, and Probation Start and End dates, resulting not only in progress on the Schedule A(u) conversion barrier, but also on the barrier related to employees in non-permanent status for extended durations.

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

Answer:

Noteworthy progress continued on efforts to resolve two barriers (untimely processing of reasonable accommodations (Plan J.1) and conversions of Schedule A(u) employees (Plan J.2)); however, neither barrier was fully eliminated, according to the reported plan. Reasonable accommodations achieved a 91% timely processing rate in FY 2024 (an agency record), up from 86% in FY 2023 and 62% in FY 2022. Schedule A(u) conversion timeliness also improved, most notably through a 95% reduction in the pre-FY 2024 backlog of unconverted eligible employees.[127] Progress on those two barriers continued into FY 2025 (after FY 2024 ended, but before the FY 2024 report was submitted).

FY 2024 progress on a third identified barrier (employees in non-permanent status for extended durations (Plan J.3)) was slower than originally planned; however, FY 2025 efforts to address the Schedule A(u) conversions barrier also directly improved progress on the barrier relating to non-permanent status.

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

Answer: One FY 2023 barrier related to implementation of the AAP for PWD was resolved in FY 2024. Further progress on reasonable accommodations timeliness is anticipated in FY 2025, and the barriers related to Schedule A(u) conversions and non-permanent employees are likely to be resolved entirely in FY 2025.

The progress on those barriers is quantifiable (e.g., a 95% reduction in overdue Schedule A(u) conversions and 91% timely processing of requests for reasonable accommodations).

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.

Answer: The corrective plans are appropriate and the associated programs are being effectively managed. All plans are active and will be modified, as necessary, to address new findings, if any, until full compliance can be achieved and sustained.

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[127] The barrier related to untimely processing of requests for reasonable accommodations also creates a reportable Part G deficiency. Note that the EEOC compliance threshold for timely processing is 100%, so while the agency achieved 91% timeliness in FY 2024, it is still reportable as a Part G deficiency.

June 2, 2025

MEMORANDUM FOR ALL GSA EMPLOYEES

FROM: STEPHEN EHIKIAN *Stephen Ehikian*
             ACTING ADMINISTRATOR (A)

SUBJECT: Annual Agency Equal Employment Opportunity (EEO) Policy
             Statement

GSA strives to attract, develop, and retain the best employees from across the nation, and to provide an environment in which all are able to contribute to their full potential.

We are committed to ensuring that all GSA employees and applicants for GSA employment have the freedom to compete on a fair and level playing field, with equal opportunity for competition, free from discrimination or harassment based on any protected basis, in accordance with relevant Federal laws.

GSA does not tolerate unlawful discrimination or harassment based on race, color, religion, sex, national origin, age, disability, genetic information, or reprisal for protected EEO activity. EEO protections pertain to all GSA personnel and employment programs, as well as to management practices and decisions, including recruitment, hiring, career development, promotions, transfers, reassignments, training, benefits, and separations.

GSA supports employees in exercising their rights under civil rights statutes, and will not permit reprisal against anyone who engages in protected EEO activity.

At GSA, we are committed to resolving workplace conflict in a timely, impartial, and constructive manner. We will address harassing conduct before it becomes severe or pervasive. Employees found to have violated any Federal laws or GSA policies related to discrimination, including harassment, may be subject to disciplinary action, up to and including removal.

Employees or applicants who believe they have been subjected to unlawful discrimination and wish to initiate an EEO complaint may contact GSA's Office of Civil Rights at eeo@gsa.gov or (202) 501-4571. Additional information is on GSA InSite.

Employees who believe they have been subject to, or have been a witness to, harassment must report the matter to their first-line supervisor, another management official in their supervisory chain, or an Anti-Harassment Coordinator.

Please join me in reaffirming our shared responsibility to maintain a workplace that values merit, respects individual contributions, and protects equal opportunity.

Figures and Tables

Acronyms

2F .... Two or More Races Female
2M .... Two or More Races Male
AAP .... Affirmative Action Plan
ABA .... Architectural Barriers Act
ACS .... American Community Survey
ADR .... Alternative Dispute Resolution
AEP .... Affirmative Employment Program
AEPM .... Affirmative Employment Program Manager
AF .... Asian Female
AFD .... Applicant Flow Data
AIAN .... American Indian or Alaska Native
AH .... Anti-Harassment
AHC .... Anti-Harassment Coordinator
AM .... Asian Male
ANSI .... American National Standards Institute
BF .... Black or African American Female
BM .... Black or African American Male
CA .... Contract Appeals Pay Plan Code
CART .... Communication Access Realtime Translation
CDP .... Competitive Development Program
C.F.R. .... Code of Federal Regulations
CLF .... Civilian Labor Force
DVAAP .... Disabled Veterans Affirmative Action Program
ECQ .... Executive Core Qualifications
EELP .... Enterprise Emerging Leaders Program
EEO .... Equal Employment Opportunity
EEOC .... Equal Employment Opportunity Commission
EF .... Consultant Pay Plan Code
ES .... Senior Executive Service Pay Plan Code
EX .... Executive Schedule Pay Plan Code
FEDSEP .... Federal Sector EEO Portal
FEVS .... Federal Employee Viewpoint Survey
FIPS .... Federal Information Processing Standard
FY .... Fiscal Year
GAO .... Government Accountability Office
GS .... General Schedule Pay Plan Code
GSA .... U.S. General Services Administration
HF .... Hispanic or Latino Female
HM .... Hispanic or Latino Male

HR	Human Resources
HRM	Human Resources Manual
IF	American Indian or Alaska Native (AIAN) Female
IM	American Indian or Alaska Native (AIAN) Male
IT	Information Technology
JAN	Job Accommodation Network
LRAC	Local Reasonable Accommodations Coordinator
MCO	Mission-Critical Occupation
MD-715	Management Directive 715
MSPB	Merit Systems Protection Board
MSPR	Merit Systems Protection Reporter
NCLF	National Civilian Labor Force
NF	Native Hawaiian or Pacific Islander (NHOPI) Female
NHOPI	Native Hawaiian or Pacific Islander
NM	Native Hawaiian or Pacific Islander (NHOPI) Male
No FEAR Act	Notification and Federal Employee Antidiscrimination and Retaliation Act
OCR	Office of Civil Rights
OGC	Office of the General Counsel
OHRM	Office of Human Resources Management
OMB	Office of Management and Budget
OPM	Office of Personnel Management
PAS	Personal Assistance Services
PII	Personally Identifiable Information
PWD	Persons with Disabilities
PWTD	Persons with Targeted Disabilities
QSI	Quality Step Increase
SES	Senior Executive Service
SF	Standard Form
SL	Senior Level Pay Plan Code
SPP	Selective Placement Program
SPPC	Selective Placement Program Coordinator
SSO	Services and Staff Offices
ST	Scientific and Professional Pay Plan Code
U.S.C.	United States Code
VA	[U.S. Department of] Veterans Affairs
VEOA	Veterans Employment Opportunity Act of 1998
VPC	Veterans Preference Code
VRA	Veterans' Recruitment Appointment
WG	Wage Grade Pay Plan Code
WL	Wage Leader Pay Plan Code
WS	Wage Supervisor Pay Plan Code