



Equal Employment Opportunity Program Status Report for Fiscal Year 2023



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EEOC MD-715 Overview

This Equal Employment Opportunity (EEO) Program Status Report for fiscal year 2023 (FY23) is prepared and submitted in accordance with Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715), EEOC's accompanying *Instructions to Federal Agencies for EEO MD-715*,¹ and related EEOC guidance. Per MD-715, "The overriding objective of this directive is to ensure that all employees and applicants for employment enjoy equality of opportunity in the federal workplace regardless of race, sex², national origin, color, religion, disability, or reprisal for engaging in prior protected activity." Consistent with this objective, MD-715 requires the U.S. General Services Administration (GSA) to:

- Conduct a comprehensive assessment of GSA's compliance with 156 measures in Part G of the report, on at least an annual basis, to evaluate compliance with key EEO laws, regulations, and other directives, using EEOC's prescribed measures and standards.
- If any compliance deficiencies are identified, MD-715 requires GSA to designate responsible officials to oversee development and implementation of relevant corrective plans to systematically resolve each identified deficiency (Part H of the report).
- Proactively and methodically identify any institutional, attitudinal, and/or physical barriers that may operate to exclude certain protected groups, and to develop and execute strategic plans to eliminate any identified barriers (Parts I and J of the report).
- Develop and implement a "Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities" (known as the Affirmative Action Plan for Persons with Disabilities (PWD)) (also in Part J of the report).

This EEO Program Status Report (MD-715 report) reflects the results of GSA's efforts throughout FY23. The structure, format, and content of this report are prescribed by the EEOC, including Parts A thru J, data tables A-1 thru B-9, and all supplemental documents (e.g., reasonable accommodations procedures, organizational chart, and EEO policy statement).

¹ See EEOC MD-715 (Oct. 1, 2003) at <https://www.eeoc.gov/federal-sector/management-directive/section-717-title-vii> and *Instructions to Federal Agencies for EEO MD-715* at <https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eeo-md-715>. Per EEOC's federal-sector regulations at 29 C.F.R. § Part 1614, MD-715 is binding on all Executive agencies (including GSA). See 29 C.F.R. § 1614.103(b)(2) ("This part applies to . . . Executive agencies as defined in 5 U.S.C. 105"); see also 29 C.F.R. § 1614.102(e) ("Agency programs *shall* comply with this part and the Management Directives and Bulletins that the Commission issues.") (emphasis added).

² EEOC MD-715 and EEOC Instructions on MD-715 use the terms "sex" and "gender" interchangeably.

MD-715 Report Overview

This report is a comprehensive assessment of GSA's regulatory compliance and progress on mandatory activities, including correction of previously identified deficiencies, execution of root cause analyses (barrier investigations), and execution of affirmative actions to improve recruitment, hiring, advancement, and retention of persons with disabilities. Reporting requirements (including structure, format, and content) are dictated by the EEOC's *Instructions to Federal Agencies* and Federal Sector EEO Portal reporting interface. This report provides a snapshot of the status and progress of relevant activities as of September 30, 2023.

Parts A through D of the report include basic information about the agency and its programs.

Part E of the report is an executive summary that includes a workforce analyses, findings, annual accomplishments, and future plans.

Part G assesses compliance with 156 regulatory requirements, in which GSA reported 31 deficiencies in FY22. During FY23, 13 of those deficiencies were resolved entirely, notable progress was made toward resolution of 7 deficiencies, and 1 new deficiency was identified. The 19 deficiencies being reported in FY23 are associated primarily with:

- Untimely processing of requests for reasonable accommodations and untimely inquiries into harassment allegations;
- Shortfalls in data related to employees, applicants, recruitment activities, and mentoring programs;
- Missing EEO-related information in GSA's strategic plan and agency exit survey; and
- Efforts to conduct barrier analyses, implement the Affirmative Action Plan for PWD, and develop the annual MD-715 report.

Part H includes 11 corrective plans that collectively address the 19 reported FY23 deficiencies.

Part I addresses plans to eliminate identified barriers related to race, ethnicity, and sex (of which there were none identified in FY23).

Part J outlines the status and progress of agency Affirmative Action Plans designed to improve the (a) recruitment, (b) hiring, (c) advancement, and (d) retention of PWD.

Part J also addresses elimination of identified barriers related to PWD (of which four were previously identified).

Part A – Agency Identifying Information

TABLE 1: Agency Identifying Information

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	11001
6. ANSI Code	DC/11/50000

Part B – Total Employment

FIGURE 1: GSA Total Employment³

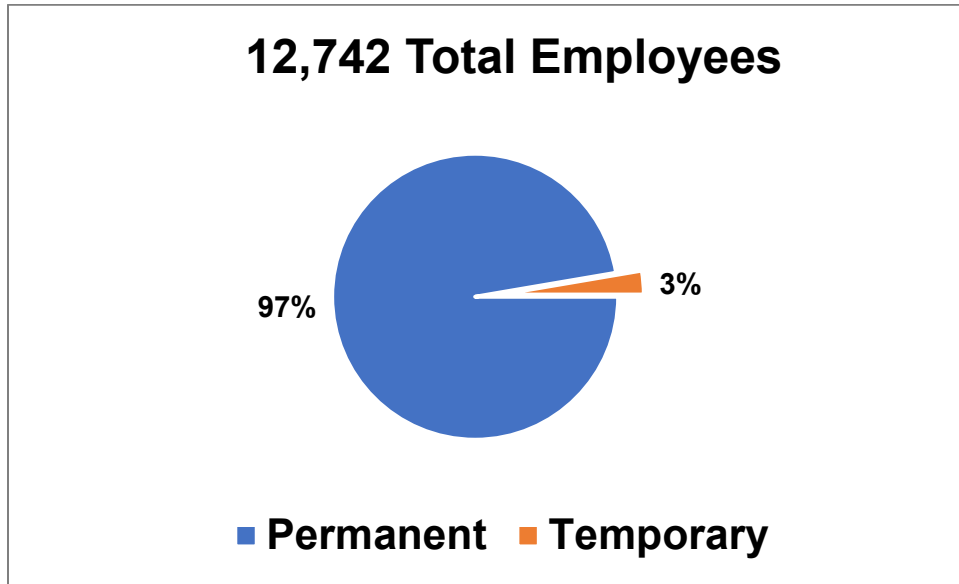
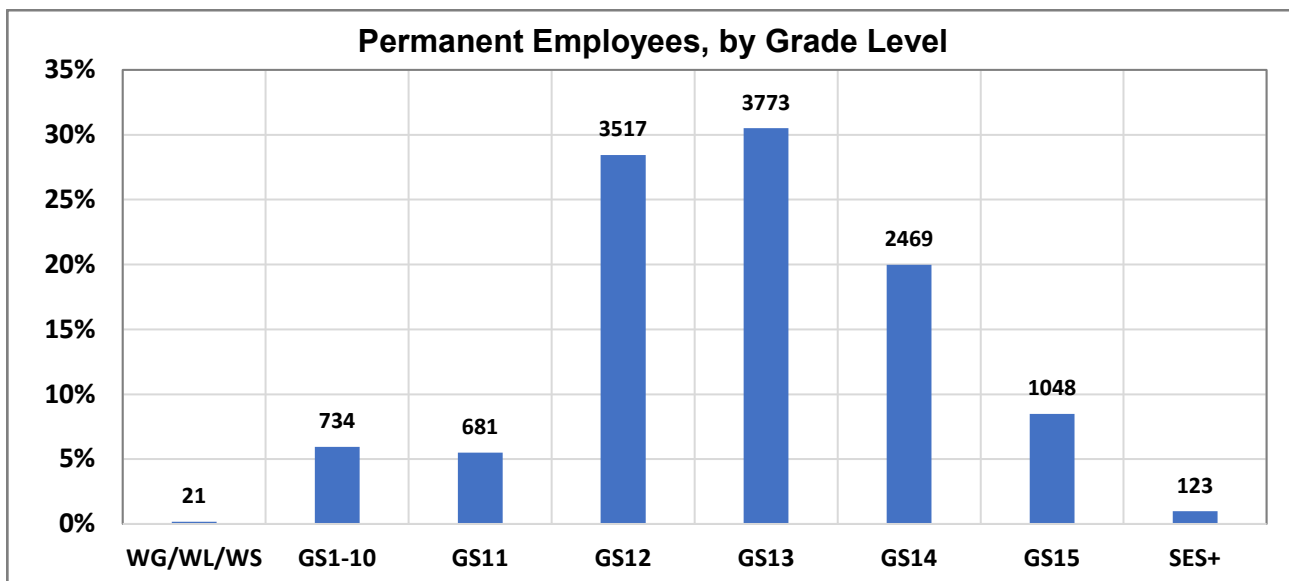


FIGURE 2: Distribution of Permanent Employees, by Grade Level⁴



³ Data as of September 30, 2023.

⁴ The SES+ category includes ES, EX, SL, ST, and CA (i.e., all non-GS/GM/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	Robin Carnahan	Administrator	EX-0340-III	202-501-2472	robin.carnahan@gsa.gov
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
Diversity & Inclusion Officer	Lance Green	D&I Program Manager	GS-0201-14	202-313-7703	lance.green@gsa.gov
Hispanic Employment Co-Program Manager (SEPM)	Judith Magana	Marketing Communications Program Manager	GS-0301-13	312-485-2547	judith.magana@gsa.gov
Hispanic Employment Co-Program Manager (SEPM)	Jeanette Lopez-Torralba	Program Management Team Supervisor	GS-0343-14	312-502-1102	jeanette.lopez-torralba@gsa.gov
Federal Women's Co-Program Manager (SEPM)	Jennifer Crouse	Management and Program Analyst	GS-0343-14	404-331-0058	jennifer.crouse@gsa.gov
Federal Women's Co-Program Manager (SEPM)	Jasmine Fang	Management and Program Analyst	GS-0343-13	212-264-8307	jasmine.fang@gsa.gov
Persons with Disabilities (PWD) Co-Program Manager (SEPM)	Hayden Shock	Program Analyst	GS-0343-12	571-365-6927 (text only)	hayden.shock@gsa.gov
Persons with Disabilities (PWD) Co-Program Manager (SEPM)	John Bagwell	Program Specialist	GS-0301-12	404-861-0590	john.bagwell@gsa.gov
Special Placement Program Coordinator (SPPC)	Lee Hall	Talent Teams Program Manager	GS-0201-14	301-821-3728	lee.hall@gsa.gov
Reasonable Accommodation Program Manager (OHRM)	Emily Claybrook	Human Resources Specialist	GS-0201-14	202-754-2273	emily.claybrook@gsa.gov
Reasonable Accommodation Program Manager (OIG)	Christopher Edwards	Employee Relations Officer	GS-0201-14	202-273-7387	christopher.edwards@gsaig.gov
Anti-Harassment Program Manager	Emily Claybrook	Human Resources Specialist	GS-0201-14	202-754-2273	emily.claybrook@gsa.gov
Alternative Dispute Resolution Program Manager	Jill Badami	EEO Specialist	GS-0260-13	646-285-8321	jill.badami@gsa.gov
Compliance Manager	Jennifer Jusseaume	EEO Manager	GS-0260-14	617-834-5528	jennifer.jusseaume@gsa.gov
Principal MD-715 Preparer	Paul Boinay	Affirmative Employment Program Manager	GS-0260-14	202-710-7346	paul.boinay@gsa.gov

Part D – List of Subordinate Components

GSA is comprised of the Office of the Administrator, which oversees twelve Staff Offices (including the Office of Civil Rights), two Services, two independent Offices, and eleven geographically aligned Regions. GSA organizational components include 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:

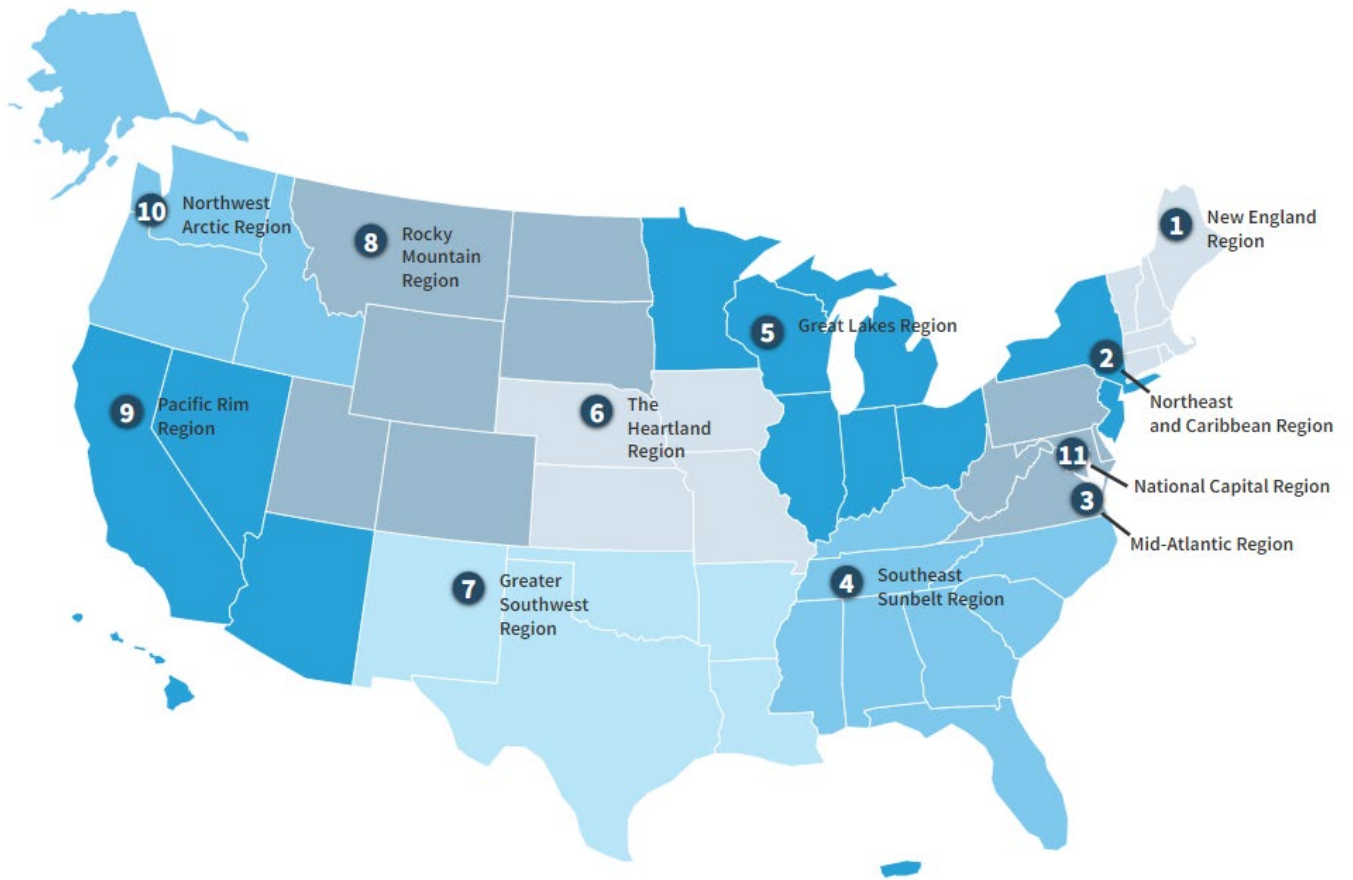
- Office of the Inspector General
- Civilian Board of Contract Appeals

Regions:

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

GSA regions are displayed in Figure 3 on the following page.

FIGURE 3: GSA Regions



Part E – Executive Summary

Per the Equal Employment Opportunity Commission (EEOC) *Instructions to Federal Agencies for EEO MD-715* (hereafter EEOC Instructions), “the purpose of this executive summary is to alert all managers and supervisors of their responsibilities regarding the status of the agency’s EEO program.”⁵ This is to ensure their understanding of both (1) the agency’s overall EEO program direction and (2) the expected contributions necessary for the agency to become a model employer. The content and format of this executive summary are directed by the EEOC. They are intended to provide a quick and informative review of all EEO-related deficiencies that have been identified during the previous fiscal year(s), as well as corrective actions planned to be taken during the current or subsequent fiscal year(s). Additionally, the executive summary discusses root cause analysis (barrier investigation) efforts undertaken during the past year, as well associated findings and plans to mitigate or eliminate any EEO barriers identified.

In accordance with the EEOC Instructions, this executive summary contains ten mandatory sections (labeled Part E.1 through Part E.10) that provide brief narrative descriptions of:

- The agency’s mission and mission-related functions (Part E.1).
- Strengths (e.g., leading practices) and weaknesses (e.g., compliance deficiencies) of the agency relating to fulfillment of its EEO-related obligations, evaluated against relevant measures and performance standards within the framework of the EEOC’s “Six Essential Elements of a Model EEO Program” (Parts E.2 – E.7).
- Accomplishments and activities undertaken directly connected to (a) the annual compliance assessment (including efforts to identify and correct program deficiencies) and (b) MD-715 analyses (including trigger⁶ identification, barrier⁷ investigations, and the elimination or mitigation of EEO barriers (when identified)); as well as (c) efforts to correct information or data gaps, if any, that prevent effective analyses and/or assessments (Parts E.8 and E.9).
- Action items and plans to be implemented during the upcoming year (Part E.10).

⁵ See EEOC Instructions, Reporting and Line by Line Instructions for Executive Summary.

⁶ Triggers are “red flags” that indicate the possible presence of a discriminatory barrier (see Footnote 7, below). Agencies are required to identify triggers using workforce data, applicant data, career development data, climate survey results, exit surveys, EEO complaints, allegations of harassment, grievances, requests for reasonable accommodations, and other mandatory sources of information.

⁷ A barrier is an agency policy, procedure, practice, or condition that limits or tends to limit employment opportunities for a particular group, based on sex, race, ethnic background, or disability status.

Important Notes about EEO, DEIA, & MD-715 Obligations:

EEO is distinctly separate from the diversity, equity, inclusion, and accessibility (DEIA) program. EEO focuses on preventing and addressing discrimination (toward employees, former employees, and applicants for employment), as well as on developing and implementing lawful affirmative actions designed to (a) recruit, (b) hire, (c) advance, and (d) retain persons with disabilities. Aspects of EEO therefore touch on accessibility, and its goal of eliminating discrimination also tends to improve inclusion; however, EEO is not focused on achieving outcomes related to diversity demographics. The EEO program routinely compiles, analyzes, and reports data related to race, ethnicity/national origin, and sex; however, there are no EEO-related numerical goals or associated representation targets related to any of those particular group characteristics.⁸

Equality and equity are also different. The specific, objective requirements of equal employment opportunity programs are rooted in laws and regulations dating back decades, and have been further refined by EEOC directives, guidance, and instructions, which include explicit standards, measures, and procedures. In contrast, DEIA is a relatively new concept within the federal government. The June 25, 2021 Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce⁹ lays the groundwork; however, standards of success, data-related requirements, implementation strategies, and reporting obligations associated with DEIA are still being refined. Executive Order 14035 requires agency heads to “seek opportunities to establish a position of chief diversity officer or diversity and inclusion officer (*as distinct from an equal employment opportunity officer*), with sufficient seniority to coordinate efforts to promote diversity, equity, inclusion, and accessibility within the agency.” It also requires that the Government-wide DEIA plan “promote a data-driven approach to increase transparency and accountability, *which would build upon, as appropriate, the EEOC’s Management Directive 715 reporting process.*”

It is therefore important that GSA’s EEO-related performance be assessed against the explicit procedures, measures, standards, and reporting criteria directed by MD-715 and the EEOC Instructions, and to specifically not consider efforts spent on DEIA activities to be synonymous with fulfilling the agency’s distinctly separate and exhaustively codified EEO-related obligations.

⁸ 5 U.S.C. § 2302(b) prohibits agencies from discriminating for or against any employee or applicant for employment on the basis of race, national origin, or sex (as well as on the basis of color, religion, age, handicapping condition, marital status, or political affiliation).

⁹ See <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/25/executive-order-on-diversity-equity-inclusion-and-accessibility-in-the-federal-workforce/>

E.1. Mission of GSA & EEO Program

Purpose and Structure of GSA

The mission of the U.S. General Services Administration (GSA) is to deliver the best customer experience and value in real estate, acquisition, and technology services to the government and the American people. GSA's four strategic goals (financially and environmentally sustainable, accessible, and responsive real estate solutions; modern, accessible, and streamlined acquisition services; a digital government delivered through trusted, accessible, and user-centered technologies; and improved government operations through interagency collaboration and shared services) align the agency's mission, set direction, and guide operational planning.

Headquartered in Washington, DC, GSA serves and supports more than 60 Federal departments and agencies through its two main lines of business, the Federal Acquisition Service and the Public Buildings Service, twelve staff offices (including the Office of Civil Rights), eleven regional offices, and two independent offices.

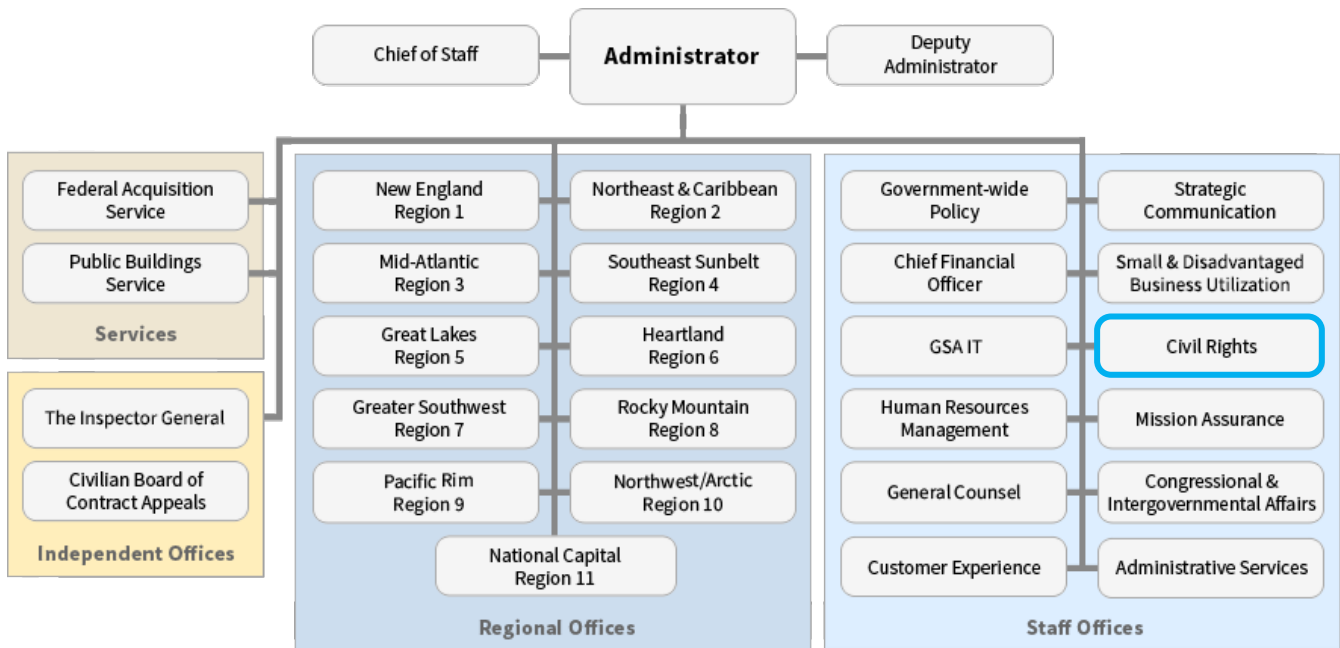
GSA is the nation's largest public real estate organization, providing workspace for over one million federal workers. In FY23, GSA controlled 363 million square feet in 8,400 buildings used to support federal agencies' missions in more than 2,200 communities nationwide.

GSA is also the premier source for equipment, supplies, telecommunications, and integrated information technology to federal agencies. In FY23, GSA helped agencies procure \$100 billion in goods and services, managed hundreds of thousands of fleet vehicles, assisted tens of thousands of federal travelers through GSA's electronic travel system, and served as the focal point for data, information, and services offered by the federal government to its citizens.

The current GSA organizational chart is available on GSA's public website at <https://www.gsa.gov/about-us/gsa-organization>. The GSA's principal EEO official (the Associate Administrator, Office of Civil Rights) reports directly to the agency head (GSA Administrator)¹⁰.

¹⁰ In accordance with 29 C.F.R. § 1614.102(b)(4).

FIGURE 4: GSA Organization Chart



GSA’s EEO Program

GSA’s EEO Program formally resides within the Office of Civil Rights (OCR); however, EEO is in an agency-wide responsibility. EEO obligations extend well beyond OCR, to GSA’s senior leaders, managers, and supervisors, as well as to other Services and Staff Offices (SSOs), including the Office of Human Resources Management (OHRM). Those obligations require all parties to not only engage and collaborate in the execution of key EEO functions 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, regulations, and Executive Orders, including Titles VI and VII of the Civil Rights Act of 1964, as amended (Title VI and VII), Sections 501, 504, and 508 of the Rehabilitation Act of 1973, as amended (Rehabilitation Act), and the EEOC’s federal-sector regulations at 29 C.F.R. § Part 1614, as well as EEOC Management Directive 110¹¹ and MD-715.

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 and value diversity.
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.

¹¹ See EEOC MD-110 (Aug. 5, 2015), at <https://www.eeoc.gov/federal/directives/md110.cfm>.

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

OCR, in partnership with and through other GSA stakeholders, adheres to and promotes the six elements identified by the EEOC in MD-715 as essential for model EEO programs under Title VII¹² and the Rehabilitation Act¹³. The six essential elements¹⁴ 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
- F. Responsiveness and legal compliance

To gauge each agency's status in attaining and maintaining a model EEO program¹⁵, the EEOC requires annual completion of the Part G Self-Assessment Checklist.¹⁶ Containing 156 relevant metrics, the checklist outlines "a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715" and one that "permits EEO Directors to...highlight for their senior staff, deficiencies...that the agency must address to comply with MD-715's requirements."

¹² 42 U.S.C. § 2000e et seq.

¹³ 29 U.S.C. § 791 and the Americans with Disabilities Act Amendments Act of 2008 (Pub. L. 110-325).

¹⁴ See MD-715, at Section II; see also EEOC Instructions, at Section I.

¹⁵ In this context, "EEO program" includes all responsibilities, agency-wide, related to and/or supporting EEO, including not only obligations of OCR's EEO and Affirmative Employment Programs, but also the responsibilities of all agency leaders, managers, supervisors, Services and Staff Offices, and programs.

¹⁶ <https://www.eeoc.gov/federal-sector/management-directive/md-715-part-g-agency-self-assessment-checklist>.

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

MD-715 requires agency heads and other senior management officials to demonstrate a firm commitment to equality of opportunity for all employees and applicants for employment.¹⁷ Relevant measures assess the agency head's EEO policy statement, agency communications and recognition mechanisms relating to EEO, and how effectively the agency ensures that EEO principles are instilled into its culture. Per MD-715:

“Agencies must translate equal opportunity into everyday practice and make those principles a fundamental part of agency culture. This commitment to equal opportunity must be embraced by agency leadership and communicated through the ranks from the top down. It is the responsibility of each agency head to take such measures as may be necessary to incorporate the principles of equal employment opportunity into the agency's organizational structure. To this end, agency heads must issue a written policy statement expressing their commitment to equal employment opportunity (EEO) and a workplace free of discriminatory harassment.”¹⁸

During FY23, GSA leadership demonstrated commitment to EEO through several actions associated with the measures under this essential element:

- The GSA Administrator issued a new EEO policy statement on July 11, 2023.
- Before the end of the FY23 reporting period, GSA ensured 100% of supervisors and managers were compliant with relevant EEO training requirements, having received their mandatory training within 90 days of accession and every two years thereafter.
- Beyond mandating formal training for supervisors and managers, GSA requires all employees to regularly receive comprehensive training covering all EEO topics addressed within the Part G self-assessment.

¹⁷ 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”).

¹⁸ See MD-715, II.A. Essential Elements of Model Agency Title VII and Rehabilitation Act Programs.

- GSA monitors workforce perceptions through participation in the annual Office of Personnel Management (OPM) Federal Employee Viewpoint Survey (FEVS). GSA's employee response rate in the 2023¹⁹ (and 2022²⁰) FEVS was 68% (32% higher than the 2023 Government-wide average). With respect to FEVS indices, GSA saw an increase in all 2023 index measures compared to 2022 results. Employee Engagement Index (EEI)²¹ scores remain higher than the Government-wide averages, both overall and within each of the three individual EEI subfactors.²²
- Senior leadership directly facilitated improvements to GSA's ability to assess integration of EEO throughout its culture by improving access to relevant employee data that supports compliance assessments, trigger identification, and root cause analysis. In FY23, performance rating data, exit survey data, and disciplinary data were added to the annually analyzed data sets. Additionally, reasonable accommodation data and anti-harassment program data was expanded to improve program management and outcomes, associated root cause analyses, and assessments of program effectiveness, as well as intersectional analyses and correlation of findings across data sets.

¹⁹ The 2023 FEVS cycle was administered May 8, 2023 through June 23, 2023. FY23 FEVS data was released partially in FY23 and partially in early FY24, after the conclusion of the fiscal year, but in time for relevant analyses to be completed and key findings included in this MD-715 report.

²⁰ The 2022 FEVS was administered May 30, 2022 through July 15, 2022, and its results were released in FY23 and are also included in this MD-715 report.

²¹ See Office of Personnel Management 2023 FEVS Governmentwide Management Report at: <https://www.opm.gov/fevs/reports/governmentwide-reports/governmentwide-reports/governmentwide-management-report/2023/2023-governmentwide-management-report.pdf>.

²² EEI subfactors include (a) Leaders Lead, (b) Supervisor, and (c) Intrinsic Work Experience.

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

EEOC Instructions state that “to ensure that federal agencies achieve their goal of being a model workplace, all managers and employees must view EEO as an integral part of the agency’s strategic mission. The success of the agency’s EEO program ultimately depends on decisions made by individual managers.”²³ In accordance with this element,²⁴ the agency must:

- Maintain a reporting structure that provides the principal EEO official with regular access to the agency head and other senior management officials for reporting on the effectiveness, efficiency, and legal compliance of the agency’s Title VII and Rehabilitation Act programs.
- Ensure that EEO professionals are involved with, and consulted on, management and personnel actions, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development programs.
- Allocate sufficient funding and qualified staffing to support the success of EEO efforts, not only within OCR, but throughout the agency, including adequate resources to execute:
 1. Core EEO functions (including EEO complaints processing, annual compliance assessments, barrier analyses, and EEO training).
 2. Critical related programs (including the Anti-Harassment Program, Reasonable Accommodation Program, and mandatory Special Emphasis Programs).
 3. Effective data collection and tracking (including systems for managing and analyzing workforce employment lifecycle demographics, applicant flow data, EEO complaints, allegations of harassment, and requests for reasonable accommodation).
- Ensure that all agency managers and supervisors receive training on their responsibilities relating to all of the following topics: (a) reasonable accommodations, (b) anti-harassment, (c) EEO complaints, (d) alternative dispute resolution, and (e) effective supervisory/managerial communications and interpersonal skills.
- Ensure that senior managers participate in barrier analysis, implementation of Special Emphasis Programs, and development and implementation of EEO-related action plans.

²³ See EEOC Instructions, Section I.II.

²⁴ See MD-715, Model Agency Title VII and Rehabilitation Act Programs, at Section II.B.

Additionally, this element requires that the importance of EEO to the agency's mission be emphasized, not only by placing the principal EEO official under the immediate supervision of the head of the agency²⁵, but also by clearly depicting that reporting relationship on the agency's organizational chart and by incorporating EEO principles into the agency's strategic plan.

GSA supports this element through its compliant reporting structure, integration of EEO into its strategic decision-making, and through resourcing of core EEO functions within OCR (e.g., complaints processing and the Affirmative Employment Program). There are, however, several areas within this element that require improvement in order to become fully compliant:

- The GSA FY2022-2026 Strategic Plan includes DEIA principles, but does not reference EEO principles (e.g., non-discrimination, barrier elimination).
- While notable progress was made in FY23 toward addressing several key deficiencies, significant improvements could not be made simultaneously in all program areas, so FY24 efforts will now focus on:
 1. Execution of root cause analyses to investigate triggers and identify barriers;
 2. Key improvements to workforce and applicant data necessary to support those efforts;
 3. Implementation and tracking of corrective plans to resolve remaining deficiencies and eliminate identified barriers.

Significant progress was made within the Reasonable Accommodation Program and Anti-Harassment Program, especially related to the collection, maintenance, use, and sharing of relevant data, as well as the use of that data to support both program oversight and MD-715 reporting and analyses. Very notable progress was made in the timeliness of processing of requests for reasonable accommodation, and data improvements now permit the agency to track not only the timeliness of agency approval or denial decisions, but also the time required to provide approved accommodations. Future efforts will now focus on bringing timeliness into full compliance and incorporating mechanisms to determine if provided accommodations are effective. Additionally, enhanced inter-office coordination between OCR and OHRM significantly improved the tracking of allegations of harassment, including those initially raised during the EEO complaints process, resulting in substantial improvements to the timeliness of initial inquiries. As

²⁵ See MD-110 Chapter 1.III.B.

a result of those improvements, both programs are notably closer to becoming fully compliant.

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

MD-715 explains that a model Title VII and Rehabilitation Act program will hold managers, supervisors, personnel officers, and EEO officials accountable for effective implementation and management of the agency's EEO-related obligations. Per MD-715, in ensuring such accountability, the agency must:

- Ensure that the EEO and human resources (HR) offices collaborate on (a) conducting barrier analyses, (b) preparing the Annual Agency EEO Program Status (MD-715) Report, (c) executing the Affirmative Action Plan for PWD, (d) conducting outreach and recruiting, and (e) training managers and supervisors.
- Ensure that the HR office timely provides accurate and complete employee, applicant, and other data required to prepare the MD-715 data tables.
- Ensure that the HR office provides timely access to complete and accurate data and information from *other* sources (beyond employee and applicant data), including exit survey data, climate assessment survey results, and data on allegations of harassment, requests for reasonable accommodations, and grievances.
- Ensure effective coordination between the EEO program and relevant HR programs, including the Anti-Harassment Program, Federal Equal Opportunity Recruitment Program²⁶ (FEORP), Disabled Veterans Affirmative Action Program²⁷ (DVAAP), and Selective Placement Program²⁸ (SPP) for persons with disabilities.
- Establish and implement procedures to prevent all forms of discrimination, including harassment and failure to provide reasonable accommodations to qualified PWD.
- Ensure that 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.

²⁶ <https://www.opm.gov/policy-data-oversight/diversity-equity-inclusion-and-accessibility/reports/#url=Federal-Equal-Opportunity-and-Recruitment-Program>

²⁷ <https://www.chcoc.gov/content/agency-disabled-veterans-affirmative-action-program-dvaap-annual-reporting-15>

²⁸ <https://www.opm.gov/policy-data-oversight/disability-employment/selective-placement-program-coordinator/>

- Ensure that rating officials evaluate the performance of managers and supervisors based on nine EEO-related criteria: (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.

Strengths related to this element:

- One of GSA's greatest overall strengths in this element is the relevant data and related support provided by OHRM. Collectively, OHRM annually provides more than 1 million data elements to support MD-715 analysis and reporting obligations.
- Some of the most significant FY23 improvements related to increased timeliness and expanded access to regular and ad hoc workforce data to support MD-715 barrier analyses and reporting requirements (although some shortfalls remain).
- In addition, coordination between the EEO and HR offices on tracking of allegations of harassment raised during the EEO complaints process is also now a strength.

Within this element, further improvements can be made in the inter-office collaboration on barrier analysis and elimination, implementation of the Affirmative Action Plan for PWD, and coordination between interrelated EEO and HR programs (e.g., the Affirmative Employment Program (AEP), SPP, FEORP, and DVAAP). Additionally, key data-related improvements are necessary to address deficiencies in workforce and applicant data required to support MD-715 reporting and to enable effective barrier analysis.

- While significant improvements were made in the collection, management, and sharing of harassment data between the EEO and HR offices, leading to improved outcomes, not all allegations of harassment received timely initial inquiries.
- While very notable improvements were made to the processing timeliness of requests for disability-related reasonable accommodations, not all FY23 accommodation requests were timely processed and not all approved accommodations were timely provided.

- Comprehensive MD-715 data requirements are provided in the EEOC Instructions.²⁹ While agency data related to employees, applicants, and career development is generally accurate and complete, several critical technical deficiencies remain, and are reportable under Part G and/or Part J³⁰ of the MD-715 report. Those deficiencies prevent the development of accurate MD-715 data tables (a reportable deficiency), negatively impact both trigger identification and barrier analysis, and directly impact GSA's ability to address its affirmative action obligations associated with PWD and persons with targeted disabilities (PWTD)³¹ (deficiencies that are reported in Part J). Progress toward resolving those deficiencies is a FY24 priority.

²⁹ See EEOC Instructions, Section IV – Interpretation and Completion of Workforce Data Tables.

³⁰ Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of PWD.

³¹ Targeted disabilities include 12 specific disabilities identified on OPM Standard Form 256 (SF-256) that are independently tracked by EEOC and OPM because of historical issues related to under-employment and discrimination. Targeted disabilities are a subset of all disabilities (as PWTD are a subset of PWD). Examples include (but are not limited to) developmental or intellectual disabilities, deafness, blindness, psychiatric disorders, missing extremities, seizure disorders, and significant mobility impairments.

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

According to MD-715:

“Agencies have an ongoing obligation to *prevent* discrimination on the bases of race, color, national origin, religion, sex, age, reprisal, and disability, and to 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.”³²

In addition, MD-715 also states that:

“Each agency must develop and maintain an affirmative action program plan for the hiring, placement, and advancement of individuals with disabilities”³³ and that agencies have a “responsibility to provide employment opportunities for qualified applicants and employees with disabilities, especially those with targeted disabilities.”³⁴

To those ends, this element requires that:

- Agencies regularly (at least annually) identify potential signs of discrimination (triggers) using both (1) mandatory MD-715 data tables and (2) specific other sources of information, including, but not limited to: (a) data on reasonable accommodations; (b) data pertaining to the anti-harassment program; and (c) data from exit surveys (which must include questions on how the agency can improve recruitment, hiring, inclusion, advancement, and retention of PWD³⁵).
- Agencies conduct systematic root cause analyses to identify potential barriers, specifically by using relevant other sources of information (beyond workforce/applicant data).
- Agency HR and EEO offices collaborate to produce and implement the Affirmative Action Plan for PWD (Part J of the MD-715 report).
- When barriers are identified, agencies must develop and implement plans to eliminate them.

³² See MD-715, Section II.D.

³³ Ibid, Part B.I.

³⁴ Ibid, Part B.III.

³⁵ See EEOC Instructions, at Section I.IV.B.5 and Section III (Part J Section V.A.4)

GSA has three notable strengths in this element:

- The process for using employee and applicant data *to identify triggers* is both highly refined and automated, making that process both very effective and efficient, speeding the initial step of the barrier investigation process and enabling consistent analyses from year to year.
- In FY23, inter-office sharing of critical data was significantly improved. In particular, effective, collaborative data sharing between OHRM and OCR in support of affirmative employment analyses and timely anti-harassment inquiries directly contributed to positive outcomes. OHRM and OCR adopted a structured means for requesting and sharing ad hoc data used to support root cause analyses and significant improvements were made related to the capture, maintenance, use, and sharing of workforce data and data on reasonable accommodations, harassment allegations, organizational climate surveys, disciplinary actions, and performance ratings. Additionally, sharing of Pulse Survey data between the Office of Customer Experience and OCR enabled consistent analyses of demographic participation rates and responses across multiple GSA organizational survey instruments.
- GSA continued to refine its Alternative Benchmark Tool, which is used to generate relevant organization-specific benchmarks from Census data and EEOC occupational crosswalks. Previously, GSA revised 2014-2018 Census American Community Service (ACS) data to align with OPM and EEOC data aggregation rules for Two or More Races, significantly improving the accuracy of benchmarks for Black or African American, Asian, American Indian or Alaska Native, and Two or More Races demographic groups. In FY23, the tool was further improved to incorporate rate differences between the Male and Female groups in each race/ethnic category, and the revised tool and alignment methodology were then shared with the EEOC and other federal agencies.

GSA also has areas within this essential element that require further improvement:

- GSA's exit survey language was modified during FY23 to add responses related to discrimination and harassment; however, the survey lacks questions required by MD-715³⁶ on how the agency can improve the recruitment, hiring, inclusion, and advancement of individuals with disabilities.
- GSA did not fully implement its plans to eliminate the four identified barriers.

³⁶ See EEOC Instructions, Section I.IV.A(3) and 29 C.F.R. § 1614.102(e) and 203(d)(1)(iii)(C)

- While GSA exceeds both the Federal goals and agency-specific goals for PWD and PWTD participation rates, improvements are necessary to fulfill Affirmative Action Plan (AAP) obligations in support of (1) recruitment, (2) hiring, (3) advancement, and (4) retention of PWD and PWTD³⁷ and to resolve associated Part G deficiencies and EEO barriers. While improvements were made in FY23 to the coordination between the AEP and Reasonable Accommodations Program and progress was made toward eliminating barriers related to reasonable accommodations and the Schedule A(u) appointment authority,³⁸ closer coordination is required between interrelated programs that affect AAP for PWD outcomes:
 1. Reasonable Accommodation Program
 2. Disabled Veterans Affirmative Action Program
 3. Selective Placement Program
 4. Utilization of the Schedule A(u) hiring authority
 5. Management and conversion of employees appointed under Schedule A(u)
 6. Management of disability status codes for individuals hired under Schedule A(u)
 7. Management of disability codes for disabled veterans hired under the Veterans' Recruitment Appointment authority³⁹ (VRA), Veterans Employment Opportunity Act authority⁴⁰ (VEOA), or the 30% or More Disabled Veteran hiring authority⁴¹
 8. Management of disability status codes for disabled veterans with OPM veterans' preference codes associated with service-connected disabilities⁴²

³⁷ 29 C.F.R. § 1614.203(d)(7)(ii) and MD-715 Part G require agencies “to take specific steps reasonably designed to gradually increase the number of persons with disabilities or targeted disabilities employed at the agency.” MD-715 Part J details agency reporting requirements for the “Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities.”

³⁸ 5 CFR § 213.3102(u) - Appointment of persons with intellectual disabilities, severe physical disabilities, or psychiatric disabilities (more commonly known as “Schedule A” or “Schedule A(u)”).

³⁹ See <https://www.opm.gov/fedshirevets/hiring-officials/strategic-recruitment-and-hiring/veterans/>.

⁴⁰ See <https://www.opm.gov/fedshirevets/hiring-officials/strategic-recruitment-and-hiring/veterans/#url=Veterans-Employment-Opportunities-Act>.

⁴¹ See <https://www.opm.gov/fedshirevets/hiring-officials/strategic-recruitment-and-hiring/veterans/#url=30-Percent-Disabled>.

⁴² See <https://www.opm.gov/policy-data-oversight/veterans-services/vet-guide-for-hr-professionals/> and <https://dw.opm.gov/datastandards/referenceData/1587/current?index=V>. Veterans' preference codes 4 and 6 *always* indicate status as a disabled veteran. Veterans' preference code 3 *may* indicate status as a disabled veteran.

E.6. Essential Element E: Efficiency

MD-715 “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.”⁴³ To that end, this element requires that agencies:

1. Have an efficient, fair, and impartial complaint resolution process.
2. Have a neutral EEO process, separate from the agency’s defensive function and other agency functions with conflicting or competing interests.
3. Establish and encourage widespread use of alternative dispute resolution (ADR) to facilitate early, effective, and efficient informal resolution of disputes.
4. Maintain systems to accurately collect, monitor, and analyze all the following types of data:
 - Employee race, national origin, sex, and disability status demographics
 - Applicant flow data concerning race, national origin, sex, and disability status
 - Processing of requests for disability-related reasonable accommodations
 - Processing of allegations of harassment
 - Recruitment activities
 - EEO complaint activity

FY23 showed an increase in overall complaint activity, relative to FY21 and FY22. In FY23, all investigations and final agency decisions were timely; however, one EEO complaint was untimely counseled by one day.

One strength in this element is the presence of a dedicated Attorney Advisor (GS-0905) within OCR’s Adjudication and Compliance Team to help ensure the neutrality of the EEO process.

Most deficiencies in this element are associated with the requirement to maintain effective data collection and management systems necessary to evaluate EEO-related programs, including (1) employee data, (2) applicant flow data, and (3) recruitment data. Notable changes were

⁴³ See MD-715, Model Agency Title VII and Rehabilitation Act Programs, at Section II.E and EEOC Instructions, at Section I.V.

made in FY23 to improve the capture, management, use, and sharing of anti-harassment data and reasonable accommodations data, resolving FY22 deficiencies in those two topic areas, and significant improvements were made to sharing of available data elements; however, further improvements are necessary to address critical data elements that are incomplete and/or inaccurate, and to ensure data collection and maintenance practices are compliant with applicable regulations and OPM data classification standards.

Note:

- The Part G checklist comprehensively assesses compliance by evaluating separate aspects of key requirements using different measures, within different essential elements, each focused on a particular EEO obligation. With respect to data, element C assesses *required outcomes* (i.e., timely, accurate, and complete data), while essential element B assesses the *adequacy of funding and qualified staffing resources* (to achieve those outcomes) and element E measures the *adequacy of systems to accurately collect, monitor, and analyze data* (in this context, “systems” include hardware, software, and associated data management procedures). Thus, deficient outcomes associated with each of the five data areas identified above may be a result of a combination of shortfalls in (a) staffing resources, (b) staff or user training, (c) data systems, and/or (d) data management procedures. As a result, essential elements B, C, and E each include unique but interrelated deficiencies relating to data.
- Every Part G deficiency must be addressed by a Part H corrective plan. Because various Part G measures collectively focus on particular issues (e.g., data), multiple deficiencies can often be addressed by a single Part H corrective plan. For example, Part H corrective plan H.2 addresses *three* different Part G deficiencies associated with workforce data, corrective plan H.11 addresses *two* separate deficiencies related to applicant flow data, and corrective plan H.8 addresses *five* deficiencies associated with barrier identification and elimination.

E.7 Essential Element F: Responsiveness and Legal Compliance

According to EEOC Instructions, agencies must:

- Have processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.
- Comply with the law, including EEOC regulations, management directives, orders, and other written instructions.
- Report program efforts and accomplishments to EEOC.

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

To provide a more comprehensive understanding of all of the compliance deficiencies that are being reported in FY23, Table 4 consolidates and summarizes the deficiencies, along with their respective Part G measures, essential elements, and corresponding Part H corrective plans. The complete Part G Self-Assessment Checklist begins on page 104.

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

Essential Element & Measure				Questions	Part H Plan(s)	
1	B	3	b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? If "yes", identify the EEO principles in the strategic plan in the comments column.	H.1	
				Has the agency allocated sufficient funding and qualified staffing to:		
2	B	4	a	2	Conduct a thorough barrier analysis of its workforce?	H.8
3	B	4	a	7	Maintain accurate data collection/tracking systems for workforce and applicant flow data?	H.2 & H.11
4	B	4	a	10	Effectively manage its reasonable accommodation program?	H.4
5	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
6	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
7	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:		
8	C	4	e	1	Implement the Affirmative Action Plan for PWD?	H.6 & H.7
9	C	4	e	2	Develop and/or conduct outreach and recruiting initiatives?	H.6 & H.7
10	C	4	e	4	Identify and remove barriers to EEO in the workplace?	H.8
11	C	4	e	5	Assist in preparing the MD-715 report?	H.6 & H.8
12	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?	H.9
13	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.8
14	D	4	b		Does the agency take specific steps to ensure qualified PWD are encouraged to apply for vacancies?	H.6
15	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?	H.6
16	E	1	a		Does the agency timely provide EEO counseling, pursuant to 29 CFR § 1614.105?	H.10
				Does the agency have systems in place to accurately collect, monitor, and analyze:		
17	E	4	a	2	The race, national origin, sex, and disability status of agency employees?	H.2
18	E	4	a	3	Recruiting activities?	H.7
19	E	4	a	4	External/internal applicant flow data concerning applicants' race/national origin/sex/disability status?	H.11

Notable progress was made in FY23 toward attaining compliance in each of these measures.

The deficiency in this Part G measure was new in FY23

E.8 Workforce Analysis

The Affirmative Employment Program conducts comprehensive annual analyses of employee data, applicant data, and relevant information from many different sources, in order to identify and investigate “triggers” (indicators of *potential* barriers to equal employment opportunity).

To enable consistent workforce analyses and reporting across the Federal government, the EEOC requires all agencies to develop specified mandatory tables, and to use that information to conduct systematic analyses of employee and applicant participation (representation) rates in various employment activities and key milestones spanning the entire employment life cycle.

Twenty major categories of data and information are regularly analyzed, of which data relating to the organization of the GSA workforce and employee demographic data are key focus areas.

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

Employee Data	Harassment Allegations
Applicant Flow Data	Grievances
Competitive Development Program ⁴⁴ Data	EEO Complaints
Internship Data	Organizational Climate Surveys (FEVS and Pulse)
Mentoring Program Data	Schedule A(u) Hires and Conversions
Detail Opportunities	Exit Surveys
Temporary Promotion Opportunities	Disciplinary Actions
Other Training Programs/Opportunities ⁴⁵	Performance Ratings
Disability-Related Reasonable Accommodations	Special Emphasis Program Engagements
Recruitment Data	Career Ladder Programs

The FY23 GSA workforce was comprised of 12,742 permanent and temporary employees in 2 services, 12 staff offices, and 2 independent offices located throughout 11 regions. GSA employees encompass 9 different pay plans, 98 different occupational series, and grade levels ranging from Wage Grade employees to members of the Senior Executive Service.

⁴⁴ GSA Competitive Development Programs (CDPs) provide leadership development opportunities via recognized *external* programs that focus on leadership competencies required for current and future leaders (e.g., Harvard Kennedy School, White House Leadership Development Program, Partnership in Public Service, OPM President’s Management Council, College of Information and Cyberspace National Defense University, eCornell, Graduate School USA).

⁴⁵ 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.

The GSA workforce is comprised primarily of permanent employees (97%) and General Schedule (GS and GM) employees (98.8%), the majority of which (81%) fall between grade levels GS12 to GS14. Only 12% of GSA employees are in grade levels below GS11. A total of 126 employees (1%) are in senior pay plans (i.e., ES, EX, SL, ST, or CA) and 21 employees (0.2%) are in positions in the Federal Wage System (WG, WL, or WS). Roughly 28% of employees are GS12, 30% are GS13, and 30% are above GS13.

TABLE 6: FY23 Total Populations, by Grade Level

Pay Plans	Population	Percentages	
WG/WL/WS	21	0.2%	12%
GS1-10	786	6.2%	
GS11	693	5.4%	
GS12	3556	27.9%	28%
GS13	3802	29.8%	30%
GS/GM14	2510	19.7%	30%
GS15	1248	9.8%	
SES+	126	1.0%	

The GSA workforce is divided among 98 occupational series, of which the 20 most populous series each have 100 or more employees, and collectively account for 90% of all employees.

TABLE 7: 20 Most Populous GSA Occupational Series

Series #	Series Title	#	%
1102	CONTRACTING	2187	17%
1101	GENERAL BUSINESS AND INDUSTRY	1917	15%
0343	MANAGEMENT AND PROGRAM ANALYSIS	1259	10%
0301	MISCELLANEOUS ADMINISTRATION AND PROGRAM	1159	9.1%
2210	INFORMATION TECHNOLOGY MANAGEMENT	1025	8.0%
1176	BUILDING MANAGEMENT	906	7.1%
1170	REALTY	502	3.9%
2150	TRANSPORTATION OPERATIONS	362	2.8%
0501	FINANCIAL ADMINISTRATION AND PROGRAM	304	2.4%
0560	BUDGET ANALYSIS	243	1.9%
0809	CONSTRUCTION CONTROL TECHNICAL	220	1.7%
0201	HUMAN RESOURCES MANAGEMENT	218	1.7%
0801	GENERAL ENGINEERING	204	1.6%
0905	GENERAL ATTORNEY	186	1.5%
0510	ACCOUNTING	168	1.3%
1670	EQUIPMENT SERVICES	146	1.1%
0340	PROGRAM MANAGEMENT	145	1.1%
0808	ARCHITECTURE	141	1.1%
1104	PROPERTY DISPOSAL	111	0.9%
0511	AUDITING	100	0.8%

The sizes of permanent and temporary employee populations vary considerably between the 2 services, 12 staff offices, and 2 independent offices, as well as the Immediate Office of the Administrator and the Offices of the Regional Administrators.

TABLE 8: Populations of GSA Services and Staff Offices

SSO	SSO Description	Perm	Temp	Total	%
PBS	Public Buildings Service	5560	74	5634	44%
FAS	Federal Acquisition Service	4091	240	4331	34%
OCFO	Office of Chief Financial Officer	787	6	793	6.2%
GSA IT	Office of GSA Information Technology	466	13	479	3.8%
OHRM	Office of Human Resources Management	327	8	335	2.6%
OIG	Office of the Inspector General	246	1	247	1.9%
OGP	Office of Government-wide Policy	231	4	235	1.8%
OGC	Office of the General Counsel	174	4	178	1.4%
OAS	Office of Administrative Services	127	2	129	1.0%
OMA	Office of Mission Assurance	114	4	118	0.93%
OSC	Office of Strategic Communication	96	3	99	0.78%
OSDBU	Office of Small & Disadvantaged Business Utilization	35		35	0.27%
OCIA	Office of Congressional & Intergovernmental Affairs	28	1	29	0.23%
CBCA	Civilian Board of Contract Appeals	27	3	30	0.24%
IOA	Immediate Office of the Administrator	19	12	31	0.24%
OCR	Office of Civil Rights	17		17	0.13%
OCE	Office of Customer Experience	13		13	0.10%
ORA	Offices of the Regional Administrators	8	1	9	0.07%
		12366	376	12742	

Along with other organizational categories (e.g., pay plans, series, grade levels, and offices), MD-715 also requires agencies to capture, maintain, analyze, and report specific data elements throughout key employment activities and milestones. For example, agencies are required to report statistics for internal competitive promotions and new hires, including data for six different milestones in the selection process, including (1) eligible candidates, (2) applicants, (3) qualified applicants, (4) referred applicants, (5) interviewed applicants, and (6) selected applicants.

Collectively, MD-715 data and analysis requirements cover key aspects throughout the entire 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). In addition, MD-715 also requires tracking and analysis of data from other sources of information, such as the results of organizational climate surveys, exit surveys, EEO complaints, harassment allegations, and grievances.

A fundamental requirement of MD-715 is to capture, maintain, analyze, and report demographic data for employees and applicants, specifically including race, national origin, sex, and disability

status. *Employee* demographic data comes primarily from self-identification; however, if an employee does *not* self-identify their *race/national origin*, the agency is obligated to choose one on their behalf and notify them of the designation chosen by the agency.⁴⁶ If an employee does not self-identify their *disability status*, their status defaults to “I have no disability or serious health condition.” *Applicant* demographic data comes only from self-identification. If an *applicant* does not self-identify demographic data, those data fields simply remain blank.

MD-715 requires agencies to assess demographic statistics using combinations of one race/national origin, plus either Male or Female, resulting in fourteen different race/national origin/sex groups that must be analyzed (e.g., Asian Female, White Male). The race/national origin groups are derived from Office of Management and Budget (OMB) Standards for the Classification of Federal Data on Race and Ethnicity⁴⁷ and associated OPM Data Standards. The standards include five selectable⁴⁸ race categories and one national origin category, and limit sex to either Male or Female. In lieu of using the full plain-language group names in tables and figures with limited space, GSA sometimes uses shorter, two-character abbreviations.

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

Full Demographic Group Title	Abbrev.
Hispanic or Latino Male	HM
Hispanic or Latino Female	HF
White Male	WM
White Female	WF
Black or African American Male	BM
Black or African American Female	BF
Asian Male	AM
Asian Female	AF
American Indian or Alaska Native (AIAN) Male	IM
American Indian or Alaska Native (AIAN) Female	IF
Native Hawaiian or Other Pacific Islander (NHOPI) Male	NM
Native Hawaiian or Other Pacific Islander (NHOPI) Female	NF
Two or More Races Male	2M
Two or More Races Female	2F

Analyses of demographic data compare agency statistics to relevant benchmarks (specified by the EEOC). Significant differences between actual agency rates and their relevant benchmarks

⁴⁶ See 29 CFR § 1614.601(b) EEO group statistics.

⁴⁷ Current standards are at: https://obamawhitehouse.archives.gov/omb/fedreg_1997standards and planned revisions are discussed at <https://www.federalregister.gov/documents/2016/09/30/2016-23672/standards-for-maintaining-collecting-and-presenting-federal-data-on-race-and-ethnicity>.

⁴⁸ The Two or More Races category is not selectable, and is instead based on OMB/OPM business rules, which depend on which of the race categories have been self-identified by employees or applicants.

are flagged as *potential* indicators of *possible* discriminatory barriers. Achieving parity with race, national origin, and/or sex benchmarks is neither an agency goal nor an intended outcome.⁴⁹

Benchmarks come in the form of percentages. Before agency demographics can be compared to their respective benchmarks, they must also be converted into percentages, called “participation rates.” *Participation rates* are derived from agency *population* data.

Population Data:

The overall population sizes of race/national origin/sex demographic groups within GSA vary significantly. The single largest demographic group is White Male, followed by White Female, Black or African American Female, then Black or African American Male. Relatively speaking, those four groups can be considered “large.” The four next-largest groups (Hispanic or Latino Male, Hispanic or Latino Female, Asian Male, and Asian Female) are relatively “medium” sized. By comparison, all of the remaining demographics groups (Native Hawaiian or Other Pacific Islander, American Indian or Alaska Native, and Two or More Races) are much smaller.

TABLE 10: FY23 Populations and Participation Rates of Race/National Origin/Sex Groups

FY23	HM	HF	WM	WF	BM	BF	AM	AF	NM	NF	IM	IF	2M	2F
Population	529	474	4252	2884	1312	1972	516	456	20	17	60	42	105	103
Participation Rate (%)	4.15	3.72	33.37	22.63	10.30	15.48	4.05	3.58	0.16	0.13	0.47	0.33	0.82	0.81

Participation Rates:

Participation rates are calculated by dividing the individual populations of demographic groups *within a particular larger group* (e.g., a Service or Staff Office, grade level, occupational series, or the whole agency) by the total population of the larger group. For example, there are 516 Asian Males in the GSA, and the GSA has a total population of 12,742 employees, so dividing 516 by 12,742 yields a participation rate for Asian Males of 4.05%.

⁴⁹ MD-715, 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.”

MD-715 Instructions state “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 (i.e., failure to accommodate or lack of career development opportunities).”

In addition to the race/national origin/sex categories, MD-715 also analyzes sixteen different disability categories (also derived from the OPM Data Standards), including employee and applicant classifications relating to (1) each of the twelve individual targeted disabilities (i.e., PWTD), (2) all disabilities or serious health conditions (*including targeted disabilities*) (i.e., PWD), (3) cases where individuals self-identify that they do not wish to identify their disability, and (4) instances when employees or applicants either (a) do not self-identify⁵⁰ (i.e., leave their forms blank) or (b) self-identify that they do not have a disability.

TABLE 11: FY23 Populations and Participation Rates of PWD, PWTD & Disability-Related Groups

	OPM Code	Population	Participation Rate
People With Targeted Disabilities (PWTD)	(See Below)	477	3.74
Developmental Disability	02	16	0.13
Traumatic Brain Injury	03	43	0.34
Deaf or Serious Difficulty Hearing	19	106	0.83
Blind or Serious Difficulty Seeing	20	51	0.40
Missing Extremities	31	9	0.07
Significant Mobility Impairment	40	30	0.24
Partial or Complete Paralysis	60	19	0.15
Epilepsy or Other Seizure Disorders	82	18	0.14
Intellectual Disability	90	5	0.04
Significant Psychiatric Disorder	91	174	1.37
Dwarfism	92	1	0.01
Significant Disfigurement	93	5	0.04
People With Disabilities (PWD)	02-03, 06-99	3138	24.63
Do Not Wish to Identify	01	410	3.22
No Disability (or did not self-identify)	05	9194	72.16

Unlike race/national origin/sex groups (for which there are no numerical goals or diversity-related targets), there are numerical goals for both PWD and PWTD participation. Federal goals⁵¹ require agencies to commit to ensuring that no less than 12% of employees are PWD and 2% are PWTD, both at the GS-10 level and below, and at the GS-11 level and above. In FY22, GSA established its own participation goals of 18% for PWD and 3% for PWTD, a standard that is 50% higher than the corresponding Federal goals.

⁵⁰ If an individual does not self-identify a particular OPM disability code (i.e., leaves the OPM Standard Form 256 blank), their disability status defaults to “I have no disability or serious health condition.”

⁵¹ See 29 CFR § 1614.203(d)(7)(i)

The fundamental purpose of MD-715 workforce analyses is to identify triggers by systematically identifying and quantifying disparities between demographic data and relevant benchmarks.

When disparities are identified, further investigations are required to:

1. Validate the findings (i.e., to determine if the disparities were created by inaccurate or incomplete data, unrefined benchmarks, or other reasons related to the analysis itself)
2. Determine *why* the demographic disparities exist (i.e., to identify their root causes)
3. Determine *if* any identified root causes are barriers to equal employment opportunity

After triggers have been identified and validated, and root cause analyses have identified a barrier, further investigations must then be conducted to determine if the barrier is *job-related and consistent with business necessity*.⁵² If a barrier is job-related, it is assessed to determine if circumstances can be modified, to mitigate the barrier so that it will have a less discriminatory impact. If a barrier is found to be not job-related and consistent with business necessity, it must be eliminated. No actions are taken solely to address demographic disparities or to “improve diversity,” ***except through modification or elimination of underlying causal barrier(s)***.

Limitations of Benchmarking:

FY23 analyses use both internal and external benchmarks specified by the EEOC. *Internal benchmarks* include demographics of various workforce groups (e.g., services and staff offices, grade levels, occupational series) and demographics of relevant workforce feeder pools⁵³ associated with key employment lifecycle events (e.g., promotions, awards, performance ratings, separations). Internal benchmarks for PWD and PWTD include GSA goals and agency-wide participation rates. *External benchmarks* include specific baselines derived from Census data (e.g., the National Civilian Labor Force (NCLF), occupation-specific CLFs (OCLFs), and regional CLFs), as well as specified Federal goals for participation of PWD and/or PWTD.

⁵² 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 administrative position to be able to proficiently use a firearm would constitute an unnecessary barrier. In the case of individuals with disabilities, the agency must also conduct further analysis to determine if the applicant or employee can satisfy the qualification standard, test, or selection criterion with reasonable accommodation.

⁵³ Feeder pools are the populations which are eligible for particular employment opportunities. For example, selections to merit promotions are made from a feeder pool consisting of individuals who applied, were found eligible, were qualified, and were referred. The feeder pool would *not* include anyone who did not apply, nor would it include applicants who were found ineligible, unqualified, or who were not referred.

The results of benchmarking must also be validated, as both workforce rates and benchmarks may have shortfalls that make them incomplete, inaccurate, and/or irrelevant comparators.

- Census benchmarks often have limited relevance, due to critical and unquantifiable differences between the occupations, education levels, geographic distributions, etc. of the National Civilian Labor Force and employees in the corresponding GSA workforce.
 - In this workforce analysis, when benchmarks are derived from Census data, the approximate nature of those Census baselines is emphasized by depicting the baselines using both (1) a dashed red line (to show the mathematically-derived benchmarks) and (2) a broader swath of red. This is to remind the reader that the Census benchmarks are only estimates, and that further investigations may be required, before conclusions can be reached.
- In addition to the issues associated with Census benchmarks, many analyses are negatively impacted by inaccurate or incomplete employee and/or applicant self-identification. For example, only approximately 70% of FY23 applicants self-identified their race or ethnicity and fewer than 5% self-identified their disability status. Employee demographic statistics also have known issues. While missing data is readily visible, and internally inconsistent data can often be readily identified, not all known issues can be quantified (e.g., an indeterminate number of employees are known to inaccurately be designated as White, and evidence strongly suggests that disproportionate numbers of employees in several different groups have not self-identified any disability status).
- Missing or unavailable data also impacts effective demographic analysis. For example:
 - GSA does not identify, capture, maintain, or analyze data on which applicants were *interviewed* for internal competitive promotions or new hires, preventing access to the most relevant feeder pool against which to benchmark selections.
 - In assessing career development selections, data is only available for applicants who have already been approved by their respective supervisors. No data is available for applicants who were denied approval by their first line supervisors.
 - GSA does not maintain information on the use or composition of selection panels, preventing analysis of how use of selection panels and/or how selection panel “diversity” may affect outcomes, including both selection outcomes and both employee and participant perceptions of process integrity.

- Some benchmarks are negatively impacted by subjective applicant inputs *other than self-identified race/national origin/sex/disability status information*. For example, when applicants complete questionnaires that assess their qualifications, some applicants may answer questions more conservatively (thus lowering their relative qualifications), while others may answer the questions more liberally (thus appearing to have higher qualifications than their more conservative peers). Those subjective differences can manifest in the analyzed data and have noteworthy impacts on which applicants are identified as *best qualified*, *well qualified*, or merely *eligible*, and in turn, result in differences in applicant referral rates, benchmarks, and analysis outcomes.

As almost all analyses rely on comparisons between agency figures and relevant benchmarks, if the figures and/or the benchmarks are inaccurate, the results may not be representative of actual conditions. In all cases, further investigation is required to validate initial analyses, before conclusions can be drawn, and corrective actions are taken (if applicable).

Depicting Demographic Disparities:

To simplify analyses and interpretation of results, most comparative results (triggers) are depicted using percentages, relative to their respective relevant benchmarks. Using this methodology, a value of 100% is generally expected (i.e., actual demographic rates are equal to their respective benchmarks⁵⁴). Trigger percentages below 100% signify that actual participation rates are lower than expected, while trigger percentages above 100% indicate that actual participation rates are higher than expected.

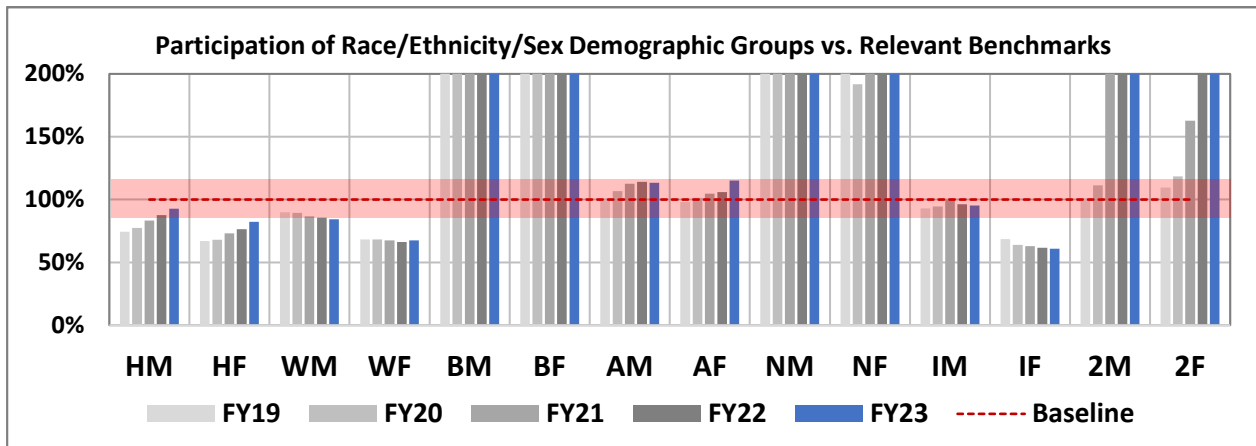
Some analyses assess participation in *desirable* employment outcomes (such as referrals, selections, promotions, hires, awards, etc.). In those cases, lower than expected participation rates (i.e., *trigger rates below 100%*) are *unfavorable*, and therefore, considered to be triggers that should be further investigated. When analyzing undesirable employment events (such as involuntary separations, disciplinary actions, or low performance ratings), the opposite is true, and *higher* than expected rates (i.e., *trigger rates over 100%*) are triggers that should be investigated.

⁵⁴ Per EEOC's Instructions to Federal Agencies for MD-715, Section II.II.A, "variations between actual and expected participation rates based on the benchmarks may be an important clue that further snapshot refinement is needed to determine if something in an agency's policies, procedures, or practices may be artificially limiting the employment opportunities for particular workforce groups. The goal is to uncover evidence of potentially hidden barriers in order to engage in the proactive prevention of discrimination."

Analysis of Overall Agency-wide Demographics:

Agency level participation rates of race/ethnicity/sex groups were compared to relevant⁵⁵ Census benchmarks. Groups with lower-than-expected overall participation rates include Hispanic or Latino Male (HM), Hispanic or Latino Female (HF), White Male (WM), White Female (WF) and American Indian or Alaska Native (AIAN) Female (IF).

FIGURE 5: Overall Participation of GSA Demographic Groups vs. Relevant Census Benchmarks



While participation of employees who identify as AIAN Female is below the respective Census benchmark, there are potentially mitigating circumstances. Until the 2020 decennial Census data is released, agencies are currently required to use the 2014-2018 American Community Survey Census data for external benchmarking; however, that data does not include key multiple race response categories, nor does it correctly reallocate multiple race responses that should be redistributed to the Black or African American, Asian, or AIAN categories (instead of to the Two or More Races category⁵⁶). When the 2020 decennial Census data is released, the rates of all groups are expected to change (due to associated changes in national demographics); however, the benchmarks for Black or African American, Asian, AIAN, and Two or More Races will also be impacted by the redistribution of data associated with participants who selected multiple races.

⁵⁵ FY23 benchmarks were developed from 2014-2018 Census data, modified using EEOC data aggregation rules for Two or More Races groups, then further refined to differentiate between Male and Female rates within each race group, thereby correcting benchmarks for Black or African American, Asian, American Indian or Alaska Native, and Two or More Races demographic groups.

⁵⁶ See EEOC Instructions, Section IV.I.E, “The Two or More races category also does not include people who identify as White and one other type of race. If a person is White and Asian, they would fall under the Asian category. Accordingly, people in the Two or More races category cannot identify as Hispanic, or White and one other race.”

Separate from the 40 female GSA employees categorized as AIAN (i.e., who identify as *only* AIAN), another 40 identify as AIAN, but *in combination with one or more other races*, and are therefore categorized as Two or More Races. Overall, participation of female GSA employees in the Two or More Races category is more than twice the relevant Census benchmark rate. Lastly, another 40 female employees identify as AIAN *in combination with Hispanic or Latino* (and are therefore categorized as Hispanic or Latino only, in keeping with OPM classification guidance).

With regard to overall agency-level five-year demographic *trends*, the most significant triggers are for White Females and White Males, which are the only demographic groups to have both lower than expected participation rates and decreasing trends over the past seven years⁵⁷ (both compared to relevant Census benchmarks, for which White Males and White Females already have decreasing rates). AIAN Females show a similar trend; however, those figures are likely to increase when 2020 Census data becomes available, as OPM and EEOC rules on data aggregation and allocation are expected to reduce the percentage of employees who are currently categorized as Two or More Races and reallocate approximately half of those employees to the AIAN Female and AIAN Male categories.

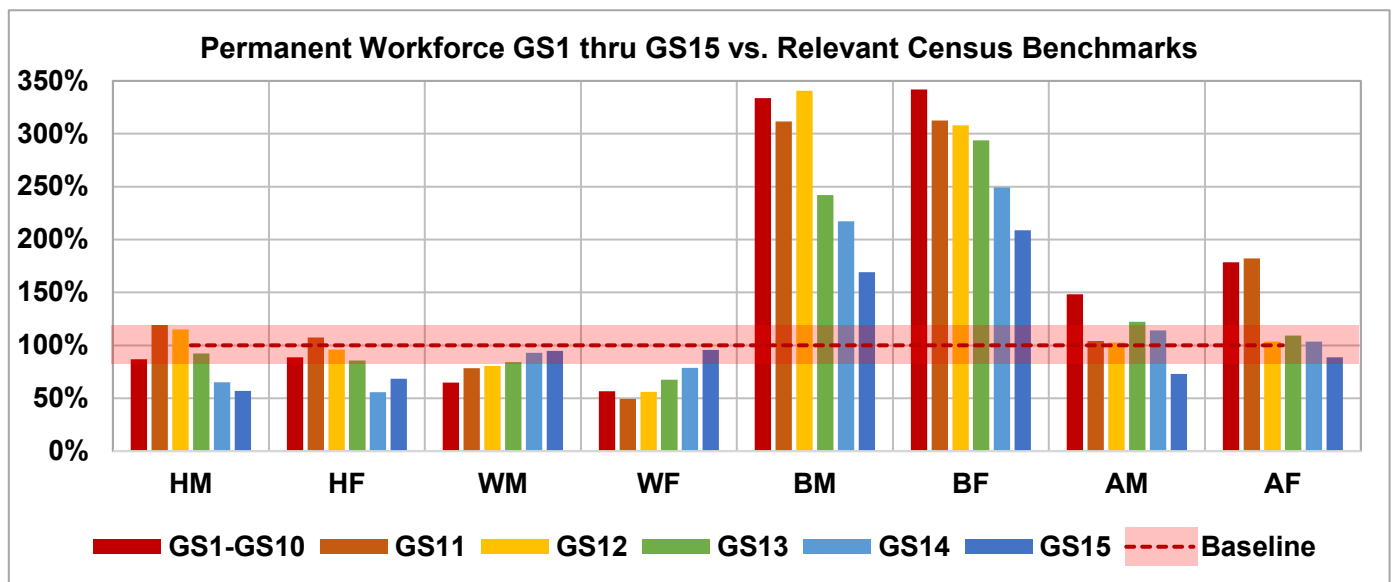
While White Females and White Males have both unfavorable rates and trends relative to Census Benchmarks, Hispanic or Latino Males and Hispanic or Latino Females have unfavorable participation rates, but have experienced significant favorable trends, specifically steady increases in participation over the past five years (up 44% and 35%, respectively). Similarly, Asian Males and Asian Females (both up 17%) have trended upwards, transitioning from slightly lower than expected levels to higher than expected levels. The only other notable change in participation over the past five years is for Black or African American Females, who decreased by 6%; however, that change should be taken in the context that the overall participation rate of Black or African American Females in the agency remains almost three times their expected rate, based on relevant Census benchmarks.

⁵⁷ White Males saw annual decreases in their participation rates every year for the past seven years and White Females saw annual decreases every year from FY17 through FY22; however, in FY23, the White Female participation rate *increased* by 1% (but remains 32% below expected levels).

Race/Ethnicity Analysis of Agency-wide Grade-Level Demographics GS1 thru GS15:

Analysis of grade-level participation rates helps to localize overall disparities by identifying if grade-specific rates are higher or lower than their relevant Census benchmarks. Separately, differences in participation rates from grade level to grade level are also analyzed, with particular focus on differences between high and low grades. Other than White Males and White Females, *all large demographic groups have higher participation in lower grade levels, and experience generally decreasing rates as grade levels increase.* Additional analyses into the potential root causes of these grade-level differences are discussed later in this report.

FIGURE 6: Workforce Participation in Grade Levels vs. Relevant Census Benchmarks



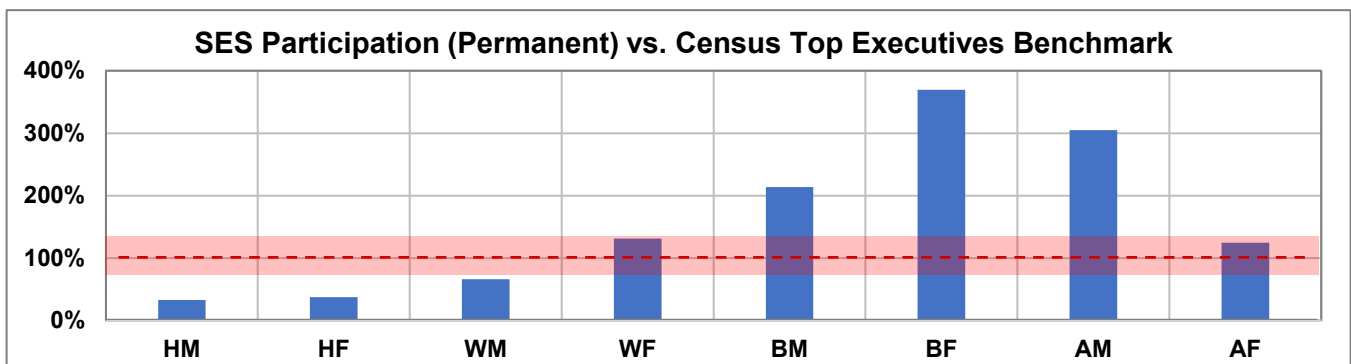
To improve analysis of race, ethnicity, and sex participation for grade levels GS1 thru GS15, *independent Census benchmarks were developed for each GS grade level*, each based on relevant Occupational Civilian Labor Force (OCLF) data for only those occupational series present in each grade level, along with their respective proportions within each grade level. For analysis of race, ethnicity, and sex for SES, the “Top Executives” Census benchmark was used.

Analysis of race/ethnicity demographics in grades GS1 thru GS15 found that:

- White Male and White Female participation rates are lower than expected in all grade levels; however, their participation rates increase with grade level. Separately, data in other categories (e.g., applications, selections, hires, awards, separations, career development) suggests that employment barriers are not a major root cause of the low participation rates of White Males and White Females in grade levels GS1 thru GS15.

- Hispanic or Latino Males only exceed expected participation rates at the GS11 and GS12 grade levels and Hispanic or Latino Females only exceed benchmarks at the GS11 level. Both groups participate in all other grade levels at lower than expected rates, and participation rates for both groups decrease as grade levels increase.
- Black or African American Males and Black or African American Females have significantly higher than expected participation rates in all grade levels, ranging from more than three times the expected rates in grade levels GS1 thru GS12, to more than twice the expected rates in grade levels GS13 and GS14, to a relative “low” of 169% of the expected participation rate for Black or African American Males among GS15s. While participation rates are higher than expected, they also decrease as grade levels increase.
- Asian Male and Asian Female rates are at or above their expected rates in all grade levels except GS15, where they are 73% and 89% of their expected rates, respectively. Their participation rates also generally decrease as grade levels increase.

FIGURE 7: Participation of SES/Equivalentents vs. Relevant Census Benchmarks



Analysis of race/ethnicity demographics among SES and other senior leaders found that:

- Hispanic or Latino Male and Hispanic or Latino Female participation rates are 65% lower than expected and the White Male participation rate is 40% lower than expected.
- White Female and Asian Female participation rates are 30% higher than expected.
- Black or African American Male, Black or African American Female, and Asian Male participation rates are much higher than expected (214%, 369%, and 305%, respectively, compared to their particular benchmarks).

Root cause analysis of the disparities in GS1 thru GS15 participation rates began by exploring grade level distributions within individual series. Among the 20 most populous series, 32% of positions were found to be at the GS14 level or higher. Those series fall into four categories:

- Series with 50% or more of their positions at the GS14 level or higher: Four occupational series (0340, 0905, 2210, and 0301) met this criteria, and were collectively found to have 62% of their collective positions at the GS14 level or higher.
- Series with between 25% and 49.9% of their positions at the GS14 level or higher: Seven occupational series (0201, 0343, 0501, 0511, 0560, 1101, and 1102) met this criteria, and were collectively found to have 29% of their collective positions at GS14 level or higher.
- Series with between 5% and 24.9% of their positions at the GS14 level or higher: Five occupational series (0510, 0801, 0808, 1104, and 1170) met this criteria, and were collectively found to have 20% of their collective positions at GS14 level or higher.
- Series with 5% or fewer of their positions at the GS14 level or higher: Four occupational series (0809, 1176, 1670, and 2150) met this criteria, and were collectively found to have only 3% of their collective positions at the GS14 level or higher.
- Two of the series (0340 and 0905) have the highest proportion of their positions at the GS15 level and one series (2210) has its highest proportion of positions at the GS14 level. Of the remaining seventeen occupations, nine series have their highest respective proportions at the GS13 level and eight have their highest proportions at the GS12 level.
- Notably, the four series with the lowest proportion of positions at the GS14 level or higher each all have their highest proportions of positions at GS12. Furthermore, the proportions of their positions at GS12 are the highest of all series and grade levels. In each case, *more than 50% of their respective positions are at the GS12 level* (i.e., 55% of 1670 positions, 58% of 1176 and 2150 positions, and 77% of 0809 positions are at GS12).
- The analysis concluded that there are inherent limitations to advancement in many of the 20 most populous occupational series. For example, occupational series 1670 (Equipment Services) has no opportunities for advancement beyond GS13, and only 4% of its positions are higher than GS12. Similarly, series 1176 (Building Management) has no opportunities for advancement beyond GS14, and only 5% of its positions are higher than GS13.

TABLE 12: Proportions of Positions in Occupational Series, by Grade Level

Series	GS1-10	GS11	GS12	GS13	GS14	GS15	SES	% at GS14+
0340				3%	2%	50%	45%	97%
0905		2%	3%	15%	31%	38%	5%	74%
2210	6%	4%	6%	20%	33%	31%	1%	65%
0301	4%	3%	14%	27%	27%	24%	1%	51%
0511	7%	3%	7%	43%	29%	9%	2%	40%
0201	4%	2%	25%	37%	27%	5%	0%	32%
1101	4%	3%	21%	41%	24%	8%	0%	32%
0343	6%	6%	24%	34%	24%	6%		31%
0501	16%	6%	24%	25%	20%	8%	2%	29%
1102	4%	5%	32%	32%	20%	6%	0%	26%
0560	2%		47%	25%	17%	8%	0%	26%
0808	6%	1%	27%	42%	22%	1%	1%	24%
1170	5%	4%	39%	29%	19%	4%		23%
0510	8%	18%	13%	40%	15%	5%		20%
0801	5%	0%	38%	41%	11%	4%		15%
1104	13%	14%	41%	21%	9%	3%		12%
1176	7%	9%	58%	22%	5%			5%
2150	8%	15%	58%	14%	3%	1%		4%
0809		5%	77%	19%				0%
1670	2%	39%	55%	4%				0%

	50%+ of positions are at the GS14/15 level
	25% to 49.9% of positions are at the GS14/15 level
	5% to 24.9% of positions are at the GS14/15 level
	<5% of positions are at the GS14/15 level, and most positions are at the GS12 level

Several series were found to be located entirely (or very predominantly) within a single Service or Staff Office (SSO, e.g., 0510 within OCFO; 1176 within PBS; 2150 within FAS). Along with the relative differences in advancement opportunities for each series, this creates situations where individual SSOs may be uniquely affected by series-specific limits to grade-level advancement opportunities.

Conversely, some series were found to have significant numbers of positions in more than one SSO (e.g., 1102 and 1670 positions are present in large numbers in both FAS and PBS, and 2210 positions are in eight different SSOs (though predominantly in GSA IT)). For some series, certain SSOs were found to have higher potential for grade level advancement than other SSOs.

The analysis next combined those findings (*grade level distributions* within each series) with data on *demographic distributions* within each series, then baselined the results to the overall participation rates for each group. The subsequent results identify (1) participation rates for each demographic group within each series (relative to expected levels), along with (2) whether those series are known to have relatively favorable or unfavorable advancement opportunities.

TABLE 13: Group Participation Rates in Occupational Series vs. *Overall Participation Rates in GSA*

% of Jobs at GS14+	Series	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
50% or Greater	0340	16%	88%	134%	113%	64%	64%	114%	92%	37%	70%
	0905	65%	43%	127%	162%	16%	52%	66%	105%	33%	0%
	2210	95%	62%	107%	91%	79%	61%	251%	212%	78%	90%
	0301	90%	112%	94%	125%	75%	100%	90%	100%	103%	100%
25% to 50%	0511	90%	100%	87%	103%	73%	79%	208%	313%	46%	75%
	0201	44%	182%	31%	116%	66%	263%	11%	89%	143%	90%
	1101	132%	92%	117%	102%	97%	71%	77%	83%	92%	67%
	0343	50%	130%	75%	123%	72%	149%	90%	117%	102%	129%
	0501	114%	94%	66%	131%	74%	125%	141%	168%	89%	101%
	1102	81%	126%	73%	112%	111%	146%	71%	91%	106%	80%
	0560	30%	122%	46%	119%	76%	216%	92%	115%	69%	77%
5% to 25%	0808	35%	196%	144%	81%	64%	19%	234%	163%	47%	58%
	1170	93%	147%	95%	109%	118%	92%	55%	107%	83%	92%
	0510	43%	80%	98%	144%	40%	115%	88%	116%	103%	111%
	0801	211%	97%	136%	50%	105%	33%	255%	58%	36%	14%
	1104	174%	73%	73%	48%	140%	151%	111%	227%	143%	48%
5% or Fewer	1176	176%	77%	128%	55%	160%	81%	52%	34%	132%	74%
	2150	174%	90%	149%	65%	114%	41%	69%	16%	174%	134%
	0809	213%	38%	194%	27%	126%	3%	23%	65%	149%	112%
	1670	328%	0%	128%	12%	350%	4%	67%	0%	157%	164%

Favorable <i>high</i> participation in series with <i>high</i> advancement opportunity	Unfavorable <i>low</i> participation in series with <i>high</i> advancement opportunity	Unfavorable <i>high</i> participation in series with <i>low</i> advancement opportunity	Neutral <i>low</i> participation in series with <i>low</i> advancement opportunity
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- Notably, White Females have high participation rates in ten of the eleven occupational series with the highest proportions of positions in grade level GS14 and higher. In contrast, Black or African American Males have *low* participation rates in ten of the eleven series with the highest proportions of positions in grade level GS14 and higher, and Hispanic or Latino Males have low rates in nine of the eleven occupational series.
- Black or African American Males and Hispanic or Latino Males were also found to have relatively *high* participation rates in the six series (of the twenty analyzed) that have the *lowest* proportions of high grade level positions. Collectively, those six series have 74% of their positions in *grade level GS12 or lower*, but only 5.2% of their positions in grade level GS14 or higher. In contrast, White Females have low participation in those series.

This analysis suggests that, in combination, (1) *significant differences in participation rates of demographic groups within occupational series* and (2) *inherent limitations of advancement opportunities within those occupational series* are likely major proximal root causes of many data-related disparities and anecdotal triggers associated with advancement opportunities.

The previous analysis suggests that one contributing root cause of *overarching grade level disparities* might be *differences in participation rates within major series*. Thus, the next logical steps are to (1) look for other potential root causes for those overarching grade level disparities and (2) to investigate to determine the root causes of the differences in participation rates within major series. Analysis of appointment authorities was undertaken to serve both purposes.

Of the many appointment authorities⁵⁸ used by the GSA, thirteen account for 90% of FY22 and FY23 appointments. The grade-level distribution of employees appointed under the eight most-used authorities (comprising 80% of FY22/FY23 appointments) were identified and analyzed.

TABLE 14: Proportions of Each Grade Level Appointed by Each FY22/FY23 Authority

Authority	GS1-10	GS11	GS12	GS13	GS14	GS15	Total
AYM	0.61%	12.70%	30.06%	29.44%	39.37%	72.34%	23%
KTM	2.66%	9.21%	17.31%	22.04%	15.35%	4.26%	12%
BWA	8.61%	20.63%	18.84%	9.81%	3.54%	2.84%	11%
KVM	2.87%	9.21%	13.43%	13.33%	17.32%	6.38%	10%
ZLM	12.70%	9.21%	3.32%	13.33%	10.24%	6.38%	8%
YEB	40.16%	0.95%	0.00%	0.00%	0.00%	0.00%	7%
WUM	6.97%	9.52%	5.82%	2.41%	3.94%	1.42%	5%
LAL	10.66%	17.78%	0.00%	0.00%	0.00%	0.00%	4%

- The most widely-used appointment authority (OPM code AYM⁵⁹) accounts for 23% of all FY22/FY23 hires (and roughly 17% of GSA employees). AYM is a direct hire authority.
 - Proportional use of the AYM authority generally increases with grade level (e.g., accounting for 29% of GS13, 39% of GS14, and 72% of GS15 appointments).
 - Notably, while direct hire authorities offer significant benefits to the agency, by expediting the process of hiring qualified candidates, *direct hiring authorities also have less complete applicant flow data* than other methods, negatively impacting the availability of critical data needed to conduct effective root cause analyses.
 - Authorities YEB and LAL are used entirely for grades GS11 and below.

⁵⁸ OPM codes are at <https://dw.opm.gov/datastandards/referenceData/caa/1428/current?=1&=2&index=C>.

⁵⁹ See 5 CFR § 337.201. OPM will permit an agency with delegated examining authority under 5 U.S.C. 1104(a)(2) to use direct-hire authority under 5 U.S.C. 3304(a)(3) for a permanent or non-permanent position or group of positions in the competitive service at GS15 (or equivalent) and below, if OPM determines that there is either a severe shortage of candidates or a critical hiring need for such positions.

- The WUM authority (Schedule A(u) excepted service authority for persons with intellectual disabilities, severe physical disabilities, or psychiatric disabilities) is used predominantly for lower grade levels.

Next, the demographics of employees hired under each appointment authority were compiled and analyzed, to identify potential correlations between authorities and group demographics.

TABLE 15: Demographic Outcomes of Top GSA Appointment Authorities of FY22/FY23 vs. Demographics of All FY22/FY23 Appointees

Appt Auth	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD	% of Total
AYM	75%	124%	82%	110%	77%	130%	118%	128%	66%	74%	23%
KTM	141%	137%	97%	94%	102%	95%	87%	76%	118%	64%	12%
BWA	120%	116%	120%	80%	125%	73%	64%	74%	67%	74%	11%
KVM	112%	94%	116%	87%	123%	91%	75%	47%	106%	80%	10%
ZLM	25%	70%	94%	162%	53%	113%	89%	83%	77%	79%	8%
YEB	150%	136%	97%	94%	75%	70%	145%	179%	78%	98%	7%
WUM	71%	52%	101%	112%	121%	117%	68%	48%	287%	393%	5%
LAL	52%	42%	72%	78%	101%	95%	268%	348%	56%	66%	4%
ZBA	192%	29%	153%	29%	191%	37%	57%	0%	187%	114%	3%
KQM	28%	34%	88%	135%	121%	144%	34%	0%	104%	108%	2%
LZM	244%	49%	133%	58%	130%	95%	48%	0%	287%	347%	2%
KXM	89%	0%	146%	74%	118%	70%	53%	100%	116%	127%	2%
YEA	89%	54%	92%	85%	142%	70%	159%	100%	34%	42%	2%

- Use of AYM in FY22/FY23 yielded lower than expected rates of Hispanic or Latino Males and White Males, as well as lower than expected rates of Black or African American Males, PWD, and PWTD.
- In combination, the next two most-used authorities (KTM⁶⁰ and BWA⁶¹) together account for roughly the same number of FY22/FY23 appointments as AYM.
 - Notably, for all race/national origin/sex groups (except Hispanic or Latino Females), *the participation rates for AYM and the combination of KTM/BWA are almost “mirror images”* (i.e., for each demographic group for which AYM is high,

⁶⁰ See 5 CFR § 315.501. An agency may appoint by transfer to a competitive service position, without a break in service of a single workday, a current career or career-conditional employee of another agency

⁶¹ See 5 USC § 1104. The delegated examining authority is an authority OPM delegates to agencies to fill competitive civil service jobs through a competitive process open to all U.S. citizens, including current Federal employees.

KTM/BWA are low, and for each group for which AYM is low, KTM/BWA are high). As a result, the collective demographic outcomes of those three top authorities (comprising 46% of FY22/FY23 hires) largely cancel each other out.

- One area for potential future analysis is the use of appointment authority ZLM.⁶² While only accounting for 8% of FY22/FY23 appointments, outcomes of that authority show particularly significant differences between the participation rates of White Females and those of Hispanic or Latino Males and Black or African American Males (groups which are most illustrative of current data disparities).

Further analysis of appointment authorities and grade levels determined that *appointment authorities generally span many grade levels* (with exception of a few authorities used solely for lower-grade positions). For example, although authority AYM was used for 72% of all appointments to the GS15 grade, only 16% of AYM appointments were at the GS15 level, and the majority of AYM appointments were to either GS12 or GS13.

TABLE 16: Distribution of Grade Levels Appointed Under Each Appointment Authority

Authority	GS1-10	GS11	GS12	GS13	GS14	GS15
AYM	0.48%	6.44%	34.94%	25.60%	16.10%	16.43%
KTM	3.93%	8.76%	37.76%	35.95%	11.78%	1.81%
BWA	13.59%	21.04%	44.01%	17.15%	2.91%	1.29%
KVM	5.28%	10.94%	36.60%	27.17%	16.60%	3.40%
ZLM	27.93%	13.06%	10.81%	32.43%	11.71%	4.05%
YEB	98.49%	1.51%	0.00%	0.00%	0.00%	0.00%
WUM	25.95%	22.90%	32.06%	9.92%	7.63%	1.53%
LAL	48.15%	51.85%	0.00%	0.00%	0.00%	0.00%
ZBA	14.10%	17.95%	39.74%	19.23%	7.69%	1.28%
KQM	7.58%	9.09%	39.39%	24.24%	12.12%	7.58%
LZM	13.04%	15.22%	19.57%	30.43%	15.22%	6.52%
KXM	19.05%	16.67%	35.71%	16.67%	11.90%	0.00%
YEA	100%	0.00%	0.00%	0.00%	0.00%	0.00%

⁶² According to OPM, “ZLM is a generic catch-all code to describe any number of legal authorities based on statute, Executive Order, or regulation” however, it is difficult to “conduct analysis beyond overall usage because [Enterprise Human Resources Integration] EHRI data is not programmed to capture information on the specific underlying authorities agencies use.” See OPM Special Study of the Excepted Service at <https://chcoc.gov/sites/default/files/OPM%20Special%20Study%20%E2%80%93%20Excepted%20Service%20Hiring%20Authorities.pdf>.

In combination, the offsetting demographic outcomes of authorities AYM vs. KTM/BYA and the broad use of most authorities across many grade levels suggest that *appointment authorities are not a major root cause of current data triggers*; however, the lack of applicant flow data related to direct hires prevents effective root cause analysis and is a reported Part G deficiency.

Analysis of employee demographics by appointment year provides insights into the current GSA workforce, as well as changes that will likely occur as current employees separate from GSA.

TABLE 17: Demographics of Current GSA Employees, by Appointment Year (*green/red shading denotes higher/lower rates, respectively, compared to current overall GSA rates*)

Appt Year	HM	HF	WM	WF	BM	BF	AM	AF
FY23	5.16%	4.54%	30.22%	24.25%	9.14%	12.69%	3.98%	4.60%
FY22	5.22%	4.33%	32.10%	18.74%	11.85%	14.94%	5.57%	5.04%
FY21	5.18%	4.38%	32.54%	21.38%	11.55%	13.28%	5.44%	2.79%
FY20	5.47%	2.34%	35.29%	20.44%	12.24%	13.41%	4.95%	3.65%
FY15-19	4.89%	3.16%	36.78%	21.51%	11.13%	12.59%	4.14%	2.92%
FY10-14	3.53%	3.19%	37.33%	21.81%	10.66%	13.92%	4.71%	2.84%
FY00-09	3.51%	3.72%	35.29%	24.59%	8.04%	14.92%	3.79%	4.18%
FY90-99	2.45%	5.01%	27.16%	26.73%	9.80%	22.47%	1.81%	2.98%
FY80-89	1.23%	3.15%	22.47%	21.10%	12.74%	32.88%	1.78%	2.05%
FY70-79	0.00%	0.00%	8.33%	33.33%	16.67%	33.33%	0.00%	0.00%
GSA FY23	4.15%	3.72%	33.37%	22.63%	10.30%	15.48%	4.05%	3.58%

- During FY23, higher proportions of appointments of Hispanic or Latino Males, Hispanic or Latino Females, White Females, and Asian Females correspond to increases in the participation rates of those groups, while White Males and Black or African American Males and Black or African American Females all had decreasing rates.
- Recognizing that employees appointed prior to 1980 are more likely to be retirement eligible, the agency can expect to see future changes in overall demographics, based on the demographics of groups appointed in those early years. For example, Black or African American Female appointment rates from FY00 thru FY23 have been lower than the current workforce rate (15.48%), resulting in a relative “low intake” situation (and therefore decreasing rates); however, because the proportions of Black or African American Females appointed on or before 1989 are far higher than the current overall GS rate, the separation of those employees will also lead to a “high outflow” situation, leading to an even more rapid decrease in the participation rates of Black or African American Females.

Applicant Demographic Analysis:

MD-715 requires agencies to conduct separate analyses of (a) internal competitive promotions and (b) external new hires. In both cases, agencies must first designate ten “*mission critical occupations*” (MCOs⁶³), then develop, analyze, and report specific statistics for those series. Collectively, the ten MCOs used for FY23 MD-715 analyses account for 76% of all employees.

TABLE 18: Mission-Critical Occupations

Series	Series Title	Population	Percent of Workforce
1102	Contracting	2187	17.2%
1101	General Business and Industry	1917	15.0%
0343	Management and Program Analysis	1259	9.9%
0301	Miscellaneous Administration and Program	1159	9.1%
2210	Information Technology Management	1025	8.0%
1176	Building Management	906	7.1%
1170	Realty	502	3.9%
0501	Financial Administration and Program	304	2.4%
0560	Budget Analysis	243	1.9%
0201	Human Resources Management	218	1.7%
		9,720	76.3%

Participation rates of demographic groups within individual MCOs were benchmarked against the Occupational Civilian Labor Force (OCLF) benchmarks for corresponding Census occupations.⁶⁴ Demographic group participation rates and trends vary by group and by MCO; however, as the MCOs represent a large percentage of the workforce, taken in aggregate, the demographic profiles of the ten MCOs are similar to the overall agency demographic profiles.

With some series-specific exceptions, the MCOs *collectively* have lower than expected overall participation of Hispanic or Latino Males, Hispanic or Latino Females, White Males, and White Females; much higher than expected participation of Black or African American Males and Black or African American Females; and somewhat higher than expected aggregate rates of Asian Males and Asian Females (i.e., similar to the overall GSA demographic profiles).

⁶³ Mission-critical occupations are defined as heavily populated occupations that are mission-related and have strong career advancement potential.

⁶⁴ Many OPM Occupational Series correspond to a single, unique Census Occupation Code (e.g., OPM series 2210 corresponds to Census Occupation Code 0110); however, many other OPM series share the *same* corresponding Census occupation (e.g., GSA has eighteen OPM series (including mission-critical occupations 0301 and 1101) that all correspond to Census occupation 0750). The sharing of Census codes among multiple OPM series is one reason that Census benchmarks are not ideal comparators.

TABLE 19: Participation Rates of Demographic Groups in Mission-Critical Occupations, vs. Occupational Civilian Labor Force (for Race/National Origin Sex) or Federal PWD/PWTD Goals

Series	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
1102	78%	100%	66%	65%	333%	422%	138%	123%	218%	149%
1101	127%	62%	121%	64%	233%	145%	83%	75%	190%	126%
0343	58%	174%	55%	89%	201%	539%	89%	123%	209%	242%
0301	86%	75%	98%	78%	182%	204%	97%	90%	212%	187%
2210	88%	138%	66%	95%	215%	356%	139%	281%	160%	168%
1176	128%	44%	117%	34%	434%	228%	98%	66%	270%	138%
1170	91%	101%	91%	56%	503%	414%	109%	156%	160%	172%
0501	122%	73%	51%	91%	237%	365%	230%	235%	182%	190%
0560	40%	81%	56%	71%	166%	288%	149%	75%	141%	145%
0201	39%	101%	37%	61%	196%	558%	22%	119%	294%	204%

- Hispanic or Latino Male participation rates exceed OCLF benchmarks by 20% or more for only three occupations (1101, 1176, and 0501), but are more than 20% below the OCLF benchmarks for four series (1102, 0343, 0560, and 0201).
- Hispanic or Latino Female participation rates significantly exceed expectations only for 0343 and 2210, but are well below expectations for 1101, 0301, 1176, and 0501.
- White Male participation rates exceed expectations only for 1101 and 1176, but are more than 20% below expectations for 1102, 0343, 2210, 0501, 0560, and 0201.
- White Female participation rates do not exceed expectations for *any* MCO, and are more than 20% below expectations for all MCOs except 0343, 2210, and 0501.
- Black or African American Male participation rates significantly exceed their OCLF benchmarks in every MCO (by an average of 170%).
- Black or African American Female participation rates significantly exceed their OCLF benchmarks in every MCO (by an average of 252%).
- Asian Male rates significantly exceed expectations for 1102, 2210, 0501, and 0560, but are somewhat below expectations for 1101 and notably below expectations for 0201.
- Asian Female participation rates exceed expectations in six of the MCOs (especially 2210, 1170, and 0501), but are more than 20% below expectations for 1107, 1176, and 0560.

New Hires Analysis:

Analyses of new hires use data on OCLFs, applicants, qualified applicants, referred applicants, interviewed⁶⁵ applicants, and selected applicants. Participation rates of demographic groups were benchmarked against their respective demographics at the previous sequential milestone (i.e., demographics of *applicants* are compared to *OCLF benchmarks* for that series, *qualified applicants* are benchmarked against *applicants*, and *referred applicants* are compared to *qualified applicants*). GSA does not have complete data on interviewed applicants, so selected applicants' demographics were benchmarked against the demographics of referred applicants. For example, among new hires to the 2210 series, White Females comprised 9% of *referred* applicants and 21% of *selected* applicants, resulting in a trigger rate of $21\% \div 9\% = 234\%$.

TABLE 20: Selection Rates for New Hires to Mission Critical Occupations vs. Referral Rates

Series	HM	HF	WM	WF	BM	BF	AM	AF
0201	0%	0%	149%	223%	33%	88%	0%	0%
0301	48%	109%	110%	171%	85%	74%	107%	153%
0343	58%	194%	65%	115%	39%	124%	150%	325%
0501	219%	0%	81%	118%	92%	99%	73%	0%
0560	0%	0%	142%	191%	0%	122%	0%	0%
1101	117%	191%	85%	144%	86%	70%	72%	256%
1102	75%	67%	118%	180%	58%	73%	100%	137%
1170	118%	0%	69%	236%	87%	150%	0%	0%
1176	97%	91%	106%	141%	113%	117%	27%	0%
2210	88%	258%	82%	234%	53%	95%	78%	187%
Overall	102%	111%	106%	165%	78%	78%	64%	118%

- Most notably, the selection rates of White Females exceeded their proportions within the referred applicant pools for *every* MCO (and often by a significant amount). Aggregating the new hire selections for all ten MCOs, White Females were selected at 165% the expected rate, comprising 22% of selections compared to 13.5% of all referrals.
- In contrast, all other demographic groups had lower than expected selection rates for many (if not most) MCOs. The overall selection rates of Asian Males, Black or African American Males, and Black or African American Females were lower than expected.

⁶⁵ GSA does not consistently compile or report data on interviewed applicants. That shortfall is an identified Part G deficiency that is being corrected.

- Selection rates for Hispanic or Latino Males were significantly lower than expected in five of the ten MCOs, including two MCOs for which there were zero Hispanic or Latino Males selected (and for which White Female selection rates were twice the expected rate).
- Selection rates for Hispanic or Latino Females were also significantly lower than expected in five of the ten MCOs, including four MCOs for which there were zero Hispanic or Latino Females selected. For three of those four MCOs, White Female selection rates were twice the expected rate).
- Selection rates for Black or African American Males were notably lower than expected overall, as well as in five of the ten MCOs, including one MCO for which there were zero Black or African American Males selected (and for which the White Female selection rate was twice the expected rate). The selection rate for Black or African American Males only exceeded expectations for one MCO (1176 – Building Management), and then only by 13% above their referral rate.
- Selection rates for Black or African American Females were notably lower than expected overall and in three MCOs, and were higher in three other MCOs.
- Selection rates for Asian Males were significantly lower than expected in seven of the ten MCOs, including three MCOs for which there were zero Asian Males selected. Overall, Asian Males had the lowest selection rate of all groups.
- Selection rates for Asian Females were significantly higher than expected for five MCOs and there were zero Asian Female selections for the other five MCOs.
- Notably, among new hires to the 2210 series, Hispanic or Latino Females, White Females, and Asian Females had significantly higher than expected rates and Black or African American Females had a selection rate slightly below expectation; however, all Female groups had higher selection rates than Males within their respective race/national origin groups.

The most significant findings relating to the analyses of new hires were the significantly higher than expected selection rates for White Females to all MCOs and the varying low overall and/or MCO-specific selection rates for the other demographic groups. Collectively, new hires to the ten MCOs included 96,000 applicants, of whom 33,000 were referred, and 869 were selected.

Internal Competitive Promotions Analysis:

Analysis of internal competitive promotions to the ten MCOs used the same methodology as with new hires; however, on a much smaller scale. A total of 2,200 applicants, of whom 1,400 were referred, yielded 391 selections. The same benchmarks were used as for new hires, except that, instead of OCLFs, internal applicants benchmarked against “relevant applicant pools” for each series. Benchmarks for qualified applicants, referred applicants, interviewed applicants, and the selected applicants categories remain the same. In many cases, there were no internal applications from particular demographic groups to certain occupational series. In those cases, selection rate triggers are not applicable, as there were no referred applicants.

TABLE 21: Selection Rates for Internal Competitive Promotions to Mission Critical Occupations vs. Referral Rates

Series	HM	HF	WM	WF	BM	BF	AM	AF
0201	N/A	N/A	N/A	N/A	0%	200%	N/A	N/A
0301	41%	247%	100%	103%	104%	123%	33%	135%
0343	70%	62%	93%	172%	47%	70%	119%	155%
0501	200%	0%	150%	100%	67%	80%	0%	N/A
0560	N/A	0%	180%	154%	120%	0%	0%	N/A
1101	91%	182%	114%	123%	40%	63%	52%	121%
1102	61%	115%	69%	117%	77%	111%	231%	123%
1170	80%	133%	100%	133%	160%	44%	0%	0%
1176	53%	167%	122%	29%	84%	65%	73%	293%
2210	63%	N/A	194%	168%	32%	56%	101%	0%
Overall	73%	131%	107%	126%	61%	83%	88%	118%

- Most notably, the selection rates of White Females exceeded their proportions within the referred applicant pools for nine of ten MCO. Interestingly, the exception is series 1176, for which White Females had the highest *new hire* selection rate of all groups.
- Also notable were the relatively high selection rates for Hispanic or Latino Females and Asian Females, each to five MCOs (with zero or low selection rates in the other five). White Males also had high selection rates to five MCOs (and a low rate only to 1102); however, overall White Male selection rates were only slightly higher than expected.
- The remaining groups each had isolated instances of high selection rates to one or two MCOs, and notably low selection rates to all other MCOs.

- Aggregating the internal competitive selections for all ten MCOs, Hispanic or Latino Females, White Females, and Asian Females had overall selection rates notably higher than expected, while Hispanic or Latino Males and Black or African American Males both had overall selection rates notably lower than expected.

Collectively, the analysis of selection rates to new hires and internal competitive promotions found consistently (and sometimes significantly) high rates of selection for White Females (with the only exception being internal competitive promotions to series 1176), as well as high rates for Hispanic or Latino Females and Asian Females, each for particular MCOs, and both offset by lower than expected rates for the other MCOs. Also notable were the consistently low overall selection rates for Black or African American Males, Black or African American Females, and Asian Males. With respect to selection rate disparities, differences between White Females and Black or African Males are the most illustrative example.

To determine potential root causes for those disparities, analyses were then conducted to look for possible correlations (or their absence) between selection rates and performance ratings.

Performance Rating Analysis:

Analyses of performance ratings continued systematic barrier investigations of selection rates and Quality Step Increase triggers identified in FY22 and FY23, and focused on performance rating data for the FY21 and FY22 reporting cycles. Performance ratings of specific applicants and selectees was not possible, both because applicant flow data masks personally identifiable information and because applicant and employee data are managed in independent systems. Instead, the analyses assessed all available performance ratings agency-wide, by grade level, by key SSO groups, and by occupational series, then narrowed the focus to the most recent (FY22) performance rating cycle. Subsequent analyses then explored possible performance rating outcomes as a factor of the race/national origin and sex of immediate supervisors.

Six different performance rating levels were assessed (from “1” (the lowest rating) up to “5” (the highest rating)). Results were then baselined against the agency-wide averages for each rating level, with further breakdowns by grade level, SSO, and series. Based on the results of those initial findings, deeper analyses were then conducted into the distribution of “5” ratings.⁶⁶ Analyses into other rating levels were ongoing at the end of FY23 and will be reported in FY24.

⁶⁶ Other rating levels were analyzed; however; 5 ratings were a focus area, due to their overall proportions among ratings, key anomalies identified during the initial analysis, their status as an outlier (i.e., there are no higher ratings), and their indirect connection with FY22 and FY23 Quality Step Increase triggers.

Within each demographic group, the proportions of employees who received “5” ratings were compared to their overall group proportions. For example, if members of a demographic group comprised 10% of an occupational series, but received 15% of the “5” ratings for that series, their trigger rate would be calculated to be 150% (i.e., 15% ÷ 10% = 150%), or 50% higher than expected. Individual analyses were conducted for the ten MCOs, all other occupational series (as one consolidated group), key SSO groupings, and GS grade levels from GS9 to GS15.

TABLE 22: Distribution of “5” Ratings, *Relative to Group Proportions in Series, Grades, and SSOs*

FY22 Rating 5	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Overall	78%	92%	103%	134%	65%	81%	89%	111%	82%	79%
1102	67%	94%	115%	129%	67%	81%	83%	97%	83%	84%
1101	86%	103%	97%	128%	68%	87%	101%	115%	75%	56%
0343	94%	86%	107%	134%	65%	72%	87%	104%	83%	77%
0301	71%	90%	112%	115%	88%	73%	90%	79%	92%	86%
2210	74%	56%	94%	137%	81%	98%	82%	118%	76%	91%
1170	48%	80%	98%	148%	64%	78%	88%	135%	68%	69%
0560	0%	148%	149%	115%	114%	72%	145%	33%	86%	109%
0501	102%	68%	121%	148%	48%	34%	23%	155%	84%	77%
0201	106%	88%	91%	146%	96%	75%	212%	177%	80%	47%
1176	93%	111%	112%	123%	63%	67%	118%	178%	102%	120%
All Other Series	91%	69%	111%	127%	54%	83%	91%	119%	90%	90%
PBS	83%	99%	102%	136%	62%	80%	100%	123%	78%	83%
FAS	81%	86%	105%	130%	68%	81%	79%	97%	81%	78%
GSA IT	46%	57%	106%	127%	78%	56%	110%	180%	80%	114%
All Other SSOs	62%	91%	118%	127%	70%	79%	82%	100%	88%	61%
GS15	101%	114%	94%	111%	98%	94%	111%	91%	94%	95%
GS14	80%	86%	100%	117%	73%	96%	82%	101%	89%	91%
GS13	93%	118%	97%	127%	77%	82%	86%	129%	100%	70%
GS12	85%	111%	103%	143%	64%	85%	67%	139%	100%	127%
GS11	89%	109%	99%	211%	48%	53%	151%	109%	108%	201%
GS9-GS10	0%	72%	82%	295%	34%	88%	135%	0%	122%	288%

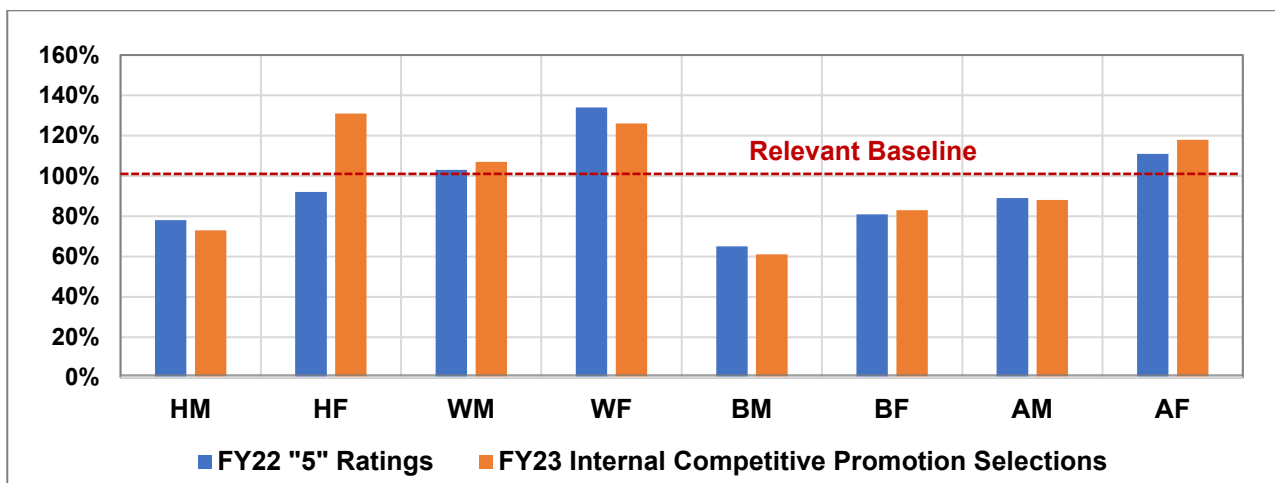
Most notably, the overall rates that each demographic group received level “5” ratings were found to correlate generally with many employment outcomes for those respective groups (both favorable and unfavorable).

The analysis only assessed *aggregate* outcomes for the various groups, and did not analyze individual employee ratings or make any attempt to correlate between the actual performance and performance ratings of any specific employees.

- White Females had the highest overall proportions of “5” ratings of any demographic group. Although their proportions differed within each series, SSO, and grade level, *in every case*, the proportion of White Females who received “5” ratings was higher than the overall proportion of White Females in the corresponding series, SSO, or grade level. For example, White Females comprised 30.4% of GS15s, but received 33.7% of GS15 “5” ratings (111%), whereas White Females were only 14.7% of GS11s, but those GS11 White Females received 31% of the “5” ratings for that grade level group (211%).
- Black or African American Males had the lowest overall proportions of “5” ratings of any demographic group (65%), only exceeding their workforce proportions in one category (series 0560 – Budget Analysis).
- Hispanic or Latino Males had the second-lowest overall proportions of “5” ratings of any group (78%).
- Black or African American Females had the third-lowest proportions of “5” ratings of any race/national origin/sex group (81%). Black or African American Females were also the only demographic group to have lower proportions of “5” ratings in every series, SSO, and grade level category analyzed.

Ultimately, the overall rates that each demographic group received level “5” ratings in FY22 were found to correlate quite closely with internal competitive promotion selection rates from FY23 (except for Hispanic or Latino Females).

FIGURE 23: Distribution of FY22 “5” Ratings (vs. Workforce Proportions) and Selection Rates to FY23 Internal Competitive Promotions (vs. Referred Applicant Pools)



After reviewing the initial findings of the analysis of performance ratings, a concern was raised, based on perceptions that White Females might have received a higher proportion of “5” ratings because their respective immediate supervisors and/or higher-level managers were perceived to be disproportionately White Female.

As a result of that input, further analyses were conducted, focusing on potential correlations between (1) the race/national origin (RNO) and sex of immediate supervisors and/or higher-level managers and (2) the performance ratings of their respective subordinate employees.

TABLE 24: Distribution of “5” Ratings to Employee Race, National Origin, and Sex Groups vs. Supervisor Race, National Origin, and Sex

		Employee RNO/Sex							
		HM	HF	WM	WF	BM	BF	AM	AF
Supervisor RNO/Sex	HM	82%	141%	97%	165%	41%	79%	152%	113%
	HF	70%	122%	88%	131%	91%	97%	77%	138%
	WM	84%	93%	98%	134%	66%	80%	85%	111%
	WF	73%	73%	106%	126%	66%	76%	78%	92%
	BM	92%	89%	105%	149%	66%	88%	156%	186%
	BF	61%	95%	115%	132%	85%	89%	72%	80%
	AM	120%	108%	105%	171%	20%	68%	97%	139%
	AF	80%	133%	106%	125%	30%	80%	78%	114%

The analysis of aggregated supervisor-related outcomes resulted in many notable findings.

- Supervisors from all race, national origin, and sex groups were found to have awarded higher proportions of level “5” ratings to White Females (relative to the proportions of White Females among their respective subordinates).
- Supervisors from all race, national origin, and sex groups were found to have awarded lower proportions of “5” ratings to both Black or African American Males and Black or African American Females (relative to their respective proportions among subordinates).
- Except for Asian Males, all supervisor race, national origin, and sex groups also recorded lower aggregate proportions of “5” ratings for Hispanic or Latino Males.
- Of all supervisor groups Asian Females *and* White Females awarded the lowest proportions of level “5” ratings to their respective White Females subordinates.

One very noteworthy finding that stemmed from the analysis of supervisor race, national origin, and sex vs. employee race, national origin, and sex was a determination that *every supervisor (race, national origin, and sex) demographic group supervises a higher proportion of their own demographic group*, compared to the GSA average. For example, Black or African American Males comprise only 10.6% of the workforce; however, Black or African American Males comprise 22.3% of subordinate employees of Black or African American Male supervisors (i.e., Black or African American supervisors supervise 211% as many Black or African American Male employees as expected).

That pattern continues not only across every supervisor race, national origin, and sex group, but also across race or national origin groups (without regard for sex). For example, Asian Males also supervise a disproportionate number of Asian Females, and vice versa.

TABLE 25: Proportions of *Employee Race, National Origin, and Sex Groups* under each *Supervisor Race, National Origin, and Sex Group*, compared to GSA Average

		Employee RNO/Sex							
		HM	HF	WM	WF	BM	BF	AM	AF
Supervisor RNO/Sex	HM	188%	140%	116%	72%	110%	65%	80%	75%
	HF	241%	160%	82%	92%	88%	88%	111%	190%
	WM	103%	83%	122%	99%	86%	68%	105%	85%
	WF	77%	96%	95%	130%	72%	91%	105%	118%
	BM	106%	107%	75%	64%	211%	140%	78%	70%
	BF	72%	101%	60%	85%	140%	207%	47%	69%
	AM	115%	171%	101%	71%	87%	84%	216%	122%
	AF	82%	133%	85%	97%	56%	89%	200%	286%

The findings of this analysis raise further triggers, including:

- The possibility that the root cause(s) of the disproportionate demographic distribution of employees (i.e., supervisors directly supervising higher proportions of their own race/national origin/sex groups) might be a result of bias in recruitment and/or hiring.
- The possibility that having demographic groups disproportionately represented within certain organizational groups might correlate to disparate access to and/or eligibility for certain employment opportunities (e.g., telework, career development, Quality Step Increases) for those demographics groups, based on inherent “structural” limitations of the organizational group, if any (e.g., series 1670 has no positions at GS14 or higher).

Analysis of Participation Rates of PWD and PWTD⁶⁷

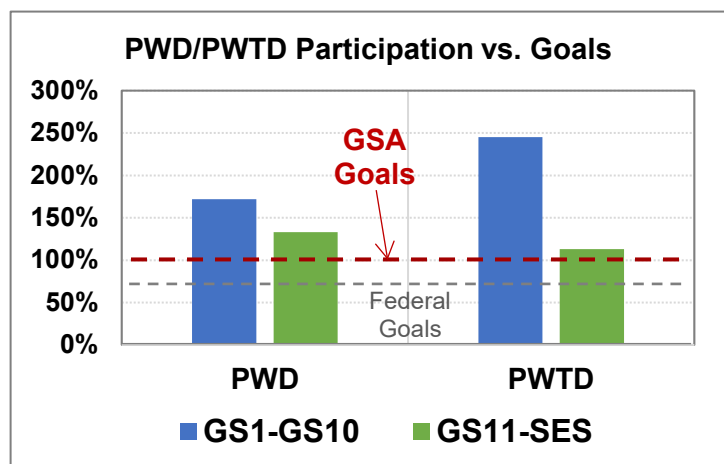
Analyses of grade-specific participation rates of PWD and PWTD benchmarked against GSA's PWD and PWTD participation goals (18% and 3%, respectively), as well as corresponding Federal goals⁶⁸ (12% and 2%, respectively).

Including both new hires and FY23 separations, GSA had a total of 1,991 employees (15.6%) during FY23 who self-identified a disability, plus an additional 1,403 employees (11%) who did *not* self-identify a disability, but who could be classified as PWD by using data from other relevant sources.⁶⁹ Manual reclassification of those employees was performed to enable accurate calculations⁷⁰ of PWD and PWTD participation rates within EEOC's GS1-GS10 and GS11-SES tiers; however, the reclassification did not modify any official disability status data within the system of record.

In FY23, 3,138 employees (24.63%) either self-identified or were manually classified as PWD, and 477 employees (3.74%) self-identified as PWTD.

Within the GS1-GS10 tier, 30.93% of employees were PWD and 7.36% were PWTD. Within the GS11-SES tier, 23.98% of employees were PWD and 3.39% were PWTD. Rates in both tiers exceeded Federal and agency goals.

FIGURE 8: PWD & PWTD Participation in Low and High Grade Level Tiers vs. Federal & Agency Goals



⁶⁷ 29 C.F.R. § 1614.203(d)(6)(i) requires agencies to perform a workforce analysis annually to determine the percentage of employees at each grade and salary level who have disabilities and targeted disabilities.

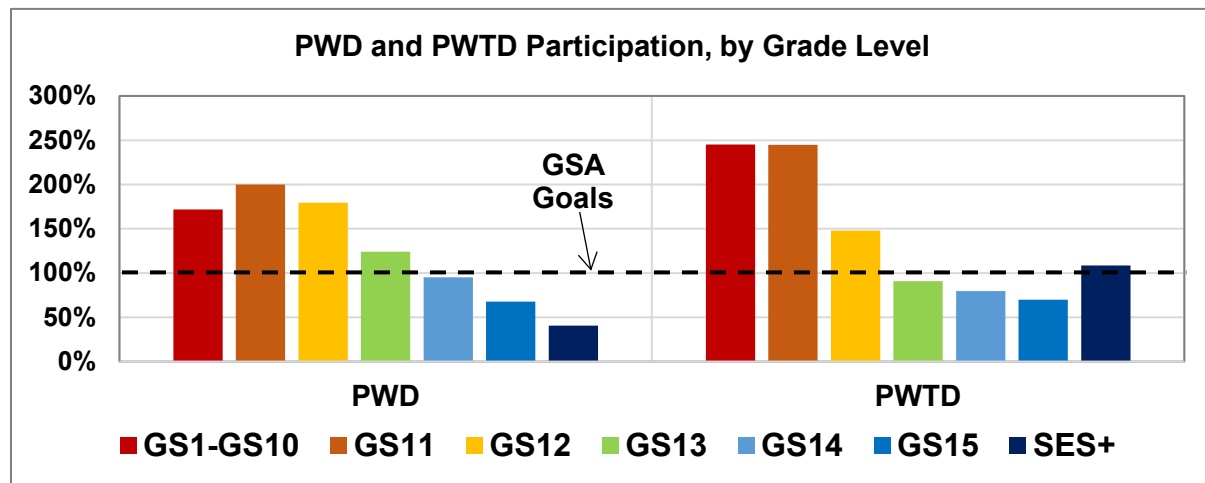
⁶⁸ 29 C.F.R. § 1614.203(d)(7)(i) requires agencies to adopt plans that commit to having no less than 12% PWD in both a high grade tier (GS11 and higher) and a low grade tier (GS10 and below), as well as no less than 2% PWTD in both a high grade tier (GS11 and higher) and a low grade tier (GS10 and below).

⁶⁹ C.F.R. § 1614.203(d)(6)(ii) permits agencies to classify employees as PWD or PWTD, on the basis of employee records relating to their appointments under appointment authorities that take disability into account and on the basis of records of requests for disability-related reasonable accommodations.

⁷⁰ 29 C.F.R. § 1614.203(d)(6)(iii) requires agencies to take steps to ensure that the data collected pursuant to the annual PWD and PWTD analyses is accurate.

In addition to analyzing participation relative to the EEOC grade level tiers, additional analyses were conducted within individual grade levels (even though there are no Federal goals for specific grades, other than the two grade-level tiers). As with race/national origin groups (other than White), both PWD and PWTD show higher participation (i.e., greater representation) within the lower grade levels, with generally decreasing participation as grade levels increase; however, in the case of decreasing PWD and PWTD participation, it is believed that a major contributing factor is low self-identification of disabilities by employees in high grades.

FIGURE 9: PWD & PWTD Participation by Grade Level vs. Agency Goals



Accurate analysis of disability status is complicated by (1) the limitations of the employee data system of record, (2) a lack of OPM guidance on implementing C.F.R. § 1614.203(d)(6)(ii) regulations regarding classification of PWD, and (3) low rates of employee self-identification.

- Self-identification of a disability is voluntary; however, the data system of record *must* include a disability status for every employee, so when an employee chooses to not self-identify, their status defaults to “I do not have a disability” (Disability Code 05). Critically, Code 05 is also the default when employees leave their forms blank for any reason (including simply because completing the form is voluntary).
- Disability Code 05 can also be self-identified (i.e., when employees do not have a disability). One problem that arises is that *Code 05s of employees who did self-identify are indistinguishable from the Code 05s of employees who did not*, making it impossible for the agency to (1) quantify those two groups, (2) analyze and potentially address the reasons and concerns of individuals who did not self-identify, or (3) conduct targeted self-identification campaigns focused on individuals who did not self-identify.

- Analysis of workforce data by appointment authorities that take disability into account found 10,042 employees (79%) who have Disability Code 05 (either self-identified or designated by the agency) and 846 employees (7%) who self-identified using Disability Code 01 (“I do not wish to identify”); however, of those 10,888 total employees, 1,286 (13%) can be classified with certainty as PWD using other relevant data elements. Discounting the 846 who have self-identified that do *not* wish to identify their disability, this means that there are 440 employees who have a disability, but who are inaccurately coded as having no disability.

TABLE 26: Disability Status by Appointment Authorities That Take Disability Into Account

Appointment Authorities	I do not have a disability	I do not wish to identify	Self-Identified PWD	Unreported PWD	
Schedule A(u)	2	34	201	36	15%
Converted Sched A(u)	12	22	166	34	17%
30% or More DV	77	48	75	125	63%
VRA	37	7	17	23	38%
VEOA	366	53	104	158	30%
Other Authorities	9548	682	1290	910	8%
Total	10042	846	1853	1286	10%

- One significant issue relates to Schedule A(u) employees and employees who were appointed under Schedule A(u), but who have since been converted to the competitive service. According to OPM policy, if an employee is appointed under the Schedule A(u) authority, they must either furnish an accurate disability code, or if they fail to disclose their disability, agencies are to determine the appropriate code from existing employee records or medical documentation submitted upon appointment.⁷¹ Currently, there are 36 unconverted Schedule A(u) employees and 34 converted Schedule A(u) appointees who do not have accurate disability codes.
- Another significant finding relates to 30% or More Disabled Veterans. Of the 200 employees with Appointment Authority Codes related to 30% or More Disabled Veterans, only 75 employees (37.5%) have self-identified a disability. This raises concerns that the other 125 30% or More Disabled Veterans may have concerns about self-identification and/or may not be aware that self-identified Disability Status Codes

⁷¹ See Privacy Act Statement, OPM Standard Form 265 at https://www.opm.gov/forms/pdf_fill/sf256.pdf.

are independent from their Veterans Affairs disability rating. A total of 77 30% or More Disabled Veterans are coded with Disability Status Code 05.

- Among employees appointed under the VRA or VEOA authorities, 121 are coded under Disability Status Code 05, but are known to have a disability.
- Aside from the 1,286 employees *known* to have unreported disabilities, there are several other groups that are *suspected* of having high rates of unreported disabilities (based on comparisons with external benchmarks⁷² or internal peer groups, or on other relevant factors). Those groups include 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 lastly, employees with Veterans Preference Code 3.⁷³ Collectively, these groups are believed to be likely to include between 1000 and 1500 employees with unreported disabilities (some of whom overlap with those identified during the analysis of appointment authorities).
- Independent of employee self-identification and disability status codes maintained in the employee data system of record, *applicants for employment* (including current 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 when an applicant chooses to not self-identify, that field is simply left 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). As a result, in the case of applicant flow data, the percentage of applicants who choose to leave their self-identification forms blank *can* be quantified. For the past several years, fewer than 10% of applicants have chosen to self-identify their disability status during the application process, including current employees applying for other GSA positions. In FY23, only 4.7% of applicants identified their disability status.

⁷² See United States Census Bureau 2021 American Community Survey Disability Characteristics at <https://data.census.gov/table?q=disability>.

⁷³ Veterans Preference Code 3 denotes a veteran entitled to 10-point preference either due to a service-connected disability or who is a recipient of the Purple Heart, but who is not rated as having a compensable disability of 10 percent or more.

Career Development Opportunities Analysis:

Analyses of career development opportunities assessed data from two primary sources:

- Fifteen agency-wide “Competitive Development Programs” (CDPs) that provide leadership development opportunities via recognized *external* programs that focus on leadership competencies required for current and future leaders (e.g., Harvard Kennedy School, White House Leadership Development Program, Partnership in Public Service, OPM President’s Management Council, College of Information and Cyberspace - National Defense University, eCornell, and Graduate School USA).
- Internal training programs, including 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.

Depending on the availability of data for each career development program, the investigations identified and analyzed rates of eligibility determinations, applications, nominations, supervisor approvals, and selections. Data from those independent systems was then combined with key demographic and organizational data from the employee data system of record (e.g., grade level, supervisory status), yielding notable findings related to career development opportunities.

TABLE 27: Selection Rates to Competitive Development Programs, Details, and Temporary Promotions, relative to Application/Nomination Rates

	HM	HF	WM	WF	BM	BF	AM	AF
GS13-SES CDPs	133%	80%	102%	118%	80%	66%	114%	159%
Details	102%	83%	162%	117%	64%	63%	0%	183%
Temp Promos	132%	99%	105%	115%	89%	56%	148%	297%

- Selection rates to the three major programs (e.g., CDPs, details, and temporary promotions) were similar to those of new hires and to internal competitive promotions.
- Hispanic or Latino Males, White Males, White Females, and Asian Females had higher than expected selection rates to all three programs (each relative to their respective proportions within the eligible/approved applicant pools for each program opportunity).
- Black or African American Males and Black or African Females had lower than expected selection rates to all three programs (relative to their proportions within applicant pools).
- Hispanic or Latino Female CDP and detail selection rates were lower than expected.

In the case of details, additional data was available that indicated which applicants had been “procedurally disapproved,” not by their supervisors, but because the *applicants* did not follow stated procedures (i.e., they applied to opportunities for which they lacked advertised prerequisite qualifications, such as being at a particular grade level or in a particular geographic region, and/or when they had not previously performed the duties required of the temporary opportunity). Because the advertised prerequisites provide relatively objective criteria, “procedural disapproval” rates may provide a means of assessing aspects of performance and for identifying potential application-related barriers unique to particular groups.

TABLE 28: Procedural Disapproval Rates for Detail Opportunities by Demographic Groups vs. Overall Workforce Participation Rates

	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Disapproved	153%	289%	89%	54%	95%	115%	147%	182%	113%	117%

Analysis of procedural disapprovals (related to applications to detail opportunities) found that:

- Hispanic or Latino Females had a much higher proportion of applications disapproved because the applicants did not fulfill the advertised application requirements.
- Hispanic or Latino Males, Asian Males, and Asian Females also had notably higher than expected rates of procedural disapprovals.
- Black or African American Females and Persons with Disabilities and Targeted Disabilities all had slightly higher than expected rates of procedural disapprovals.
- White Females had significantly lower than expected rates of procedural disapprovals.

Analysis of procedural disapprovals included analyses focusing on (1) *application*-centric events (including multiple applications by the same employee) and separate analyses using (2) *applicant*-centric statistics. The applicant-centric analyses accounted for applicants with multiple disapprovals, so that repeated errors by a handful of individual applicants would not skew the resultant findings.

While not directly related, the FY23 procedural disapprovals of applications to details provided insights similar to a previous analysis of *ineligibility determinations* associated with FY19 thru FY21 merit promotion selections to high grades, albeit with some different outcomes. Specifically, that analysis found relatively high (i.e., unfavorable) rates of ineligibility for Black or African American Males and Hispanic or Latino Males, and notably lower relative rates of ineligibility for Asian Females, White Females, and Asian Males.

TABLE 29: Ineligibility Rates for FY19-FY21 Selections to GS13 thru GS15 Merit Promotions

	HM	HF	WM	WF	BM	BF	AM	AF
Ineligible for GS13	111%	103%	106%	84%	112%	100%	102%	81%
Ineligible for GS14	120%	107%	101%	88%	107%	102%	86%	89%
Ineligible for GS15	105%	115%	113%	90%	114%	117%	73%	73%

These are potentially significant findings, as both processes used relatively objective, non-discriminatory criteria, and in both situations, Hispanic or Latino employees were found to have had higher than expected rates of disapproval or ineligibility in the early stages of those competitive processes.

Awards and Recognition Analysis:

Analyses of award and recognition focused on time-off awards, cash awards, Quality Step Increases (QSIs), and Performance-based Pay Increases.⁷⁴ In general, awards are heavily influenced by employee performance ratings and grade levels, yielding results that mirror trends in those areas. Additionally, because employees may elect time-off awards in lieu of cash awards, rates in those areas are influenced in part by personal choice, complicating trend analysis and effective trigger identification.

TABLE 30: Award Rates for Demographic Groups, Relative to Respective Overall Workforce Rates

Award Type	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Time-Off Awards: 1 - 10 hours	109%	71%	91%	128%	71%	103%	106%	90%	122%	147%
Time-Off Awards: 11 - 20 hours	86%	111%	98%	127%	46%	91%	111%	140%	85%	58%
Time-Off Awards: 21 - 30 hours	92%	101%	89%	138%	55%	117%	64%	92%	75%	70%
Time-Off Awards: 31 - 40 hours	60%	66%	97%	189%	24%	32%	63%	145%	72%	69%
Time-Off Awards: 41+ hours	101%	114%	99%	142%	52%	68%	92%	131%	114%	106%
Cash Awards: \$501 - \$999	119%	68%	112%	92%	99%	103%	81%	74%	71%	76%
Cash Awards: \$1000 - \$1999	117%	104%	96%	82%	147%	112%	86%	59%	127%	131%
Cash Awards: \$2000 - \$2999	96%	97%	99%	82%	114%	122%	108%	86%	81%	83%
Cash Awards: \$3000 - \$3999	92%	75%	114%	96%	98%	96%	96%	66%	87%	90%
Cash Awards: \$4000 - \$4999	103%	97%	109%	117%	78%	80%	110%	96%	72%	56%
Cash Awards: \$5000 or more	54%	58%	112%	130%	63%	81%	94%	120%	44%	53%
Quality Step Increases	63%	115%	94%	147%	75%	78%	132%	76%	54%	48%
Performance-based Pay Increase	51%	28%	135%	122%	30%	47%	239%	122%	30%	116%

⁷⁴ Awards in the QSI category pertain to OPM Nature of Action Code (NOAC) 892. For GS employees, they include “Quality Increases” and for SES, they include “Adjustments” under the broader category within the EEOC Instructions of “Performance-based Pay Increases Provided on Irregular Basis” (NOAC 891).

- Black or African American Males had lower than expected rates in all time-off award categories (the lowest of any group in all categories), notably lower than expected rates for cash awards above \$4000, lower than expected rates of QSIs, and lower than expected rates of performance-based pay increases.
- White Females had higher than expected rates for all time-off awards (the highest of any group for awards over 20 hours), cash awards above \$4000 (the highest of any group), QSIs (the highest of any group), and performance-based pay increases.

Analysis of Career Ladder Progression:

Career ladders allow applicants to enter into positions at grade levels lower than the full performance grade level, then to systematically advance into higher grade levels, up to an established target grade level. Typically, adequately performing employees⁷⁵ in career ladder positions will progress upward at a rate of one applicable grade level each year (e.g., an adequately performing GS-5 employee hired into a GS-5/7/9/11 career ladder position would generally expect to promote to GS-7 after one year, then to GS-9 after one year as a GS-7, etc.). Analysis of employee grade levels, target grade levels, and performance identified 81 career ladder employees who *have not timely progressed in grade level to their respective target grades*. Many of those employees “stalled” in their progression 15 or more years ago.

TABLE 31: Demographics of “Stalled” Career Ladder Positions, vs. Overall GSA Rates

HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
136%	76%	84%	68%	150%	127%	139%	157%	166%	75%

- Hispanic or Latino Males, Black or African American Males, Black or African American Females, Asian Males, Asian Females, and PWD all have disproportionately high participation rates among career ladder employees who have not progressed to their respective target grade levels.
- Hispanic Females, White Males, White Females, and PWTD are all included among employees who have “stalled” in their career ladder advancement; however, their “stalled” rates are all lower than their respective workforce participation rates.

⁷⁵ Per 5 CFR § 335.104, no employee shall receive a career ladder promotion unless his or her current rating of record is “Fully Successful” (level 3) or higher. In addition, no employee may receive a career ladder promotion who has a rating below “Fully Successful” on a critical element that is also critical to performance at the next higher grade of the career ladder.

- Among career ladder employees who have not progressed to their respective target grade levels, several employees were found to have consecutive years of outstanding performance ratings, demonstrating that the lack of advancement, at least in those cases, is not related to employee performance.

Disciplinary Action Analysis:

Rates of disciplinary actions were assessed for each demographic group. Analyses were benchmarked against the participation rates within the overall GSA workforce and each grade level. Additional analyses were then conducted into related involuntary separations of PWD and employees hired under the Schedule A(u) appointment authority for persons with severe physical disabilities, intellectual disabilities, or psychiatric disabilities. Further analyses then explored potential correlations between disciplinary actions, performance ratings, and requests for disability-related reasonable accommodations, as well as the race/national origin and sex of Deciding Officials related to the disciplinary actions.

TABLE 32: Disciplinary Actions vs. Group Proportions in Each Category, Grade, & SSO

	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Events (incl. "Frequent Flyers")	109%	62%	95%	61%	224%	127%	70%	22%	134%	229%
Removals	0%	181%	111%	113%	119%	80%	0%	0%	218%	364%
Reprimands	73%	83%	110%	51%	190%	127%	140%	0%	112%	416%
Suspensions	94%	0%	98%	33%	176%	236%	0%	0%	81%	0%
Terminations During Probation	232%	0%	80%	41%	259%	145%	111%	0%	218%	397%
Warning Notice	131%	74%	83%	81%	317%	65%	63%	0%	112%	75%
GS4 to GS9	142%	0%	90%	142%	165%	90%	193%	0%	153%	245%
GS11	0%	0%	106%	99%	181%	155%	0%	0%	45%	0%
GS12	51%	0%	87%	49%	301%	98%	0%	0%	131%	120%
GS13	211%	171%	110%	55%	138%	117%	45%	63%	74%	335%
GS14	0%	0%	120%	0%	267%	245%	0%	0%	144%	0%
GS15	0%	0%	84%	72%	165%	196%	415%	0%	407%	560%
PBS	122%	76%	84%	50%	277%	109%	40%	0%	152%	271%
FAS	0%	73%	143%	39%	162%	99%	182%	80%	73%	128%
OHRM	0%	0%	0%	119%	0%	191%	0%	0%	245%	302%
OCFO⁷⁶	0%	0%	0%	163%	0%	216%	0%	0%	180%	493%

⁷⁶ Office of Chief Financial Officer

Analysis of 139 disciplinary actions for which race/ethnicity data was available identified disproportionately high rates of disciplinary actions for Black or African American Males.⁷⁷

- Disciplinary actions for Black or African American Males included all categories of disciplinary actions and all grade levels, with concentrations occurring in the Public Building Service (PBS) and Federal Acquisition Service (FAS).
- Black or African American Females also had higher rates of disciplinary actions than other race groups, and across more categories and grade levels.
- PWD and PWTB both had notably high rates of disciplinary actions in many categories and grade levels, as well as across major services and staff offices.
 - Further analysis of PWD identified that five Schedule A(u) hires were disciplined, including three terminated during their probationary status and two removed after their subsequent conversion to the competitive service.
 - No direct or indirect correlations could be made between reasonable accommodations (e.g., timeliness and/or effectiveness) and disciplinary actions affecting PWD.
- Asian Females had, by far, the lowest instances of disciplinary actions of any demographic group in FY23. White Females, Hispanic or Latino Females, and Asian Males also had relatively low rates of disciplinary actions.

Deciding Official data was incomplete; however, compiling the data that was available enabled analysis of the demographic profile of Deciding Officials related to FY23 disciplinary actions.

TABLE 33: Deciding Official for FY23 Disciplinary Actions, by Demographic Group vs. Overall GSA Demographics

HM	HF	WM	WF	BM	BF	AM	AF
116%	79%	126%	119%	35%	104%	67%	28%

⁷⁷ The data behind this table was analyzed, and triggers identified, for each race, national origin, and sex group, including American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, and Two or More Races. For this table only, several disciplinary actions associated with Two or More Races Male employees who identify as both Black or African American and American Indian or Alaska Native are accounted for under Black or African American Male (instead of as Two or More Races).

- Most notably, FY23 Deciding Officials were predominantly White Male, White Female, or Hispanic or Latino Male, and disproportionately fewer Deciding Officials were Asian Females, Black or African American Males, or Asian Males. That disparity may fuel perceptions about process integrity, particularly given the percentage of disciplined employees who were Black or African American Males.

EEO Complaints Analysis:

Analysis of EEO complaints⁷⁸ used data from EEOC Form 462⁷⁹ to identify protected bases and issues alleged in complaints filed from FY20 through FY23.⁸⁰ Figures for overall numbers of complaints and complainants were identified relating to bases of either sex or race/national origin. Those figures were benchmarked against GSA-wide demographic group populations, in order to identify “per capita” rates of complainants⁸¹ for each basis. The rates for each basis were then normalized to the overall GSA per capita complainant rates, to support comparisons.

TABLE 34: Per Capita Complainant Rates of Major Race/National Origin Bases vs. Overall GSA Complainant Rate for all Race/National Origin Complaints

	Hispanic	White	Black	Asian
FY20	158%	39%	212%	102%
FY21	292%	9%	274%	0%
FY22	131%	12%	309%	0%
FY23	137%	19%	252%	142%

In FY23, among the four largest race/national origin groups, there were a total of eight complainants who alleged discrimination based on either race or national origin.

- Five of the eight complainants alleged discrimination based on Race – *Black or African American*. For complainants who alleged discrimination based on Race – Black or

⁷⁸ Complaints are not the same as discrimination. Only a fraction of EEO complaints lead to settlements or findings of discrimination; however, all complaints can help gauge perceptions of fairness and inclusion.

⁷⁹ Annual Federal Equal Employment Opportunity Statistical Report of Discrimination Complaints.

⁸⁰ Data captured in the EEOC Form 462 is compiled using different demographic groups than the MD-715 demographic categories. For example, Form 462 captures each basis individually (e.g., sex independent of race or national origin), whereas MD-715 combines employee and applicant demographics into combinations of one race/national origin and one sex (e.g., Asian Male, Hispanic or Latino Female).

⁸¹ The *bases* of EEO complaints are contextually different from claimant *demographics*. A claimant’s race, national origin, sex, and disability status within the system of record (demographics) are independent from bases alleged for discrimination. For example, a complaint made by an Asian complainant is not the same as a complaint asserting discrimination because the complainant is Asian.

African American, the most prevalent issues alleged were Promotion/Non-Selection (33%, up from 10% in FY22 and 18% in FY21) and Non-Sexual Harassment (22%), followed by Discipline (11%) and Reassignment (11%).

- Each of the remaining race or national origin groups had a single complainant and correspondingly lower per capita rates, with White having the lowest per capita rate.

For EEO complaints related to sex, initial trigger analysis used the same methodology as for those relating to race or national origin; however, the populations and per capita rates for Lesbian/Gay/Bisexual/Transgender-related complainants could only be estimated, as OPM currently limits sex/gender data categories to either Male or Female. For the purposes of trigger identification only, the GSA LGBT population was estimated, based on the total number of FY22 and FY23 Federal Employee Viewpoint Survey (FEVS) participants who self-identified as LGBT. Those figures were then extrapolated to estimate overall agency-wide rates, based on the overall FEVS participation rates for those years, and was then further extrapolated, based on overall agency population changes, in order to estimate the overall GSA LGBT populations for FY20 and FY21. While that methodology only produced estimated population figures, the estimates serve as important comparative baselines. Analyses of FEVS results (later in this report) reinforce the importance of having baselines for sex/gender, beyond Male and Female.

TABLE 35: Complainant Rates of Sex/Gender Bases vs. Demographic Group Populations

	Male	Female	LGBT
FY20	78%	128%	83%
FY21	25%	145%	416%
FY22	71%	148%	0%
FY23	25%	114%	623%

In FY23, there were a total of eight complainants who alleged discrimination based on sex.

- Three complainants alleged discrimination based on Sex - *LGBT*. Because of the relatively small population, that represents a per capita rate six time the overall GSA per capita rate of complainants alleging discrimination based on sex.
- Four complainants alleged discrimination based on Sex – *Female* in twelve complaints. The most prevalent issue was Promotion/Non-Selection (36%, up from 5% in FY22).
- One complainant alleged discrimination based on Sex – *Male* in fifteen complaints. The most prevalent issues alleged were Discipline, Non-Sexual Harassment, Performance Evaluation/Appraisal, and Promotion/Non-Selection.

Detailed information on complaints-related statistics can be found in the GSA Office of Civil Rights Library at <https://www.gsa.gov/reference/civil-rights-programs/office-of-civil-rights-library>.

Exit Survey Response Analysis:

FY23 was the first year that exit survey responses were made available, so an effort was made to analyze all prior-year results, including 650 narrative survey responses from 2019 thru 2023. The analyses focused on (1) participant demographics, (2) narrative responses to the GSA Exit Survey question “*Would you recommend GSA as a great place to work?*,” (3) narrative responses to the survey field “*Please tell us why you would or would not recommend GSA as a great place to work*” and (4) narrative responses to the question “*What is the most important thing GSA could do to become a better place to work?*” Quantifiable survey responses were benchmarked against the demographics of all survey participants, as well as the demographics of all separations that occurred during the same period.

Of the 650 exit survey participants, 425 (65%) indicated that they would recommend GSA as a great place to work and 68 (10.5%) responded that they would *not* recommend GSA as a great place to work. The remaining 157 responded by selecting the option “Don’t know/It depends.”

TABLE 36: Exit Survey Response Rates and Response Rates of Demographic Groups to Exit Survey Question “Would you recommend GSA as a great place to work?”

	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Took Survey	83%	109%	94%	129%	67%	103%	115%	99%	97%	109%
Answered "Yes"	117%	76%	103%	94%	112%	99%	108%	89%	98%	93%
Answered "No"	46%	212%	97%	93%	147%	93%	0%	201%	90%	125%

- Hispanic or Latino Males had a low overall survey participation rate, but favorable exit survey responses, including high rates of favorable “Yes” responses and low rates of unfavorable “No” responses, relative to their proportions among all survey participants.
- Hispanic or Latino Females had a high overall survey response rate, but *unfavorable* exit survey responses, including low rates of favorable “Yes” responses and very high rates of unfavorable “No” responses, relative to their proportions among participants.
- White Females had the highest survey participation rate of all demographic groups.
- Black or African American Males had the lowest exit survey participation rate of any demographic group, as well as high rates of unfavorable “No” responses, relative to their proportions among exit survey participants.

- Asian Males had the second highest participation rate of all groups, as well as favorable rates of “Yes” and “No” responses.

Unvalidated, anecdotal narrative survey responses were reviewed for 368 exit surveys covering the period from August 2019 through September 2023, including all negative (“No”) responses and all neutral (“I don’t know/It depends”) responses. Notably, the narratives from all three categories (Yes/No/It Depends) included responses that raised largely the same concerns, of which seven topics dominated. Among the 368 exit surveys with narrative responses that were reviewed, *management/leadership* was the paramount issue (27%), *promotion/advancement* was the next most prevalent (15%), followed by *training and development* (11%), *workload* (10%), *DEIA* (8%), *EEO/harassment* (8%), and *accountability* (6%). The number of instances that those seven topics were mentioned in the exit survey responses were analyzed and categorized by demographic group.

TABLE 37: Exit Survey topics mentioned in GSA Exit Survey responses 2019 thru 2023, by demographic group vs. overall group demographics of survey participants

Topic	% of Surveys	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Management/Leadership	27%	77%	90%	84%	117%	72%	99%	126%	226%	109%	140%
Promotion/Advancement	15%	47%	109%	104%	62%	76%	143%	174%	104%	93%	86%
Training/Development	11%	0%	75%	69%	116%	104%	131%	119%	285%	108%	118%
Workload	10%	67%	0%	98%	153%	54%	55%	83%	74%	123%	0%
DEIA	8%	177%	0%	34%	85%	179%	162%	164%	293%	40%	81%
EEO/Harassment	8%	91%	319%	53%	87%	110%	148%	169%	101%	111%	83%
Accountability	6%	0%	0%	86%	146%	45%	90%	0%	367%	118%	0%

- Management/Leadership was a topic of concern of White Females, Asian Males, and PWD, and especially PWTD and Asian Females.
- Promotion/Advancement was a topic of predominant concern for Black or African American Females and Asian Males.
- Workload was the major concern of White Females and PWD.
- DEIA was the predominant topic of concern for Hispanic or Latino Males, Black or African American Males, and Black or African American Females, and was also a major concern of Asian Males and Asian Females.
- EEO/Harassment was the primary concern of Hispanic or Latino Females and a major concern of Black or African American Females and Asian Males.
- Accountability was a concern for White Females and major concern of Asian Females.

- Many narrative exit survey responses stated that leaders hire and/or promote less qualified applicants, based on considerations unrelated to experience or merit (e.g., personal bias, nepotism).
- Many responses stated that leaders and/or human resources staff purposely use procedures designed to reduce competition or make it difficult for current GSA employees to be selected. Many respondents expressed feelings of bias against hiring or promoting from within GSA.
- Several responses complained generally about a lack of promotion/advancement opportunities and/or specifically about promotion/advancement opportunities being limited for employees located in field offices.
- Some responses alleged discrimination against Black or African American applicants or employees, while others alleged bias against White applicants or employees.

Pulse Survey Response Analysis:

GSA administered Employee Pulse Surveys in November, 2022; March, 2023; and September, 2023. The Pulse Surveys captured participant inputs on more than 50 measures related to working at GSA in a hybrid work environment, including measures of overall satisfaction, the future of work, top employee priorities, types and utilization of on-site services, communications, top reasons for reporting on-site, and top reasons for continuing to work for GSA, as well as benefits and concerns about telework/hybrid work.

Pulse survey results were primarily used to enable employees to share opinions about their respective workforce experiences and to provide GSA leadership with actionable insights on how to make GSA an even better place to work; however, Pulse Survey responses were also analyzed according to participant demographics, in order to identify potential disparities and trends.

Overall participation rates varied for each of the survey offerings, ranging from about 30% to 44% of GSA employees. The most notable findings that were related to survey participation were disparities between participation rates of White and Black or African American employees.

- In one Pulse Survey, participant demographics were categorized by race only (independent of sex). In that Pulse Survey, the participation rate for White employees was 18% higher than expected; however, participation rate for Black or African American employees was 34% lower than expected.

- In another Pulse Survey, participant demographics were analyzed according to the EEOC race/national origin/sex groups. In that survey, the participation rate of White Female employees was 36% higher than expected and the participation rate for Black or African American Males was 45% lower than expected.

Within individual measures, participants were first divided into two categories, based on their respective responses to the question “*Have you reported to work at a GSA facility in the past 60 days?*” Responses for individual demographic groups in each category were then benchmarked against the overall responses of all Pulse Survey participants, and analyzed to identify differences in responses across race, national origin, and/or sex groups. The results are complex and require additional analysis; however, there were several questions for which there were notable differences in responses across demographic groups. For example:

- Participant responses to the question “*What are your top reasons for continuing to work at GSA?*” differed between race/national origin groups (regardless of sex).
 - Hispanic or Latino Males and Hispanic or Latino Females answered “*Senior Leadership (staff/service office’s senior leadership and/or GSA’s senior leadership)*” at the highest rate of all demographics groups.
 - Black or African American Males and Black or African American Females answered “*Learning and Career Development Opportunities*” at the highest rate of all demographic groups, and answered “*My Supervisor*” at the lowest rate of all demographic groups.
- Among participant responses to the question “*What concerns do you have about telework/hybrid work?*”, responses citing “*Poor work-life balance*” as a major concern differed significantly along Male and Female lines (regardless of race or national origin).

TABLE 38: Pulse Survey Responses – Rates of Citing “Poor Work-Life Balance” as Concerns about Telework/Hybrid Work vs. Overall Participant Rate

Demographic Group	Male	Female
Hispanic or Latino	24%	185%
White	82%	116%
Black or African American	79%	155%
Asian	74%	105%

FEVS Analysis:

Two years of FEVS data were analyzed for this report, including 2022 FEVS data that became available in FY23, as well as 2023 FEVS data that became available in January 2024.

Positive and negative perceptions of 2022 FEVS measures were analyzed in five major categories, each benchmarking against respective comparator groups, as well as collectively, baselining against the overall GSA average. The five major categories included:

- National Origin: Hispanic or Latino vs. Non-Hispanic or Latino
- Race: White vs. Black or African American vs. All Other Races
- Gender/Sex: Male vs. Female vs. Straight vs. LGBT
- Disability Status: Persons with Disabilities vs. Participants without Disabilities
- Leadership Level: Non-Supervisors vs. Team Leads vs. Supervisors vs. Managers vs. Senior Leaders

Participation in the 2022 FEVS varied by demographic group.⁸² For most demographic groups, FEVS participation rates could be determined by comparing the maximum number of participants in each FEVS measure⁸³ to the group-specific GSA populations at the end of 2022; however, for some groups, participation rates cannot be accurately calculated, because either GSA lacks workforce comparator data (as is the case for LGBT statistics⁸⁴) or FEVS lacks data on group-specific participation for each measure (as is the case for leadership levels⁸⁵).

⁸² FEVS demographic groups differ from those used by MD-715. For example, FEVS only considers the White and Black or African American races individually, and groups all other races together into an “All Other Races” category. Similarly, FEVS includes LGBT demographics; however, OPM categories for employee and applicant gender/sex do not include non-binary options, and are limited to Male or Female.

⁸³ Not all participants responded to every question, leading to different participation rates in each measure.

⁸⁴ OPM limits gender/sex responses for employee data to either Male or Female; however, FEVS included either three gender/sex categories (Male, Female, and LGBT in 2022) or four (Male, Female, LGB, and Transgender in 2023). As a result, LGBT employees who are limited to Male or Female in the system of record are able to instead identify as LGBT within FEVS, reducing the number of Male or Female responses relative to system of record comparators, thus lowering their apparent participation rate.

⁸⁵ Out of 7227 overall FEVS participants in 2022, a total of 6999 identified their leadership level, including 4590 Non-Supervisors (66%), 638 Team Leaders (9%), 1052 Supervisors (15%), 591 Managers (8%), and 128 Senior Leaders (2%). Note that the labels for the FEVS leadership levels do not align with OPM Supervisor Status Codes or the number of GSA employees in the respective supervisor/manager roles. For example, while 638 FEVS participants identified as Team Leaders, the total number of “Leaders” (Supervisory Status Code 6) and “Team Leaders” (Supervisor Status Code 7) is only 314 employees.

TABLE 39: Group Participation Rates in 2022 FEVS, vs. Total Participants

Group	% Participation
Male	54%
Female	58%
Hispanic or Latino	63%
White	63%
Black or African American	48%
All Other Races	64%
PWD	71%
Non-PWD	61%

TABLE 40: Group Participants in 2022 FEVS (Groups without Comparator Data)

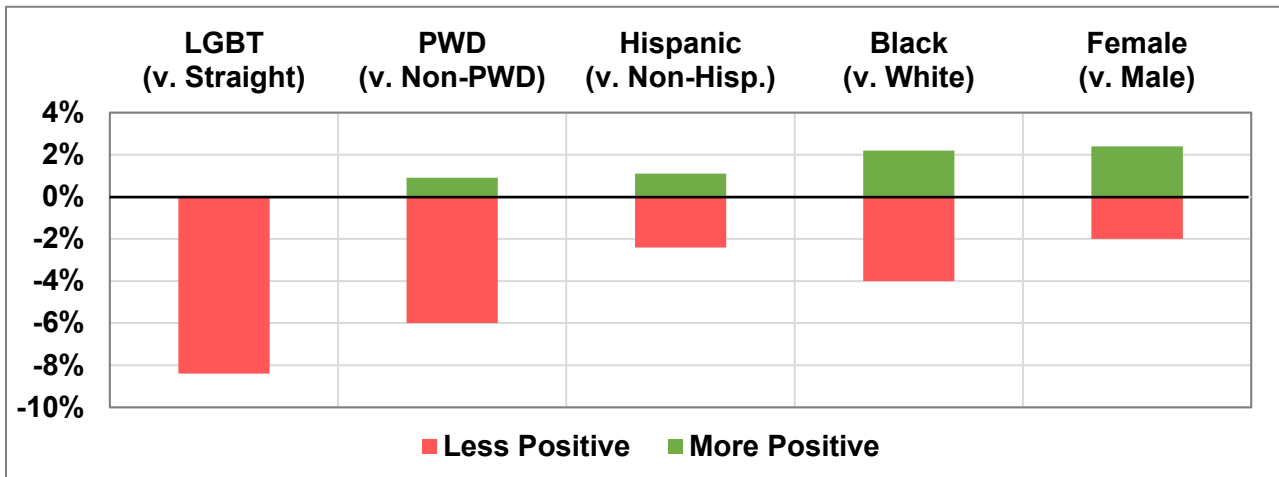
Group	Participants
Straight	6131
LGBT	432
Non-Supervisors	4590
Team Leaders	638
Supervisors	1052
Managers	591
Senior Leaders	128

- Overall, 60% of GSA employees participated in the 2022 FEVS.
- Persons with Disabilities had the highest participation rate of all groups.
- Black or African Americans had the lowest FEVS participation rate of all groups.⁸⁶
- FEVS participation rates of Males and Females are understated (as LGBT participants can identify as LGBT in FEVS, but only as Male or Female in the system of record).
- The 432 employees who identified as LGBT represent 6% of FEVS participants and 3.6% of the FY22 workforce.

Differences in the positive and negative perceptions between key demographic groups and their relevant comparator groups were analyzed, and measures with significant divergences in positive perceptions identified and quantified. In every case, the analyzed groups were found to have more measures that were less positive than their respective comparator groups. Differences in positive perception rates were also compared. Except for Females (compared to Males), *all analyzed demographic groups had lower positive perception rates (in aggregate) than their respective comparator groups.*

⁸⁶ Black or African American employees also had the lowest participation rates (66%) of all demographic groups in at least two of GSA’s FY23 Quarterly Pulse Surveys.

FIGURE 10: Aggregate Positive 2022 FEVS Perceptions of Groups vs. *Comparator Groups*



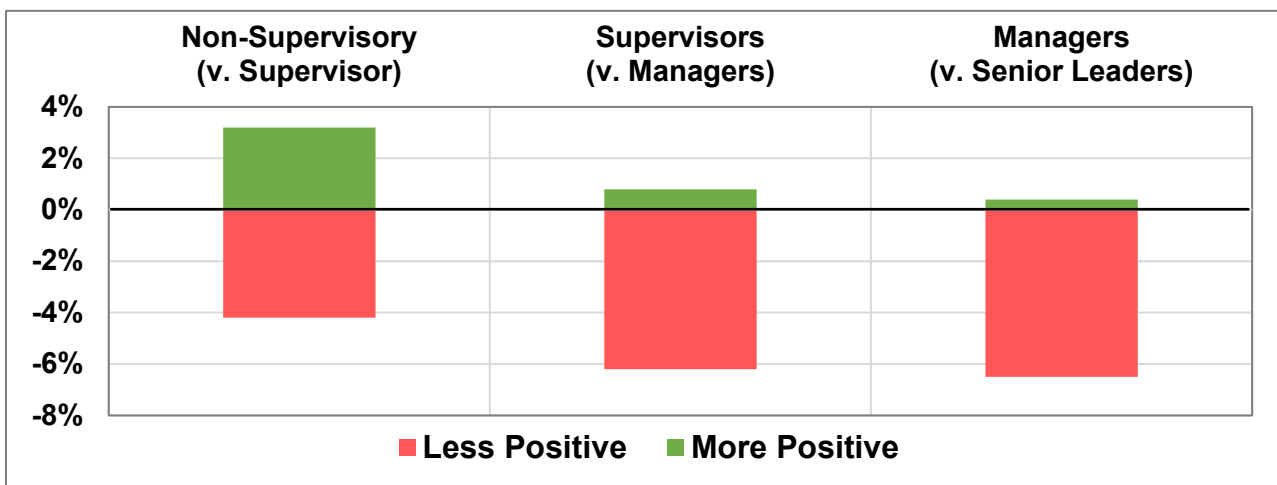
- LGBT had the least favorable aggregate differences in positive perceptions (vs. participants who identified as Straight), as well as the lowest positive perceptions of any group, relative to the overall GSA (5.2% lower than the GSA average).
- Persons with Disabilities had the next least favorable aggregate differences in positive perceptions (vs. persons without disabilities), as well as the next lowest positive perceptions, relative to the overall GSA (3.3% lower than the GSA average).
- Participants who identified as either Hispanic or Latino or Black or African American both had positive perceptions that were lower than their respective comparator groups, and both were 0.3% lower than the overall GSA.
- Females had a higher *number* of FEVS measures with *lower* positive perceptions than Males; however, the *magnitude* of measures with *higher* positive perceptions than their comparator group gave them a higher average (and 0.7% higher than the overall GSA).

During the analysis of 2022 FEVS data, some of the most significant differences in positive perceptions were identified during the analysis of leadership levels. Initial analyses compared Non-Supervisors to Supervisors, Supervisors to Managers, and Managers to Senior Leaders; however, significant differences and notable trends identified during that analysis lead to deeper subsequent analyses of differences in positive leadership perceptions within particular topic areas.

During the initial analysis of leadership levels, the most notable findings related to group perceptions were that:

- Positive perceptions increase with each increase in leadership level (i.e., in aggregate, Supervisors feel more positive than Non-Supervisors, and Managers feel more positive than Supervisors, and Senior Leaders feel more positive than Managers).
- Non-Supervisors have positive perceptions *below the overall GSA average*.
- Team Leaders, Supervisors, Managers, and Senior Leaders all have increasingly more positive perceptions *above the overall GSA average*.
- Lower leadership levels have fewer positive measures and/or lower positive perceptions than the leadership level(s) above them.

FIGURE 11: Aggregate Positive FEVS Perceptions of Leadership Groups vs. Next Higher Level



- Non-Supervisors had lower aggregate positive perceptions than Supervisors, and the lowest overall positive perceptions of any leadership group (1% lower than the GSA).
- Supervisors had less favorable positive perceptions than Managers, but average positive perceptions were 2% higher than the overall GSA average.
- Managers had less favorable positive perceptions than Senior Leaders, but average positive perceptions that were 7% higher than the overall GSA average.
- Senior Leaders had the highest positive perceptions of any group, averaging more than 12% higher than the overall GSA average.

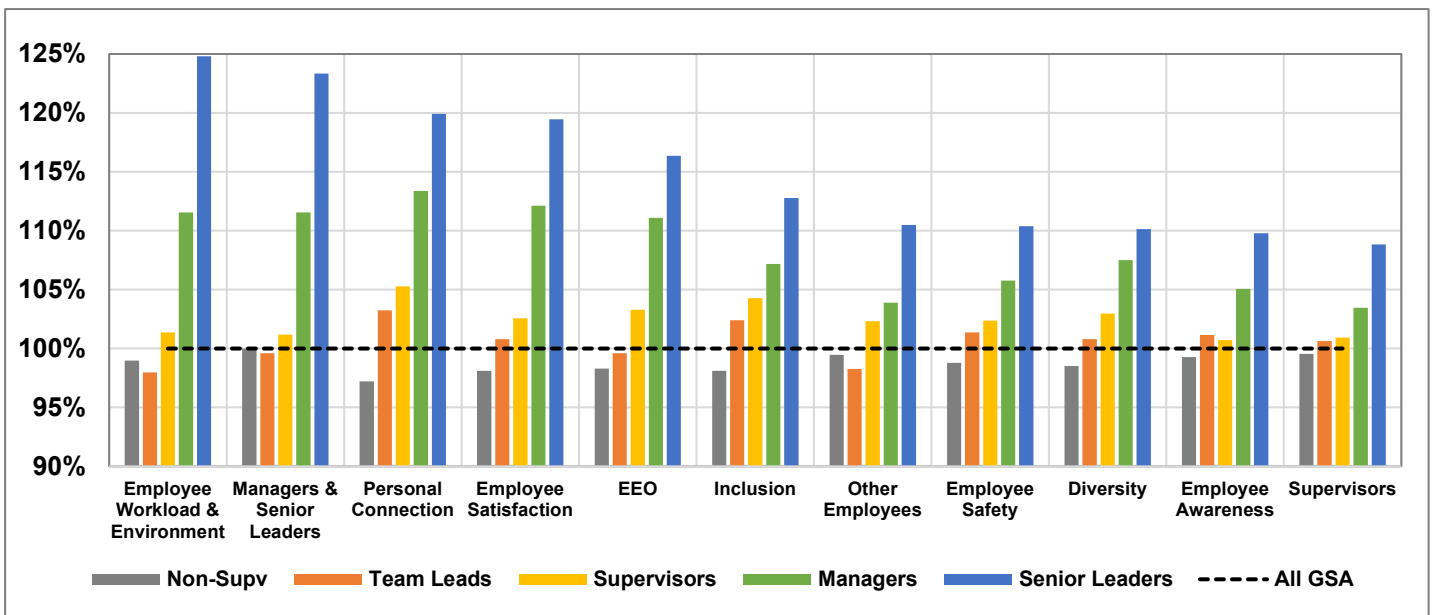
To further analyze the differences in positive perceptions of leadership levels, the 2022 FEVS measures were categorized into eleven general topic areas. Three topic areas focused on measures related to (1) EEO, (2) diversity, or (3) inclusion. Four topic areas focused on social and organizational relationships, including (4) personal connections to work, and participant perceptions of (5) other employees, (6) supervisors, and (7) managers/senior leaders. The final four topic areas related to measures that gauged (8) employee awareness, (9) employee satisfaction, (10) employee safety, and (11) workload and the work environment.

Analysis of positive perceptions by both leadership level and topic area found that, not only do positive perceptions increase with increasing leadership level, but also that there are notably more significant differences from topic area to topic area. For example, Senior Leaders have much more positive perceptions than other groups in measures related to Workload (25% higher than the GSA average), but are less divergent in measures about Diversity (10% above the GSA average).

TABLE 41: Major Topic Areas of 2022 FEVS Measures

EEO-related topics
Diversity-related topics
Inclusion-related topics
Questions involving personal connection to work
Questions involving perceptions of other employees
Questions involving perceptions of supervisors
Questions involving perceptions of managers/senior leaders
Questions involving employee awareness
Questions involving employee satisfaction
Questions involving employee safety
Questions involving employee workload/work environment

FIGURE 12: Positive 2022 FEVS Perceptions of Leadership Groups (by Topic Area) vs. GSA Avg.



- The greatest differences between Senior Leaders and the overall GSA was in the Employee Workload and Work Environment topic area, where positive perceptions of Senior Leaders averaged 25% higher than the GSA. Key measures included:
 - My workload is reasonable.
 - Continually changing work priorities make it hard to produce high quality work.
 - My work unit successfully manages disruptions to our work.
 - Employees are typically under too much pressure to meet work goals.

- The next greatest differences between perceptions of Senior Leaders and the overall GSA occurred in the topic area related to perceptions *about* Managers and Senior Leaders. In this topic area, positive perceptions of Senior Leaders were 24% higher than the GSA average. This topic area includes measures such as:
 - Management involves employees in decisions that affect their work.
 - Satisfaction with information received from management about the organization.
 - Senior leaders generate high levels of motivation and commitment.
 - Management makes effective changes to address challenges.
 - Senior leaders maintain high standards of honesty and integrity.

In some 2022 FEVS measures, Senior Leader positive perceptions were significantly higher than the GSA average. Significant differences occurred in measures relating to employee recognition, changing priorities, management communications, use of the FEVS survey to improve conditions, and in two measures related to employee involvement in decision-making.

TABLE 42: Key Measures with Significant Differences between Senior Leader & GSA Perceptions

2022 FEVS Measure	Difference
In my work unit, differences in performance are recognized in a meaningful way.	49%
Management involves employees in decisions that affect their work.	41%
I believe the results of this survey will be used to make my agency a better place to work.	41%
How satisfied are you with the information you receive from management on what's going on in your organization?	37%
Continually changing work priorities make it hard for me to produce high quality work.	37%
How satisfied are you with your involvement in decisions that affect your work?	33%

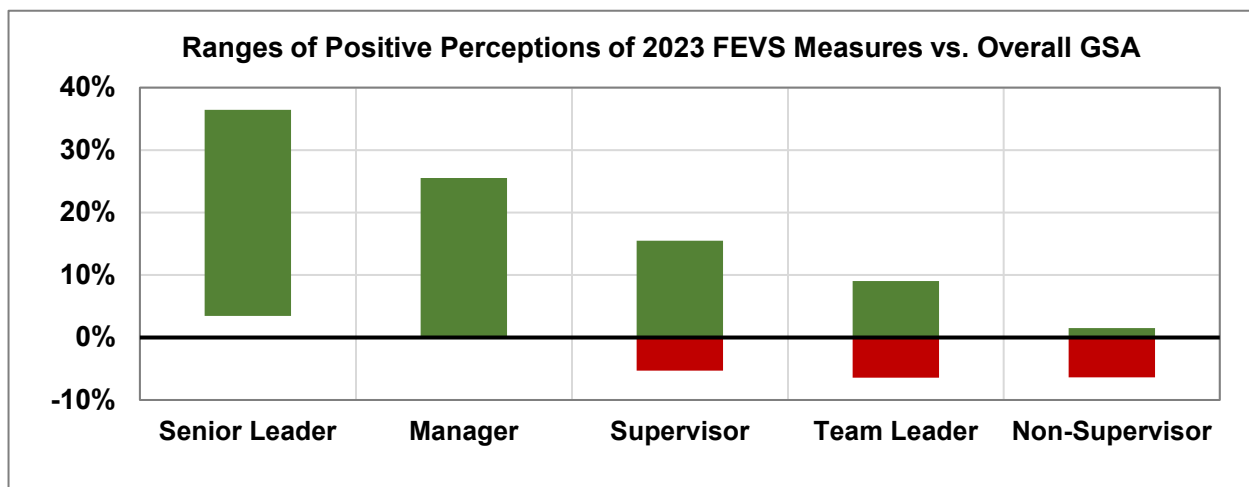
Analysis of 2023 FEVS Responses

Because 2023 FEVS data became available shortly after FY23 ended, analysis of that data was able to build upon the earlier 2022 analysis. As a result, the 2023 FEVS data analysis (1) went deeper into key *2022 FEVS measures of concern* of particular demographic groups and (2) broadened its focus to provide better insights into relevant *differences between groups*. Additionally, the analysis of 2023 FEVS data (3) explored measures that were *common concerns of different demographic groups*, as well as analyzed (4) areas of *intersectionality between FEVS responses and other MD-715 analysis areas* (e.g., data triggers, EEO complaints, exit surveys, and disciplinary actions).

The 2023 data differs somewhat from the 2022 data, in that the 2023 FEVS included some new FEVS measures and one new category (the sexual orientation category was expanded in 2023, separating LGBT into independent Lesbian/Gay/Bisexual (LGB) and Transgender categories).

Whereas the analysis of 2022 FEVS demographic responses focused primarily on *average* positive perceptions, and the differences between relevant *comparator groups* (e.g., LGBT vs. straight, Black or African American vs. White, PWD vs. people without disabilities), the analysis of 2023 FEVS focused instead on *ranges* of differences in perceptions of each demographic group, and normalized those results by showing those ranges *relative to the overall GSA*. Both positive and negative perceptions of demographic groups were evaluated, and found to show similar patterns (i.e., similar relative “high” and “low” for each demographic group); however, the main area of focus of the 2023 FEVS analysis is on differences in positive perceptions.

FIGURE 13: Ranges of Positive FEVS Perceptions of Leadership Groups vs. Overall GSA



- Senior Leaders (163) had the highest overall positive perceptions of all demographic groups (ranging from 3% to 36% higher than the GSA), as well as the highest positive perceptions of all 23 demographic groups in 87 of the 89 FEVS measures analyzed.
- Managers (677) had the next highest positive perceptions (ranging from 0.2% lower (in one measure) to 26% higher than the overall GSA averages for each measure).
- Supervisors (1055), Team Leaders (744), and Non-Supervisors (5048) each had a progressively larger proportion of their respective positive perceptions fall *below* the average perceptions of the overall GSA. Supervisor positive perceptions fell below the GSA in 7 measures, Team leaders were below the GSA in 51 measures, and Non-Supervisor positive perceptions fell below those of the GSA in 81 of the 89 measures.

The four FEVS measures in which Senior Leaders differed the most from the overall GSA include one measure related to employee recognition and two measures about employee involvement in decisions that affect their work (all three of which were also major areas of divergence in the 2022 FEVS), as well as one measure that relates to perceptions about arbitrary action, personal favoritism and/or political coercion.

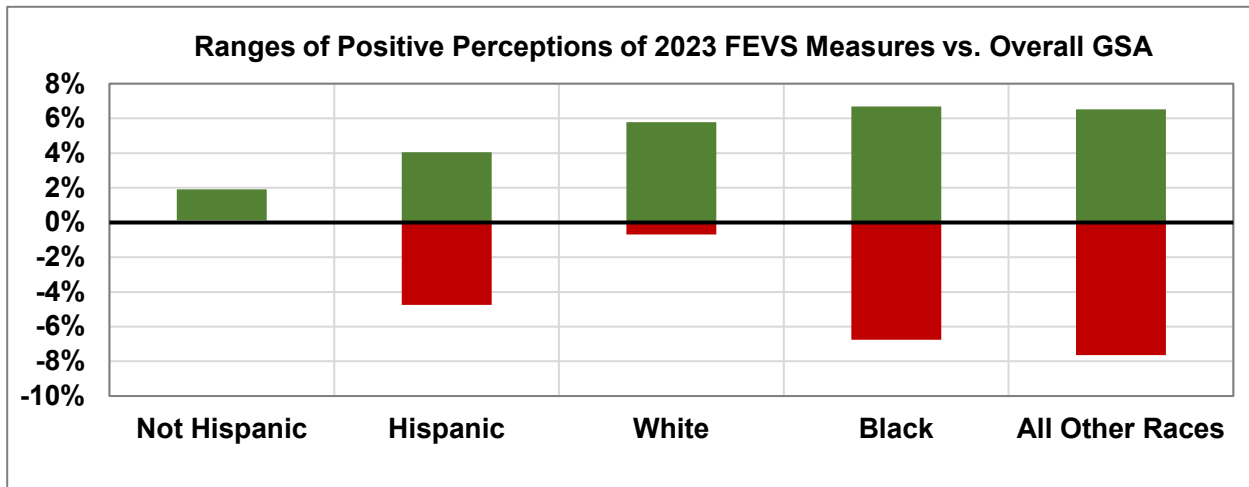
TABLE 43: FEVS Measures with Largest Differences between Senior Leaders & Overall GSA

FY23 FEVS Measure	Difference
In my work unit, differences in performance are recognized in a meaningful way.	36%
Management involves employees in decisions that affect their work.	36%
How satisfied are you with your involvement in decisions that affect your work?	33%
In my organization, arbitrary action, personal favoritism and/or political coercion are not tolerated.	31%

For race/ethnicity groups, positive FEVS perceptions fell into two general categories:

- Participants who identified as White or *Not* Hispanic or Latino had positive perceptions that were predominantly higher than those of the overall GSA.
- Participants who identified as Hispanic or Latino, Black or African American, or All Other Races had wider ranges of positive perceptions, and for each group, about half of their respective perceptions were *more* positive than those of the overall GSA and roughly half were *less* positive than the overall GSA.

FIGURE 14: Ranges of Positive FEVS Perceptions of Race/Ethnicity Groups vs. Overall GSA



For Hispanic or Latino participants, the most notable measures (all of which had lower positive perceptions than the overall GSA) were FEVS measures related to recognition, involvement and influence in decisions that affect their work, and information received from management.

TABLE 44: Measures in Which Hispanic or Latino 2023 FEVS Participants Differed Notably from the Overall GSA

2023 FEVS Measure	Difference
In my work unit, excellent work is similarly recognized for all employees (e.g., awards, acknowledgements).	-4%
Management involves employees in decisions that affect their work.	-4%
How satisfied are you with the information you receive from management on what's going on in your organization?	-3%
I can influence decisions in my work unit.	-3%

Participants who identified as Black or African American had the least positive perceptions of all race groups. The most notable differences related primarily to EEO and diversity factors, including issues such reprisal, fairness, personal favoritism, and diversity.

TABLE 45: Measures in Which Black or African American 2023 FEVS Participants Differed Notably from the Overall GSA

2023 FEVS Measure	Difference
I can disclose a suspected violation of any law, rule, or regulation without fear of reprisal.	-7%
In my organization, arbitrary action, personal favoritism, and/or political coercion are not tolerated.	-6%
My organization's management practices promote diversity (e.g., outreach, recruitment, promotion opportunities).	-5%
I can influence decisions in my work unit.	-5%
My supervisor provides opportunities fairly to all employees in my work unit (e.g., promotions, work assignments).	-5%
My supervisor demonstrates a commitment to workforce diversity (e.g., recruitment, promotion opportunities, development).	-4%

- The measure for which Black or African American FEVS participants had the most positive perceptions relative to GSA is “*I believe the results of this survey will be used to make my agency a better place to work.*”
- Three of the least positive measures for Black or African American participants each specifically mention promotion opportunities, a prominent topic of FY23 EEO complaints,⁸⁷ exit survey results from 2019 thru 2023,⁸⁸ and in data-related triggers derived from analysis of applicant flow data for internal competitive promotions.⁸⁹
- In common with Hispanic or Latino participants, Black or African American participants also had low positive perceptions about their ability to influence decisions in their work units. In contrast, Senior Leaders had notably *high* positive perceptions in that measure.

⁸⁷ In FY23, promotion/non-selection was the most prominent issue of complainants who alleged Race – Black or African American as a basis, accounting for 33% of their discrimination complaints.

⁸⁸ Promotion/advancement issues were the most prevalent issue cited among narrative GSA exit survey responses of separating employees who identify as Black or African American.

⁸⁹ In FY23, selection rates for internal competitive promotions were 61% for Black or African American Males and 83% for Black or African American Females, relative to their respective referral rates. From FY19 to FY22, selection rates for Black or African American Males and Black or African American Females to GS13, GS14, and GS15 merit promotions to mission critical occupations averaged 50% and 65%, respectively, compared to their respective proportions among best-qualified applicant pools.

Participants who identified as any other race (other than White or Black or African American) and who did not identify as Hispanic or Latino are categorized as “All Other Races.”

TABLE 46: Measures in Which *All Other Races* FEVS Participants Differed Notably from the GSA

2023 FEVS Measure	Difference
Considering everything, how satisfied are you with your pay?	-8%
I receive the training I need to do my job well.	-3%
I can influence decisions in my work unit.	-3%
New hires in my work unit (i.e., hired in the past year) have the right skills to do their jobs.	-3%

- FEVS participants in the All Other Races category had the lowest positive perceptions in measures related to pay, training, and the skills of new hires.
- In common with both Hispanic or Latino participants and Black or African American participants (and in contrast to Senior Leaders), FEVS participants in the All Other Races category also had low positive perceptions about their ability to influence decisions in their work units.
- As with Black or African American participants, All Other Races participants also had the most positive perceptions relative to GSA in the measure “*I believe the results of this survey will be used to make my agency a better place to work.*”

The positive perceptions of PWD were the third lowest of all demographic groups (after the Transgender category and separate Lesbian/Gay/Bisexual category). While PWD did not have the lowest positive perceptions of all groups, they did have the unfavorable distinction of being the *only* demographic group to have lower positive perceptions than GSA average in *all* 89 FEVS measures.

FIGURE 15: Positive Perceptions of PWD and Persons without Disabilities

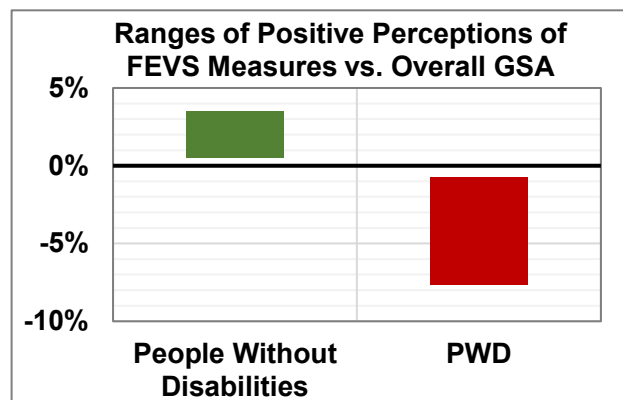


TABLE 47: Measures in Which PWD FEVS Participants Differed Notably from the Overall GSA

2023 FEVS Measure	Difference
How satisfied are you with the recognition you receive for doing a good job?	-8%
I have similar access to advancement opportunities (e.g., promotion, career development, training) as others in my work unit.	-7%
Considering everything, how satisfied are you with your pay?	-7%
My talents are used well in the workplace.	-7%
How satisfied are you with your involvement in decisions that affect your work?	-7%
In my organization, arbitrary action, personal favoritism, and/or political coercion are not tolerated.	-7%
I believe the results of this survey will be used to make my agency a better place to work.	-6%

- PWD have low positive perceptions about *satisfaction with the recognition you receive* (a significant GSA-wide FEVS topic of concern to many different groups).
- PWD are the only group for which “*similar access to advancement opportunities*” is among their lowest scored measures, and one of only two groups for which “*my talents are used well in the workplace*” is among the measures with lowest positive perceptions.
- As with Black or African American participants, PWD had low perceptions about their organization’s tolerance of arbitrary action, personal favoritism, and/or political coercion.
- PWD had low positive perceptions of “*I believe the results of this survey will be used to make my agency a better place to work.*” In contrast, both Black or African American and All Other Races participants had high positive perceptions of that measure.

LGB and Transgender participants had the least favorable positive perceptions of demographic groups. This was also the case in the 2022 FEVS; however, in 2022, those two categories were a single (LGBT) FEVS group. The separation of LGBT into LGB and Transgender categories enabled subsequent analyses to differentiate between perceptions and issues of concern for both groups.

Positive perceptions of LGB participants were the second lowest of all groups, not only due to lower positive perceptions than GSA in 99% of the 2023 FEVS measures, but also because of the magnitude of their differences in perceptions. For example, a total of 623 group-specific measures were analyzed across all race, ethnicity, and PWD-related groups, and the *single* lowest positive perception (of any group and any measure) was 7.6% below the GSA. In contrast, LGB alone had *eighteen* FEVS measures (20%) with positive perceptions below that.

TABLE 48: Measures in Which LGB FEVS Participants Differed Notably from the Overall GSA

2023 FEVS Measure	Difference
In my work unit, differences in performance are recognized in a meaningful way.	-12%
My talents are used well in the workplace.	-11%
How satisfied are you with the information you receive from management on what's going on in your organization?	-11%
Management involves employees in decisions that affect their work.	-11%
In my organization, senior leaders generate high levels of motivation and commitment in the workforce.	-10%
Considering everything, how satisfied are you with your pay?	-10%
How satisfied are you with the recognition you receive for doing a good job?	-9%

- Among the seven measures for which LGB had the most significant differences from GSA, most measures address issues in common with the previous race, ethnicity, and PWD groups, including topics such as employee recognition and involvement in decision-making, communications from management, use of personal talents in the workplace, and pay.
- LGB are the only demographic group for which the measure “*senior leaders generate high levels of motivation and commitment*” is among those for which they have the lowest positive perceptions.

Transgender FEVS participants had, by far, the lowest positive perceptions of all groups, averaging 14% below the GSA (and ranging as far as 48% below the GSA average), with ten different FEVS measures having positive perceptions more than 25% below the overall GSA.

Notably, five of the ten FEVS measures for which *Transgender* participants had the *lowest* positive perceptions are measures for which *Senior Leaders* had the *highest* positive perceptions.

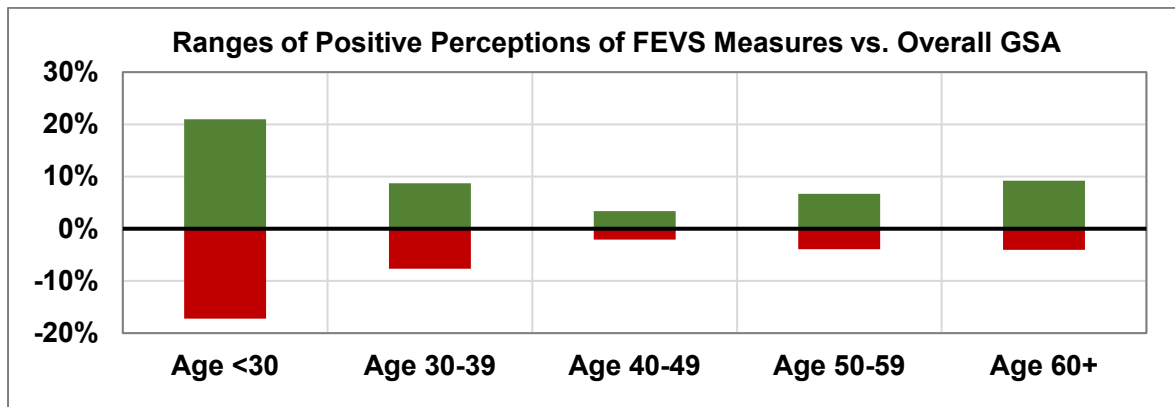
TABLE 49: Measures in Which Transgender FEVS Participants Differed Notably from the GSA

2023 FEVS Measure	Difference
Management involves employees in decisions that affect their work.	-48%
In my work unit, differences in performance are recognized in a meaningful way.	-45%
How satisfied are you with the information you receive from management on what's going on in your organization?	-37%
My organization's management practices promote diversity (e.g., outreach, recruitment, promotion opportunities).	-36%
In my organization, arbitrary action, personal favoritism and/or political coercion are not tolerated.	-35%
I am comfortable expressing opinions different from other employees in my work unit.	-34%
I can be successful in my organization being myself.	-34%
I believe the results of this survey will be used to make my agency a better place to work.	-31%
How satisfied are you with your involvement in decisions that affect your work?	-27%
My organization's senior leaders maintain high standards of honesty and integrity.	-24%

- Many measures in which Transgender participants had their lowest positive perceptions are issues common to other groups (e.g., recognition, involvement in decision-making, belief that FEVS will be used to improve things); however, Transgender participants had *significantly* more pronounced and unfavorably lower differences in those measures, compared to the positive perceptions of other groups and the overall GSA.
- Transgender participants had notably lower positive perceptions of their organizations' promotion of diversity; the standards of honesty and integrity of senior leaders; and organizational tolerance of arbitrary action, personal favoritism and/or political coercion.
- Transgender participants also had notably lower positive perceptions of several inclusion-related measures, including "*I am comfortable expressing opinions that are different from other employees in my work unit,*" "*I can be successful in my organization being myself,*" and "*In my work unit, people's differences are respected.*"

FEVS data for 2023 was also analyzed according to age groups.

FIGURE 16: Positive Perceptions of Age Groups vs. Overall GSA



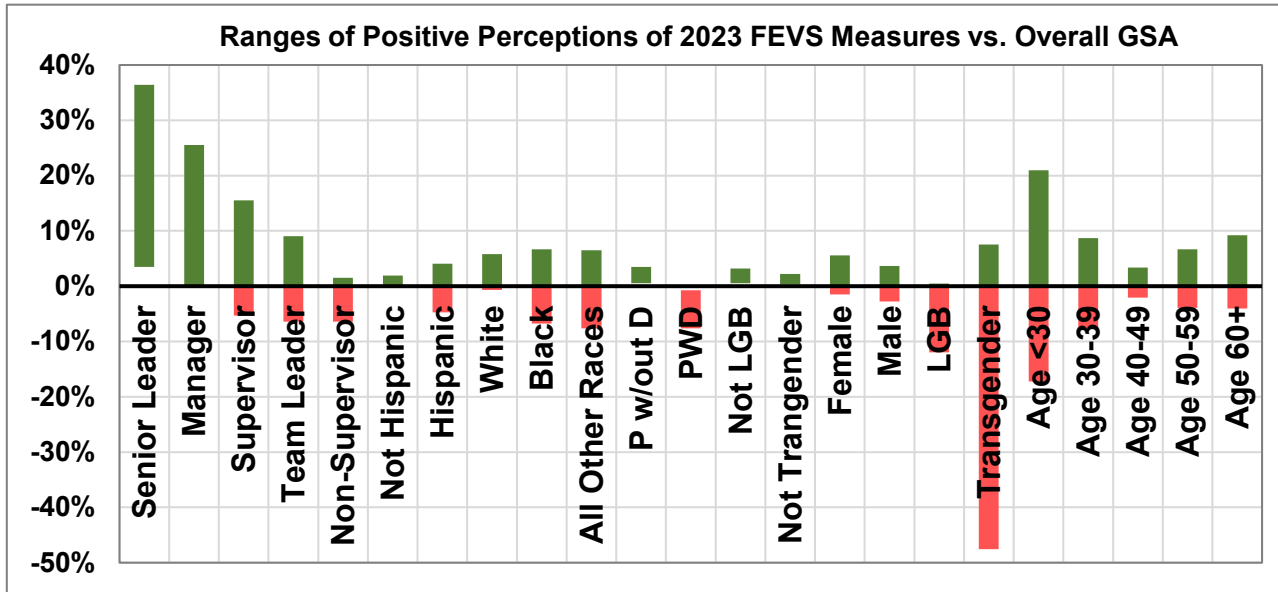
- Each age group had positive perceptions above and below the overall GSA average.
- Participants less than 30 years of age had the third highest average positive perceptions of all demographic groups (lower only than Senior Leaders and Managers).
- Participants less than 30 years of age also had the widest range of differences in positive perceptions of any age group, ranging from the lowest overall positive perceptions of *any* demographic group (for two measures: *satisfaction with pay* and *strong personal attachment to the organization*) to the third highest perceptions of any demographic group (after Senior Leaders and Managers) for 50 of 89 measures.
- Predictably, the measures for which participants less than 30 years of age had the lowest positive perceptions include many generally associated with newer employees.

TABLE 50: Measures in Which FEVS Participants Age <30 Years Differed Notably from the GSA

FY23 FEVS Measure	Difference
Considering everything, how satisfied are you with your pay?	-17%
I feel a strong personal attachment to my organization.	-13%
I can make decisions about my work without getting permission first.	-9%
I identify with the mission of my organization.	-9%
My job inspires me.	-7%
In my work unit, differences in performance are recognized in a meaningful way.	-6%
My work gives me a feeling of personal accomplishment.	-5%
The work I do gives me a sense of accomplishment.	-3%

Collectively, the ranges of positive perceptions of demographic groups varied widely across leadership levels and ethnicity, race, disability status, gender/sex, and age categories.

FIGURE 17: Ranges of Positive 2023 FEVS Perceptions of All Groups vs. Overall GSA



Survey Participation Rate Analysis

Five survey instruments were analyzed during the FY23 MD-715 reporting cycle. The most notable findings related to group participation rates were generally high participation rates for White Females and generally low participation rates for Black or African American Males. Three of the survey instruments did not analyze Male and Female categories separately within individual race/national origin groups. Additionally, FEVS demographic results only include specific race/national origin breakouts (e.g., Hispanic or Latino, White, and Black or African American). Asian is not categorized separately, but is included in an All Other Races category.

TABLE 51: Group Participation Rates in Surveys Analyzed for FY23 MD-715 Report, vs. Overall GSA

	HM	HF	WM	WF	BM	BF	AM	AF
Exit Surveys 2019-2023	83%	109%	94%	129%	67%	103%	115%	99%
2022 FEVS	104%		105%		80%		N/A	
2023 FEVS	104%		99%		78%		N/A	
Pulse Survey 1	105%		118%		66%		88%	
Pulse Survey 2	100%	100%	105%	136%	55%	73%	77%	99%

Consolidated Major Data Triggers

The most significant FY23 data triggers relate to different aggregate employment outcomes and participation rates for different demographic groups. Most illustrative of those differences are comparisons between the generally favorable aggregate outcomes for White Females (across nearly all analysis areas) and the generally unfavorable aggregate outcomes for Black or African American Males (and to a lesser extent, Black or African American Females, Hispanic or Latino Males, and Hispanic or Latino Females).

Data-related triggers fall into two general categories: Areas where high rates are favorable (e.g., selections, awards, and performance) and areas in which low rates are favorable (e.g., discipline).

TABLE 52: Major Triggers – Situations Where High Rates are Favorable/Desired

Situations Where High Rates are Favorable	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Selection rates to New Hires	102%	111%	106%	165%	78%	78%	64%	118%	75%	51%
Selection rates to Internal Competitive Promotions	73%	131%	107%	126%	61%	83%	88%	118%	112%	132%
Selection rates to Competitive Development Programs	133%	80%	102%	118%	80%	66%	114%	159%	87%	53%
Selection rates to Details	102%	83%	162%	117%	64%	63%	0%	183%	116%	48%
Selection rates to Temporary Promotions	132%	99%	105%	115%	89%	56%	148%	297%	104%	76%
Level 5 Performance Ratings	78%	92%	103%	134%	65%	81%	89%	111%	82%	79%
Per Capita Time-Off Awards	95%	95%	94%	134%	54%	95%	91%	115%	95%	89%
Per Capita Cash Awards < \$4000	103%	99%	103%	92%	110%	107%	94%	77%	96%	95%
Per Capita Cash Awards \$4000+	79%	75%	112%	116%	78%	86%	97%	95%	63%	62%
Quality Step Increases	63%	115%	94%	147%	75%	78%	132%	76%	54%	48%
Performance-Based Pay Increases	51%	28%	135%	122%	30%	47%	239%	122%	30%	116%
FY22/FY23 Appointments via Direct Hire Authority AYM	75%	124%	82%	110%	77%	130%	118%	128%	66%	74%
Participation in FY22 & FY23 FEVS	104%		102%		79%		N/A		69%	
Participation in Pulse Survey 1	105%		118%		66%		88%		62%	
Participation in Pulse Survey 2	100%	100%	105%	136%	55%	73%	77%	99%	N/A	N/A
Participation in GSA Exit Surveys	83%	109%	94%	129%	67%	103%	115%	99%	97%	109%
Would recommend GSA as great place to work	117%	76%	103%	94%	112%	99%	108%	89%	98%	93%

Triggers for PWD and PWTD are less clear, as very low rates of self-identification by applicants for new hires and internal competitive promotions significantly reduce the accuracy of those analyses, and low self-identification rates for key employee groups (especially employees in high grades) negatively impact many different analysis areas.

TABLE 53: Major Triggers – Situations Where Low Rates are Favorable/Desired

Situations Where <u>Low</u> Rates are Favorable	HM	HF	WM	WF	BM	BF	AM	AF	PWD	PWTD
Disciplinary Actions	109%	62%	95%	61%	224%	127%	70%	22%	134%	229%
Removals from Permanent Workforce	115%	128%	78%	63%	208%	92%	118%	133%	135%	318%
Employees in Stalled Career Ladders	136%	76%	84%	68%	150%	127%	139%	157%	166%	75%
Per Capita EEO Complainants by Bases	137%		19%		252%		142%		N/A	
Procedural Disapprovals for Details	153%	289%	89%	54%	95%	115%	147%	182%	113%	117%
Ineligibility for High Grade Merit Promotions	112%	108%	107%	87%	111%	106%	87%	81%	N/A	N/A
Have a Disability, but Do Not Self-Identify	126%	73%	110%	52%	129%	87%	122%	65%	N/A	N/A
Would <u>not</u> recommend GSA as great place to work	46%	212%	97%	93%	147%	93%	0%	201%	90%	125%

Root Cause Analyses

Many triggers that were identified came from analysis of consolidated (aggregated) statistics for the entire agency. Others were identified from analyses of large subgroups, such as grade levels, occupational series, or services or staff offices. 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” for some individuals within a group can be offset by “lows” for 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 is only a starting point, and may not have visibility of all potential barriers.

The root causes for the identified triggers can vary, but generally fall into one of several major categories, described below. Depending on the nature of a particular root cause, different actions are appropriate in each situation. Thus, systematic investigation is always required to determine the actual root cause (or realm of potential root causes), before any other actions are taken.

There are several major categories of *potential* root causes of MD-715 triggers. These categories may occur in combination (i.e., one trigger might have multiple root causes in multiple categories). Notably, while the intent of trigger identification and barrier investigation is to identify and eliminate discriminatory barriers, not all identified triggers are related to unlawful discrimination, nor are all triggers actionable. The major categories of root causes include (1) data-related issues, (2) benign circumstance, (3) merit, (4) lawful discrimination, and (5) unlawful discrimination.

- Data Issues: The trigger identification process uses agency data that may not always be complete and/or entirely accurate. Thus, a critical next step in almost all root cause analyses is to validate initial inputs, calculations, and resulting findings. 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.
 - 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.
 - 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) and internal comparators (which are derived from self-identified workforce data).
- Merit: This category includes situations where specific employment outcomes (positive or negative) are a result of 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 of individual employees, nor do any analysis findings suggest that all employees in a particular group have higher or lower merits than all members of any comparator group. Examples of merit-related outcomes for individuals include:
 - An employee consistently and significantly exceeds performance goals, measures, and expectations throughout the year, and receives a Level 5 performance rating.
 - An employee competes for an internal competitive promotion opportunity, and is selected on the basis of their relative ability, knowledge, and skills, after a fair and open competition which assured that all applicants received equal opportunity.

- A diverse and trained selection panel is convened and follows GSA's *Candidate Selection Guidance for Selecting Officials* to identify a recommended selection, based solely on the relative abilities, knowledge, and skills required for the position.
- 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, and allegations of harassment) can be triggers on their own. 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/managers, or individuals analyzing the information). For example:
 - An applicant perceives that they were discriminated against, because they were not selected for an employment opportunity.
 - A manager perceives that a particular group is underrepresented within an organization, and that action should be taken to address the underrepresentation by recruiting more applicants from that group. Instead, what the manager should first do is determine if the group is actually underrepresented (through careful benchmarking), and if it is, the appropriate next step would then be to determine the root cause(s) of the underrepresentation. In this example, if a workplace issue was found to be creating low representation by causing high *separation* rates, then hasty recruitment actions would not address the underlying issue, and high turnover rates would be unresolved and expected to continue.
- Benign Circumstance: This category pertains to situations where outcomes are analyzed and not found to be related to discrimination, a lack of access, or inequities. For example:
 - A general employment opportunity is widely advertised to all GSA employees using multiple accessible means; however, a disproportionately low number of applicants are from a particular demographic group, and further analysis of their low rate of participation finds no particular reasons for the lack of applications.
 - An actual workforce analysis in FY21 found that the selection rates of Males to Competitive Development Programs fell far below expected rates. Subsequent analyses of potential root causes found that the CDP selection process was not only fair, but also that it had been intentionally structured in order to minimize potential discrimination, and that the unexpectedly one-sided outcomes (favorable for Females) were only circumstantial.

- Certain occupational series have inherently lower or higher potential for advancement than other series (e.g., there are no 1670 positions above GS13).
 - Certain occupational series have legitimately greater requirements for on-site work, inherently limiting telework opportunities relative to other occupational series.
 - In some cases, outcomes in one analysis area are interconnected with outcomes in other areas. For example, Cash Awards and Quality Step Increases are closely connected to performance ratings, while telework eligibility and upward mobility (beyond GS13) are both influenced by occupational series.
- Discrimination:
 - Lawful Discrimination: This category pertains to circumstances in which the agency may lawfully engage in actions that benefit particular groups and/or permit the agency to deviate from normal procedures, such as following requirements related to veterans' preference^{90 91} and providing disability-related reasonable accommodations, including personal assistance services, to qualified employees and applicants for employment. For example:
 - 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.
 - A qualifying 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.

⁹⁰ See 5 USC § 2302(b)(11) Prohibited Personnel Practices. "Any employee who has authority to take, direct others to take, recommend, or approve 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;"

⁹¹ Including use of Direct Hire Authorities that expedite hiring by *eliminating* veterans' preference, competitive rating and ranking, and "rule of three" procedures. See <https://www.opm.gov/policy-data-oversight/hiring-information/direct-hire-authority/#url=Fact-Sheet>

- Direct-Hire Appointment Authority AYM is used appropriately to non-competitively appoint a new hire quickly, to meet a critical agency need.
- Unlawful Discrimination: This is a fundamental focus area of MD-715 analyses 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, 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 include:
 - A supervisor discriminates for or against a nominee to an employment opportunity, on the basis of the applicant’s race.⁹²
 - A selecting official chooses an applicant, based on personal favoritism, rather than solely on the basis of relative ability, knowledge and skills, after fair and open competition.⁹³

FY23 root cause analyses found some proximal root causes related to (1) data issues, (2) perceptions, (3) benign circumstances, and/or (4) lawful discrimination; however, no triggers were found to have root causes related to (5) unlawful discrimination. Deeper barrier investigations of FY23 triggers are ongoing, and effective and collaborative barrier analysis is a FY24 priority focus area.

⁹² See 5 USC § 2302(b)(1)

⁹³ See 5 USC § 2301(b)(1)

E.9 Accomplishments

In FY23, GSA had several noteworthy accomplishments related to EEO and MD-715:

- For the second consecutive year, GSA was named by the Partnership for Public Service as the 4th Best Place to Work among mid-sized Federal agencies out of 27 agencies in the mid-size category.⁹⁴ Among agencies with indices scores, GSA ranked #1 in Transparency and #2 in Equity, Effective Leadership of Senior Leaders, Teamwork, Innovation, and Customer Service. Of 432 agency sub-components analyzed, six GSA offices and both services were in the top 100 sub-components and three offices ranked among the top 20.
- GSA developed and implemented significant improvements to data management and sharing in support of MD-715 analysis and reporting. OCR, OHRM, the Office of the General Counsel, Office of Customer Experience, Office of the Administrator, Senior Advisor for Equity, and Office of the Chief Information Officer collaborated to clarify MD-715 requirements and establish effective internal procedures for sharing critical data. Resulting changes enabled deeper, more effective root cause analyses of potential barriers (including intersectionality analyses across disparate systems), major improvements to the accuracy and completeness of reasonable accommodations and anti-harassment data, and significant progress toward eliminating identified barriers and reported deficiencies.
- GSA updated its Policy Statement on Equal Employment Opportunity and timely issued its annual Administrator's EEO Policy Statement.
- GSA updated its Policy Statement on Harassment, including Sexual and Non-Sexual.
- OCR released its FY2023-2025 Strategic Plan outlining the OCR mission, vision, values, strategic objectives and initiatives, providing a roadmap to continue to provide efficient, effective, and innovative services.
- In alignment with the Strategic Plan goals of Organizational Excellence and Innovation, OCR created an internal website that contains administrative and information for quick reference (e.g., directives, policies, procedures, tools, training, reports, and other resources) and an "OCR Resources" webpage with tailored resources for employees, managers and supervisors, and for external EEO complaints, as well as links to

⁹⁴ <https://bestplacestowork.org>

streamline access to partner programs (Anti-Harassment, Reasonable Accommodations, DEIA, and Special Emphasis Programs and Affinity Groups).

- GSA conducted a triennial Technical Assistance Visit teleconference with EEOC.
- GSA implemented improved tracking and engagement procedures to enable achievement of 100% timely completion of mandatory training for all GSA supervisors and managers on topics of anti-harassment, reasonable accommodations, EEO, and alternative dispute resolution.
- In partnership with OHRM and the Senior Advisor for Equity, OCR offered regular live, interactive, facilitated discussions as part of its ongoing DEIA Dialogues series, providing a regular forum for discussions about diversity, equity, inclusion, and accessibility in GSA.
- GSA revised its New Employee Orientation materials to improve training related to EEO and DEIA at GSA.
- GSA provided important relevant inputs to support the Federal Interagency Technical Working Group on Race and Ethnicity Standards relating to potential revisions to Statistical Policy Directive No. 15.
- GSA issued *IT Insider* articles commemorating Global Accessibility Awareness Day; raising awareness about accessibility; and providing technology tools to help make web and mobile content, documents, and meetings more accessible for persons with disabilities.
- GSA modified the education requirements for entry-level applicants to the 1102 (contracting) occupational series, in order to broaden candidate pools. More than 17% of GSA employees are 1102s, making it GSA's most populous occupational series.
- OHRM and the OCR jointly sponsored DEIA learning opportunities as part of GSA's commitment to building a high-performing and culturally competent workforce, positioned and skilled to advance DEIA in areas of workplace culture, enterprise performance, agency operations, and mission delivery. Key offerings included Developing a Bias-free Workplace, Psychological Safety, and Inclusive Intelligence, which were made available to all employees and also as supervisor-specific offerings.
- The GSA IDEA Champions sponsored a Tech Talk by the Office of Digital Management focusing on DEIA in Information Technology.

- OCR hosted a Speaker Series for Conflict Resolution Day. The Chief of Conflict Management & Dispute Resolution Education and Training from the Air Force Negotiation Center discussed negotiation, facilitation, conflict management, interest-based negotiation, and the use of Alternative Dispute Resolution techniques.
- OCR launched its first edition of the “OCR In Focus” virtual newsletter to share information about upcoming EEO training, news, and key topics, such as language access, the Affirmative Employment Program, inclusive language, prohibited discrimination, and EEO complaint processing.
- Throughout FY23, OCR hosted employee and supervisor-specific training events, including courses such as A Glimpse of Civil Rights, Fundamentals of Environmental Justice, Identifying and Interrupting Unconscious Bias, Fair Employment Rights and Responsibilities, and A Lesson in EEO for Supervisors.
- OCR used insights gained during its FY22 “Customer-Focused Journey Mapping” project to develop and implement changes to simplify the EEO complaints process, enhance related communications, reassure stakeholders about fairness and impartiality, and address participant privacy interests.
- GSA engaged with EEOC to address inaccuracies with the National Civilian Labor Force and Occupational Civilian Labor Force benchmarks used across the Federal government, and showcased further improvements to a tool previously developed by GSA to create relevant alternative benchmarks for more effective MD-715 analyses.
- GSA received virtual training from the EEOC Affirmative Employment Program Manager for members of OHRM and OCR on EEOC Management Directive 715 and barrier analysis.
- GSA administered agency-wide Quarterly Pulse Surveys to supplement the Federal Employee Viewpoint Survey and obtain employee perspectives on key issues, such as the hybrid work environment, reentry, communications, resources, space optimization, and enhancing technical capabilities.
- In partnership with the GSA LGBT & Allies Employee Association, GSA celebrated Pride Month with presentations about LGBT authors and artists, and their respective contributions. The LGBT & Allies Employee Association also hosted “Year-Round Pride” monthly events on various relevant topics, as well as a “31 Days, 31 Icons” event showcasing one individual LGBT icon each day throughout the month of October.

- GSA revised and improved its No FEAR Act training for all employees, incorporating information on the Providing Urgent Maternal Protections (PUMP) For Nursing Mothers Act and making other changes to make the training more efficient and effective.
- GSA published its quarterly PWD SEP newsletter, *GSAbility News*, as a key source of information on events, topics, and programs relating to PWD. FY23 topics included non-apparent disabilities, limb differences and limb loss, and family support.
- GSA sponsored PWD-related events for National Disability Employment Awareness Month, the Americans with Disabilities Act Anniversary, and an event about the Experience of Disabled Veterans at GSA.
- In June 2023, after approval and submission of the Annual Agency EEO Program Status Report, the Office of Civil Rights developed and shared a comprehensive document with OHRM consolidating all MD-715-related plans; activities; and data, analysis, and reporting requirements, as well as their respective deadlines, in order to improve alignment and collaboration between offices on matters relating to MD-715.
- OCR generated quarterly Heads of Services and Staff Offices (HSSO) Snapshots focusing on complaint activity (e.g., volume, issues, bases, costs, outcomes).
- OCR provided MD-715 State of the Agency briefings to GSA senior leaders, MD-715 webinars for all GSA employees, and tailored briefings to Special Emphasis Program Managers and Executive Sponsors, as well as ad-hoc briefings to GSA subcomponents, the DEIA program, and other interested groups.
- OCR conducted customer engagement meetings with major GSA services and staff offices to provide tailored feedback on complaints activity, alternative dispute resolution, affirmative employment, and other relevant EEO topics.
- GSA partnered with EEOC, the Transportation Safety Administration, Department of Homeland Security, Department of Navy, Immigration and Customs Enforcement, Department of Justice, Social Security Administration, and other Federal agencies to discuss complaints processing and barrier analysis and share best practices.
- GSA established new guidelines for hiring candidates with disabilities under the Schedule A(u) excepted service authority, 5 CFR § 213.3102(u), regarding persons with intellectual disabilities, severe physical disabilities, or psychiatric disabilities.

- OHRM sponsored monthly “Employee Break Room” events on many topics relevant to EEO, including reasonable accommodations; the Federal Employee Viewpoint Survey; and details, temporary promotions, and other career enhancement opportunities.
- OHRM and OCR collaborated on Federal Employee Viewpoint Survey analyses, significantly expanding and improving analyses of survey responses of individual demographic groups (e.g., leadership levels, race/ethnicity, disability status, sex/gender, and age).
- OCR and OHRM implemented improvements related to notifications, tracking, and processing of allegations of harassment raised during the EEO complaints process.
- Throughout FY23, OCR provided training to 4,294 employees on twelve different topics, including unconscious bias, civil treatment for employees and supervisors, supervisory EEO responsibilities, new employee orientation, settlement official training, DEIA, civil rights, MD-715, and environmental justice, as well as various EEO-related speaker series topics.
- Throughout FY23, GSA participated in and/or hosted a wide variety of programs for many varied groups, including the Federal Inter-Agency Holocaust Remembrance Program and GSA’s DEIA Speaker Series, featuring recognized leaders and diversity professionals whose efforts, experiences, and advocacy inspired greater appreciation for inclusive excellence and encouraged diverse ideas and perspectives.
- GSA's Recruitment Program expanded both its internal and external outreach mechanisms. In partnership with the Special Emphasis Program Managers, the program engaged with various GSA Employee Resource Groups (ERG) to expand the GSA “Brand Ambassador” program and thereby expand recruitment messaging and outreach through their inclusion and membership. The entry-level consolidated recruitment program conducted both in-person and virtual outreach to a variety of Minority Serving Institutions (MSI), utilizing, where possible, alumni of those institutions to be part of those engagements. FY23 outreach efforts included Historically Black Colleges and Universities (HBCU), Hispanic-Serving Institutions (HSI), Tribal Colleges and Universities (TCU), Asian American and Pacific Islander-serving institutions (AANAPI), and PWD/PWTD-related institutions (e.g., Rochester Institute of Technology, Gallaudet University). Additionally, GSA participated with the Department of Veteran Affairs’ Veteran Readiness and Employment (VR&E) program to engage with the veteran community both onsite and virtually during their nationwide event.

- In FY23 OHRM created an American Sign Language (ASL) interpreter contract, with centralized funding, to assist deaf and hard of hearing employees gain improved accessibility to enterprise-wide events, meetings, and trainings.

E.10 Planned Activities

1. Conduct regular collaboration meetings between OCR and OHRM subject matter experts to:
 - a. Promote systematic progress on agency plans to eliminate the reported EEO barriers:
 - i. Eliminate untimeliness in the (1) processing of requests for disability-related reasonable accommodations and (2) providing of approved accommodations.
 - ii. Eliminate untimely conversions of eligible Schedule A(u) hires from the excepted service to the competitive service, including elimination of the current backlog of eligible Schedule A(u) hires overdue for conversion to the competitive service.
 - iii. Develop, execute, and report relevant affirmative action plans to improve recruitment, hiring, advancement, and retention of PWD and PWTD.
 - iv. Identify the status of all temporary employees and address any instances where temporary designations are incorrect and/or exceed respective appointment durations.
 - Improve management of excepted service Schedule A(u) employees hired in temporary status for purposes of observation, to ensure conversion to permanent status excepted services as soon as practicable after demonstrating the ability to perform required duties.
 - b. Coordinate between OHRM's recruitment programs⁹⁵ and the Affirmative Employment Program, to ensure collaboration in the development, implementation, tracking, and reporting of respective program efforts and initiatives relevant to their partner programs.
 - c. Collaborate to correct all unresolved compliance deficiencies
 - d. Continue collaboration on data improvement.
2. Implement quarterly internal oversight briefings to OCR and OHRM senior leaders to provide status updates and support systematic progress on collaboration efforts, including barrier elimination, root cause analyses, deficiency corrections, data sharing, and coordination between relevant programs (e.g., DVAAP, FEORP, SPP, AEP, and AAP for PWD).

⁹⁵ Federal Equal Opportunity Recruitment Program (FEORP), Disabled Veterans Affirmative Action Program (DVAAP), and Selective Placement Program (SPP)

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.



Aluanda Drain
Associate Administrator, Office of Civil Rights

4/2/2024

Date

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



Robin Carnahan
Administrator, General Services
Administration

4/2/2024

Date

Part G – EEO Program Self-Assessment Checklist

GSA conducted a mandatory annual assessment of its EEO Program 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 EEOC's Federal Sector EEO Portal (FedSEP) and associated supporting documentation and 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 (in accordance with their respective target dates), (5) modified dates must then be identified and documented, as well.

Because deficiencies are often interrelated, execution of certain planned corrective activities can sometimes simultaneously resolve multiple deficiencies. Some FY23 Part H plans therefore address several Part G deficiencies. For example, Part H corrective plan H.2 addresses three different Part G deficiencies associated with workforce data, corrective plan H.11 addresses two separate deficiencies related to applicant flow data, and corrective plan H.8 addresses five deficiencies associated with barrier identification and elimination.

Thirty-one Part G deficiencies were reported in FY22. During FY23, thirteen deficiencies were resolved entirely, significant progress was made toward resolution of seven of the remaining deficiencies, and one new deficiency was identified. As such, nineteen deficiencies are being reported in FY23, and are addressed in a total of eleven Part H plans. Table 54 summarizes all current deficiencies, after which follows the official EEOC Part G self-assessment checklist in its entirety.



TABLE 54: FY23 Part G Self-Assessment Deficiencies

Essential Element & Measure				Questions	Part H Plan(s)	
1	B	3	b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? If "yes", identify the EEO principles in the strategic plan in the comments column.	H.1	
				Has the agency allocated sufficient funding and qualified staffing to:		
2	B	4	a	2	Conduct a thorough barrier analysis of its workforce?	H.8
3	B	4	a	7	Maintain accurate data collection/tracking systems for workforce and applicant flow data?	H.2 & H.11
4	B	4	a	10	Effectively manage its reasonable accommodation program?	H.4
5	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
6	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
7	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:		
8	C	4	e	1	Implement the Affirmative Action Plan for PWD?	H.6 & H.7
9	C	4	e	2	Develop and/or conduct outreach and recruiting initiatives?	H.6 & H.7
10	C	4	e	4	Identify and remove barriers to EEO in the workplace?	H.8
11	C	4	e	5	Assist in preparing the MD-715 report?	H.6 & H.8
12	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?	H.9
13	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.8
14	D	4	b		Does the agency take specific steps to ensure qualified PWD are encouraged to apply for vacancies?	H.6
15	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?	H.6
16	E	1	a		Does the agency timely provide EEO counseling, pursuant to 29 CFR § 1614.105?	H.10
				Does the agency have systems in place to accurately collect, monitor, and analyze:		
17	E	4	a	2	The race, national origin, sex, and disability status of agency employees?	H.2
18	E	4	a	3	Recruiting activities?	H.7
19	E	4	a	4	External/internal applicant flow data concerning applicants' race/national origin/sex/disability status?	H.11

Notable progress was made in FY23 toward attaining compliance in each of these measures.



The deficiency in this Part G measure was new in FY23

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	Measure Met? (Yes/No/NA)	Comments
A.1.a	<p>A.1 – The agency issues an effective, up-to-date EEO policy statement.</p> <p>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)]</p>	Yes	The Administrator’s annual EEO Policy Statement was issued on July 11, 2023.
A.1.b	<p>Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation, and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]</p>	Yes	



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
A.2.a	A.2 – The agency has communicated EEO policies and procedures to all employees.		
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 C.F.R § 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 C.F.R § 1614.102(b)(7)]	Yes	
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R §1614.102(b)(5)]	Yes	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 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-for-individuals-with-disabilities-3



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 Compliance Indicator  Measures		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 1614.102(b)(5)] If “yes”, please provide how often.	Yes	All employees are informed during initial onboarding, as well as via training required within 90 days of accession and biennially thereafter. Employees who are supervisors or managers also receive formal EEO training, which is required within one year of accession or assignment to those positions, and at least once every three years thereafter.
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	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.



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 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 discussion. Annual meetings are held with heads of services and offices to discuss complaint activity, engagement in complaints processing and alternative dispute resolution, and affirmative employment program efforts related to their respective service or 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]	Yes	



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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, Sec. I]	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] If "yes", please provide the date of the briefing in the comments column.	Yes	August 3 and August 8, 2023
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	



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 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); 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.



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 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.	No	GSA's five-year Strategic Plan references both externally-facing and internally-facing Diversity, Equity, Inclusion, and Accessibility (DEIA) principles; however, EEO principles are included only in GSA's separate DEIA Strategic Plan. See Part H plan H.1.



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
B.4.a	B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.		
	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.8.
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	



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	B.4 (CONTINUED) - The agency has sufficient budget and staffing to support the success of its EEO program.		
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 demographics do not provide complete and accurate data required for MD-715 analyses or reporting. See Part H plans H.2 and H.11.
B.4.a.8	to effectively administer its special emphasis programs (such as, Federal Women's Program (FWP), Hispanic Employment Program (HEP), and Persons with Disabilities Program (PWDP))? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes	





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 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)(4)(ii)]	No	Significant improvements were made in FY23 in processing timeliness, data management, and data sharing; however, not all requests were either timely denied or timely provided. See Part H plan H.4.
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	

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 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure 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 C.F.R. § 1614.102(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	
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	
 Compliance Indicator  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]	Yes	
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	

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<p align="center">Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</p> <p align="center">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.</p>			
<p>➔ Compliance Indicator ➔ Measures</p>		<p>Measure Met? (Yes/No/NA)</p>	<p>Comments</p>
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. 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 services and staff offices (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.



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 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 40 harassment allegations made in FY23, 35 (87.5%) 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 29CFR 1614.203(d)(3)]	Yes	



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 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)(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 column.	No	Out of 203 FY23 requests for reasonable accommodations, 174 (86%) were timely processed. Twenty-three requests (11%) were untimely decided and six (3%) were untimely provided after approval. 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 executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	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-for-individuals-with-disabilities-3



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 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 to supervise in a workplace with diverse employees? [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	



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 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	



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 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)(2)]	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]	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	Significant improvements were made in FY23 to the timeliness, accuracy, and completeness of MD-715 data; however, applicant flow data and employee demographic data have key issues that impact MD-715 reporting and barrier analysis. 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)]	Yes	



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	C.4 (CONTINUED) – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.		
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)]	No	See Part H plans H.6 and H.7.
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	No	See Part H plans H.6 and H.7.
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	No	See Part H plan H.8.
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	No	See Part H plans H.6 and H.8.



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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.		
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 <u>Douglas v. Veterans Administration</u> , 5 MSPR 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 FY23 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	



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 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 matters such as environmental justice, complaints, MD-715, and DEIA. Furthermore, OCR engages with the heads of services and staff offices quarterly via tailored communications related to complaint activity, and annually to provide more comprehensive updates.
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	



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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		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, reasonable accommodation program, anti-harassment program, and/or external special interest groups? [see MD-715 Instructions, Sec. I]	Yes	
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)]	No	GSA's exit survey does not contain the questions required by 29 CFR § 1614 related to persons with disabilities. See Part H plan H.9.





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 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)(B)]	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)]	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)]	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, reasonable accommodation program, anti-harassment program, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	Yes	In addition to applicant flow data, employee data, and career development data, barrier analysis efforts regularly review and analyze data and information from other relevant sources (e.g., reasonable accommodations requests, allegations of harassment, grievances, EEO complaints, Federal Employee Viewpoint Survey (FEVS) results, Special Emphasis Programs, affinity groups, and key programs (e.g., Schedule A(u), career ladders, and temporary employees)).

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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	D.3 – The agency establishes appropriate action plans to remove identified barriers.		
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)]	Yes	
D.3.b	If the agency identified barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	No	See Part H plan H.8.
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes	
	D.4 – The agency has an Affirmative Action Plan for Persons with Disabilities, including those with targeted disabilities.		
	 Compliance Indicator  Measures	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)]	No	See Part H plan H.6.
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)]	No	See Part H plan H.6.

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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		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 plan Part H.10.
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(l)?	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(l)? If so, please provide the average processing time in the comments.	Yes	The average time to issue acceptance or dismissal decisions in FY23 was 35 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	



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 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	



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 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, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes	



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 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)]	Yes	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	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	



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 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)]	No	See plan Part H.7.
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.11.



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 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)(4)]	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]	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	



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 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 linked to relevant EEO laws, regulations, EEOC Management Directives, Instructions, and 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.
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 FY23, GSA engaged with several other agencies regarding EEO-related best practices (e.g., EEOC, Department of Justice, Social Security Administration, Department of State, Department of Homeland Security, and the Department of the Navy). Topics included barrier analysis, data sharing, complaints processing, benchmarking, as well as the Affirmative Employment Program and EEO-related best practices.
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	





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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)]	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)]	Yes	

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 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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General Services Administration			For period covering October 1, 2022 to September 30, 2023			
Plan to Attain Essential Elements						
PART H.1						
Part G Measure:	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.					
Brief Description of Program Deficiency:	GSA's five-year Strategic Plan references both externally-facing and internally-facing Diversity, Equity, Inclusion, and Accessibility (DEIA) principles; however, EEO principles are included only in GSA's separate DEIA Strategic Plan.					
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
05/15/21	09/30/26	N/A	N/A	Incorporate EEO principles into the next revision of the agency strategic plan.		
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
09/30/26	Incorporate EEO principles into relevant sections of the next revision to the GSA Strategic Plan. Engage with the Office of Chief Financial Officer (OCFO) periodically for possible opportunities to add EEO principles to the plan as part of earlier interim revisions.			Yes	N/A	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					
2023	In May, 2023, OCR provided OCFO with prospective interim edits to update the language to the GSA Strategic Plan, should an earlier opportunity arise.					

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General Services Administration		For period covering October 1, 2022 to September 30, 2023		
Plan to Attain Essential Elements				
PART H.2				
Part G Measure:		<p>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.</p> <p>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)]</p> <p>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)]</p>		
Brief Description of Program Deficiency:		<p>This corrective plan addresses <i>employee data</i> 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). <i>Applicant flow data</i> shortfalls are addressed under Part H plan H.11 and <i>training data</i> shortfalls are addressed under Part H plan H.5. Along with applicant flow data and training data shortfalls, 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 FY23 employee data shortfalls include accuracy and completeness of data on employee race, national origin, sex, disability status, appointment authority, latest appointment date, temporary/permanent status, and excepted/competitive service categorization of Schedule A(u) appointments and conversions.</p>		
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	09/30/24	N/A	Attain and maintain effective systems to accurately collect, monitor, and analyze employee data in accordance with MD-715 requirements, through sufficient funding, staffing, training, procedures, and systems. Improve monitoring and maintenance of employee data to ensure critical data elements are validated and complete at the end of each fiscal year, in order 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?		
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	N/A	N/A
05/08/24	OCR and OHRM to collaborate to identify and document the root cause(s) of each employee data shortfall.	Yes	N/A	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	N/A	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	N/A	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			

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General Services Administration		For period covering October 1, 2022 to September 30, 2023				
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 FY23. Out of forty harassment allegations, thirty-five (87.5%) 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	9/30/24	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	N/A	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					
2023	OHRM and OCR worked collaboratively during FY23 and made significant progress regarding the capture, maintenance, monitoring, and sharing of data on allegations of harassment, resolving the previous deficiencies in Part G measure E.4.a.6 (systems to accurately collect, monitor, and analyze the processing of complaints for the anti-harassment program) and measure B.4.a.1 (resources required to conduct a self-assessment of the agency for possible deficiencies).					

EEOC FORM 715-02 PART H		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
General Services Administration			For period covering October 1, 2022 to September 30, 2023		
Plan to Attain Essential Elements					
PART H.4					
Part G Measure:		<p>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.</p> <p>B.4.e.10: Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]</p>			
Brief Description of Program Deficiency:		<p>This Part H plan addresses both Part G measure C.2.b.5 (timely processing of accommodation requests) and measure B.4.a.10 (funding and qualified staffing to effectively manage the reasonable accommodation program). In FY23, GSA did not process all reasonable accommodation requests within the timeframe set forth in its reasonable accommodation procedures. Out of 203 FY23 requests for disability-related reasonable accommodations, 174 (86%) were timely processed. Twenty-three requests (11%) were untimely decided and six (3%) were untimely provided after approval. <i>[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.]</i></p>			
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	09/30/24	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 FY23 instances where either (a) requests for disability-related reasonable accommodations were untimely denied or (b) approved accommodations were untimely provided. Identify all involved parties who may have contributed to unnecessary delays (e.g., requestor, LRAC, Deciding Official, and/or OGC), identify resource shortfalls (if any), develop strategies (e.g., training) to help avoid or mitigate those issues in the future, and initiate implementation as soon as practicable.	Yes	N/A	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	N/A	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2023	Significant improvements were made to the collection, management, sharing, and use of data on requests for disability-related reasonable accommodations. Those improvements not only resolved Part G measure E.4.a.6 (systems to accurately collect, monitor, and analyze processing of requests for reasonable accommodation) and measure B.4.a.1 (resources required to conduct a self-assessment of the agency for possible deficiencies), but they also contributed directly to a significant reduction in untimely processing (under measure C.2.b.5). In addition, new capability was added to begin tracking the time required to <i>provide</i> approved accommodations (a Part J measure of effectiveness). A planned future improvement is to add proactive mechanisms for determining if provided accommodations were effective.			

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Plan to Attain Essential Elements				
PART H.5				
Part G Measure:	C.4.c: Does the EEO office have timely access to accurate and complete data (e.g., 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 Part H corrective plan is focused only on <i>training program data</i> related to mentoring. <i>Workforce/employee data</i> and <i>applicant flow data</i> deficiencies are addressed under other Part H plans (e.g., Part H plan H.2 for measures B.4.a.7, E.4.a.2, and C.4.c for <i>employee data</i> and Part H plan H.11 measures E.4.a.4 and C.4.c for <i>applicant flow data</i>). GSA does not currently track agency-wide statistics on opportunities associated with mentoring programs; however, some services or staff offices and/or functional communities offer independent mentoring programs that are not reported or managed at the agency level.			
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	N/A	N/A	Capture and maintain statistics that identify applicants and selectees for all GSA mentoring programs that require competition and/or supervisory recommendation and/or approval to participate. Include applicable agency-level mentoring programs, sub-organization (e.g., SSO-level) programs, and programs within functional communities (e.g., acquisition, contracting, information technology), if any. Manage the data so that fiscal year statistics can be compiled and made available by October 30 each year for analysis and reporting.
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
05/15/24	OCR and OHRM to collaborate to identify agency-level and sub-organizational mentoring programs that require competition and/or supervisory recommendation and/or approval to participate.	Yes	N/A	N/A
06/19/24	OCR and OHRM to collaborate to develop and begin implementing procedures to standardize capture, maintenance, and year-end sharing of applicant and selectee statistics for mentoring programs that require competition and/or supervisory recommendation and/or approval to participate.	Yes	N/A	N/A

Report of Accomplishments	
Fiscal Year	Accomplishments
2023	Significant progress was made in FY23 to the training data available for Affirmative Employment Program analyses. Data on internal details, temporary promotions, job-shadowing experiences, and part-time project opportunities was made available, supplementing the previous data on external Competitive Development Programs, and partially resolving data shortfalls affecting MD-715 Part J reporting and analysis requirements.

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Plan to Attain Essential Elements				
PART H.6				
Part G Measure:	C.4.e.1: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]			
Brief Description of Program Deficiency:	<p>Collaboration between the EEO and HR offices on development and implementation of the AAP for PWD is a FY24 priority. FY23 collaboration efforts instead first prioritized resolution of several critical data deficiencies affecting barrier analysis/elimination and the Affirmative Action Plan for PWD (e.g., data on employees, applicants, reasonable accommodations, harassment, grievances, details, temporary promotions, disciplinary actions, exit surveys, performance ratings, self-identification, and Schedule A(u) hires/conversions).</p> <p>This Part H corrective plan addresses Part G measures C.4.e.1 (collaboration on the AAP for PWD), C.4.e.2 (recruitment initiatives <i>related to PWD</i>), and D.4.b (encouraging PWD to apply to vacancies), and contributes to resolution of measures D.4.d (increasing the numbers of PWD/PWTD in the agency) and C.4.e.5 (collaboration on MD-715 reporting).</p>			
Objective(s) and Dates for EEO Plan to Attain Essential Elements				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
01/12/22	07/29/22	10/31/24	N/A	Conduct regular collaborative OCR and OHRM meetings to develop and implement plans to improve recruitment, hiring, advancement, and retention of PWD.
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?
02/29/24	February 2024 OCR and OHRM meeting to collaborate on developing and implementing plans designed to improve the recruitment and hiring of PWD and PWTD and address both (1) MD-715 Part J Section III requirements and (2) Disabled Veterans Affirmative Action Program (DVAAP) requirements related to recruitment and employment of disabled veterans. Collaborative meetings in each topic area to be held at least bi-monthly, beginning in February 2024.			Yes
				Date Modified
				Date Completed
				02/15/24

03/29/24	March 2024 OCR and OHRM meeting to collaborate on developing and implementing plans designed to improve advancement and retention of PWD and PWTD and address both (1) MD-715 Part J Section IV requirements and (2) DVAAP requirements related to advancement of disabled veterans. Collaborative meetings to be held at least bi-monthly, beginning in March 2024.	Yes	N/A	N/A
04/30/24	April 2024 OCR and OHRM meeting to collaborate on developing and implementing plans designed to improve the recruitment and hiring of PWD and PWTD and address both (1) MD-715 Part J Section III requirements and (2) DVAAP requirements related to recruitment.	Yes	N/A	N/A
05/31/24	May 2024 OCR and OHRM meeting to collaborate on developing and implementing plans designed to improve advancement and retention of PWD and PWTD and address both (1) MD-715 Part J Section IV requirements and (2) DVAAP requirements related to advancement of disabled veterans.	Yes	N/A	N/A
06/28/24	June 2024 OCR and OHRM meeting to collaborate on developing and implementing plans designed to improve the recruitment and hiring of PWD and PWTD and address both (1) MD-715 Part J Section III requirements and (2) DVAAP requirements related to recruitment.	Yes	N/A	N/A
07/31/24	July 2024 OCR and OHRM meeting to collaborate on developing and implementing plans designed to improve advancement and retention of PWD and PWTD and address both (1) MD-715 Part J Section IV requirements and (2) DVAAP requirements related to advancement of disabled veterans.	Yes	N/A	N/A
08/30/24	August 2024 OCR and OHRM meeting to collaborate on developing and implementing plans designed to improve the recruitment and hiring of PWD and PWTD and address both (1) MD-715 Part J Section III requirements and (2) DVAAP requirements related to recruitment.	Yes	N/A	N/A
10/31/24	October 2024 OCR and OHRM meeting to collaborate on <i>fulfilling reporting requirements</i> related to the recruitment, hiring, advancement, and retention of PWD and PWTD, <i>in preparation for submission of the 2024 Annual Agency EEO Program Status Report and 2024 Agency Disabled Veterans Affirmative Action Program Annual Report.</i>	Yes	N/A	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2023	GSA developed procedures to improve management, tracking, and reporting of employees appointed under the Schedule A(u) authority for individuals with intellectual disabilities, severe physical disabilities, or psychiatric disabilities. Among other intended outcomes, the procedures will address an identified barrier associated with untimely conversion of eligible Schedule A(u) employees from the excepted service to the competitive service and conversion of temporary excepted service employees to permanent excepted service, when applicable.			

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Plan to Attain Essential Elements						
PART H.7						
Part G Measure:	C.4.e.2: Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to develop and/or conduct outreach and recruiting initiatives? [see MD- 715, II(C)]					
Brief Description of Program Deficiency:	Collaboration between the EEO and HR offices on development and implementation of recruitment initiatives is a FY24 priority. FY23 collaboration instead first prioritized resolution of several critical data deficiencies affecting barrier analysis/elimination and the Affirmative Action Plan for PWD (e.g., data on employees, applicants, reasonable accommodations, harassment, grievances, details, temporary promotions, disciplinary actions, exit surveys, performance ratings, self-identification, & Schedule A(u) hires/conversions). This Part H plan addresses portions of Part G measure C.4.e.2 (collaboration on recruitment initiatives <i>not</i> related to PWD) and measure E.4.a.3 (procedures and systems for collecting/monitoring/analyzing recruiting data), and complements PWD-specific recruitment efforts under measures C.4.e.1 , conducted in pursuit of AAP and DVAAP goals.					
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	10/31/24	N/A	OCR and OHRM to collaborate regularly on recruitment initiatives and ensure coordination between the AEP and OHRM's Federal Equal Opportunity Recruitment Program (FEORP).		
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
06/30/22	April 2024 OCR and OHRM meeting to collaborate on development and implementation of (1) recruitment plans and (2) systems for tracking recruitment activities, in order to support barrier analysis efforts in accordance with MD-715 and FEORP requirements under 5 USC § 7201. Collaborative OCR and OHRM meetings to be held at least bi-monthly, beginning in April 2024.			Yes	4/30/24	N/A

06/28/24	June 2024 OCR and OHRM meeting to collaborate on development and implementation of (1) recruitment plans and (2) systems for tracking recruitment activities, in order to support barrier analysis efforts in accordance with MD-715 and FEORP requirements under 5 USC § 7201.	Yes	N/A	N/A
07/31/24	July 2024 OCR and OHRM meeting to collaborate on development of <i>content required to support submission of the Annual Federal Equal Opportunity Recruitment Program Report and Hispanic Employment Report to OPM.</i>	Yes	N/A	N/A
08/30/24	August 2024 OCR and OHRM meeting to collaborate on development and implementation of (1) recruitment plans and (2) systems for tracking recruitment activities, in order to support barrier analysis efforts in accordance with MD-715 and FEORP requirements under 5 USC § 7201.	Yes	N/A	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			

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Plan to Attain Essential Elements						
PART H.8						
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 a FY24 priority. FY23 collaboration efforts instead first prioritized resolution of several critical data deficiencies that affect both barrier analysis and elimination (e.g., data on employees, applicants, reasonable accommodations, harassment, grievances, details, temporary promotions, disciplinary actions, exit surveys, performance ratings, self-identification, & Schedule A(u) hires/conversions). This Part H corrective plan addresses measures C.4.e.4 (collaboration on identifying/removing barriers), B.4.a.2 (barrier analysis resources), and D.3.b (barrier elimination), and contributes to C.4.e.1 (implementation of the AAP for PWD) through systematic elimination of four barriers primarily affecting PWD, as well as C.4.e.5 (collaboration on MD-715 reporting).				
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	09/30/24	N/A	OCR/OHRM to collaborate to identify and investigate potential barriers and to 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 analysis, and eliminate barriers. SMEs to meet at least monthly in pursuit of those efforts and also quarterly to provide briefings to Responsible Officials on the status and progress of barrier identification and elimination efforts, provide recommendations for future efforts, obtain strategic direction, and identify new resource and support requirements, if any. First meeting to be held in March 2024, upon completion of the FY23 MD-715 report.			Yes	N/A	N/A

04/24/24	April 2024 collaboration meeting between relevant OCR and OHRM SMEs to (1) identify potential barriers; (2) prioritize, develop, and implement root cause analysis plans; (3) develop and implement barrier elimination plans; (4) identify additional resources or other support required, if any, to conduct effective analyses and/or eliminate barriers; and (5) jointly track progress on planned activities, including efforts to eliminate all barriers identified in the most recent MD-715 report.	Yes	N/A	N/A
04/30/24	Joint quarterly briefing for Responsible Officials by OCR and OHRM SMEs on the status and progress of root cause analyses, relevant findings (including identified barriers and analysis obstacles, if any), as well as recommendations on future barrier investigations. In addition, briefing to include status and progress on development and implementation of Affirmative Action Plans to recruit, hire, advance, and retain PWD.	Yes	N/A	N/A
05/31/24	May 2024 collaboration meeting between relevant OCR and OHRM SMEs to (1) identify potential barriers; (2) prioritize, develop, and implement root cause analysis plans; (3) develop and implement barrier elimination plans; (4) identify additional resources or other support required, if any, to conduct effective analyses and/or eliminate barriers; and (5) jointly track progress on planned activities, including efforts to eliminate all barriers identified in the most recent MD-715 report.	Yes	N/A	N/A
06/28/24	June 2024 collaboration meeting between relevant OCR and OHRM SMEs to (1) identify potential barriers; (2) prioritize, develop, and implement root cause analysis plans; (3) develop and implement barrier elimination plans; (4) identify additional resources or other support required, if any, to conduct effective analyses and/or eliminate barriers; and (5) jointly track progress on planned activities, including efforts to eliminate all barriers identified in the most recent MD-715 report.	Yes	N/A	N/A
07/24/24	July 2024 collaboration meeting between relevant OCR and OHRM SMEs to (1) identify potential barriers; (2) prioritize, develop, and implement root cause analysis plans; (3) develop and implement barrier elimination plans; (4) identify additional resources or other support required, if any, to conduct effective analyses and/or eliminate barriers; and (5) jointly track progress on planned activities, including efforts to eliminate all barriers identified in the most recent MD-715 report.	Yes	N/A	N/A

07/31/24	Joint quarterly briefing for Responsible Officials by OCR and OHRM SMEs on the status and progress of root cause analyses, relevant findings (including identified barriers and analysis obstacles, if any), as well as recommendations on future barrier investigations. In addition, briefing to include status and progress on development and implementation of Affirmative Action Plans to recruit, hire, advance, and retain PWD.	Yes	N/A	N/A
08/30/24	August 2024 collaboration meeting between relevant OCR and OHRM SMEs to (1) identify potential barriers; (2) prioritize, develop, and implement root cause analysis plans; (3) develop and implement barrier elimination plans; (4) identify additional resources or other support required, if any, to conduct effective analyses and/or eliminate barriers; and (5) jointly track progress on planned activities, including efforts to eliminate all barriers identified in the most recent MD-715 report.	Yes	N/A	N/A
09/30/24	September 2024 collaboration meeting between relevant OCR and OHRM SMEs to (1) identify potential barriers; (2) prioritize, develop, and implement root cause analysis plans; (3) develop and implement barrier elimination plans; (4) identify additional resources or other support required, if any, to conduct effective analyses and/or eliminate barriers; and (5) jointly track progress on planned activities, including efforts to eliminate all barriers identified in the most recent MD-715 report.	Yes	N/A	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2023	Significant improvements were made regarding collection and sharing of data to be analyzed in support of agency affirmative employment obligations, enabling broader and more effective trigger identification and root cause analyses.			

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PART H.9						
Part G Measure:		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)]				
Brief Description of Program Deficiency:		GSA's agency-level exit survey does not currently contain questions on how the agency could improve, hiring, inclusion, retention, and advance of individuals with disabilities.				
Objective(s) and Dates for EEO Plan to Attain Essential Elements						
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description		
10/01/18	09/30/21	07/01/24	N/A	Incorporate questions into the GSA exit survey on how GSA can improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.		
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
09/30/21	OCR and OHRM to collaborate on new exit survey content and modification of the GSA Exit Survey.			Yes	07/01/24	N/A
Report of Accomplishments						
Fiscal Year	Accomplishments					
2023	A general question was added to the GSA Exit Survey to improve understanding about the extent that unlawful discrimination and/or harassment may have influenced employee decisions to leave the agency.					
2024	OCR and OHRM developed draft survey language and a plan to modify the GSA Exit Survey prior to release of the 3 rd Quarter (July 1, 2024) version of the survey.					

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PART H.10				
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 94 EEO complaints counseled in FY23, 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	N/A	08/23/23	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?
04/30/24	Identify root cause for untimely processing and develop mitigation strategy (e.g., refresher training).			Yes
				Date Modified
				Date Completed
				08/23/23
Report of Accomplishments				
Fiscal Year	Accomplishments			
2023	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.			

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Plan to Attain Essential Elements						
PART H.11						
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 <i>applicant flow data</i> shortfalls identified under Part G measures E.4.a.4 (covering procedures and systems) and B.4.a.7 (covering funding, staffing, and training). <i>Employee data</i> 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 FY23 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	N/A	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?		
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
04/10/24	OCR and OHRM to collaborate to identify (1) all applicant flow data required to support recurring annual MD-715 analysis and reporting obligations, (2) respective GSA applicant flow data capabilities and limitations, and (3) current completeness and accuracy shortfalls, including but not limited to items listed in the deficiency statement.			Yes	N/A	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	N/A	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	N/A	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.			
Report of Accomplishments				
Fiscal Year	Accomplishments			
2023	GSA increased top-down communications from senior leadership about the importance of capturing data on interviewed applicants, leading to mid-year improvements to the volume of data on interview statistics being captured in Monster Analytics. Additionally, OHRM began development of training and updated procedures to further improve the capture of statistics on interviewed applicants.			

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?		Hispanic or Latino Males and Hispanic or Latino Females both exhibit lower than expected participation in General Schedule (GS) grade levels GS-12 and higher				
<i>BARRIER GROUPS:</i>		Hispanic or Latino Males and Hispanic or Latino Females				
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					
FY23	See Part E Workforce Analysis for descriptions of investigative activities undertaken as part of FY23 barrier analysis efforts.					

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 FY17 through FY23
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY18 through FY23.
Grievance Data	Yes	Grievance data for FY23.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	Yes	Anti-harassment data from FY23.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA FEVS results from 2022 and 2023; OPM Government-wide Management Report – 2023 FEVS Results.
Exit Interview Data	Yes	Exit interview data was not available to support analyses; however, data on 2019-2023 exit surveys was analyzed.
Focus Groups	No	Focus group discussions were attempted through SEPM contacts; however, no constituents volunteered to meet.
Interviews	Yes	Information about workforce trends and demographic focus areas relevant to multiple individual GSA regions, offices, and programs.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC Federal Workforce Report for 2019 (released 2022); EEOC report on Hispanics in the American Workforce; Bureau of Labor Statistics reports on labor force characteristics, by race/ethnicity, education, and citizenship; Pew Research Center – Who is Hispanic, September 15, 2022; MSPB Report – Achieving a Representative Federal Workforce Addressing the Barriers to Hispanic Participation (undated)
Other - Career Development Program Data	Yes	Data for CDPs, details, temporary promotions, and part-time projects in FY23
Other - Special Emphasis Program (SEP) Information		Meetings with Hispanic Employment Program Special Emphasis Program Managers to identify triggers and areas of interest for barrier investigations.
Other	Yes	Information on stalled career ladders, intersectionality with overdue Schedule A(u) conversions, and grade-level-specific promotion potential of top 20 most populous GSA occupational series.

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General Services Administration			For period covering October 1, 2021 to September 30, 2022			
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 and applicant flow 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?		Significant differences in employment outcomes and key participation rates between demographic groups, particularly illustrated by differences between White Females and Black or African American Males.				
BARRIER GROUPS:		Hispanic or Latino Males and Hispanic or Latino Females, Black or African American Males, and Black or African American Females				
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					
	See Part E Workforce Analysis for descriptions of investigative activities undertaken as part of FY23 barrier analysis efforts.					

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 FY17 through FY23.
Complaint Data/Trends	Yes	Annual Federal EEO Statistical Reports of Discrimination Complaints for FY18 thru FY23.
Grievance Data	Yes	Grievance data for FY23.
Findings from Decisions (e.g., EEO, MSPB, Grievance, Anti-Harassment Processes)	Yes	Anti-harassment data for FY23.
Climate Assessment Survey (e.g., FEVS)	Yes	GSA FEVS results from 2022 and 2023; OPM Government-wide Management Report – 2023 FEVS Results.
Exit Interview Data	Yes	Exit interview data was not available to support analyses; however, data on 2019-2023 exit surveys was analyzed.
Focus Groups	No	Focus groups are planned for FY24.
Interviews	No	GSA does not currently capture, maintain, or analyze data on interviewed applicants.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	MSPB Research Brief, Direct Hire Authority Under 5 U.S.C. § 3304: Usage and Outcomes, February 2021; GAO Report to Congressional Committees, Federal Hiring – OPM Needs to Improve Management and Oversight of Hiring Authorities, August 2016; OPM Memo on Implementing Regulation for Government-wide Direct-Hire Authority for Certain Federal Acquisition Positions, August 5, 2005; OCHCO bulletins; MSPB Report to the President and Congress, Merit System Principles: Guiding the Fair and Effective Management of the Federal workforce, September 26, 2016; MSPB Report – Merit System Principles – Keys to Managing the Federal Workforce, October, 2020.
Other – GSA Order HRM 9332.2, June 9, 2022	Yes	Information on direct hire authority for STEM occupations
Other - Career Development Program Data	Yes	Data for Competitive Development Programs (CDPs) from FY19 thru FY23; data on details, temporary promotions, and part-time projects for FY23. Data on mentoring to be added in FY24.
Other - Special Emphasis Program (SEP) Information	Yes	Meetings with Special Emphasis Programs and affinity groups to identify triggers and areas of interest for barrier investigations.

MD-715 – Part J

Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their 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 (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 | <input checked="" type="radio"/> No |
| b. Cluster GS-11 to SES (PWD) | Yes | <input checked="" type="radio"/> No |

Answer: GSA is fully compliant 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 | <input checked="" type="radio"/> No |
| c. Cluster GS-11 to SES (PWTD) | Yes | <input checked="" type="radio"/> No |

Answer: GSA is fully compliant in this measure.

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

Answer: In March 2023, GSA developed procedures governing conversions of eligible Schedule A(u) hires. Training provided to Office of Human Resources Management

(OHRM) employees on the new procedures highlighted the GSA's participation goals for PWD and PWTD, which exceed the respective Federal goals by 50%. In addition, the training was recorded and will be added to the GSA Online University. As part of agency efforts to improve use of Schedule A(u) and more timely conversions of Schedule A(u) hires, OHRM intends to make the training mandatory for all supervisors beginning in 2024.

Section II: Model Disability Program

Pursuant to 29 C.F.R. §1614.203(d)(1), agencies must ensure sufficient staff, training, and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Yes

No

Answer: Prior to FY23, a significant number of deficiencies were identified (many of which affect the disability program) and four barriers were identified (all of which affect the disability program). In FY23, personnel resources could not simultaneously address all identified deficiencies and barriers. Thus, while support for the disability program increased in FY23, the personnel who would normally implement the “steady state” disability program needed to first focus on resolution of those deficiencies and barriers. As such, development and implementation of GSA's Affirmative Action Plan for PWD did not receive as much attention in FY23 as desired; however, the corrective efforts of related staff did result in notable progress in many areas that directly impact PWD (e.g., significant improvements related to Reasonable Accommodations and Schedule A(u)). Planned FY24 corrective efforts (including implementation of the AAP for PWD and further improvements to disability-related reasonable accommodations, Schedule A(u), and coordination between the AEP, DVAAP, and SPP) are addressed in multiple Part H corrective plans.

2. Identify all staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and responsible official.

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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	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Answering questions from the public about hiring authorities that take disability into account			1	Lance Green Special Placement Program Coordinator lance.green@gsa.gov
Section 508 Compliance			23	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			3	John Bagwell & Hayden Shock, Co-SEPMs john.bagwell@gsa.gov hayden.shock@gsa.gov
Processing reasonable accommodation requests from applicants and employees	20			Emily Claybrook Reasonable Accommodation Coordinator emily.plank@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) to make further improvements to processing timeliness. Separately, training is planned in FY24 for supervisors regarding use of the Schedule A(u) authority.

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

Answer: One notable accomplishment related to funding of disability program efforts is that in FY23, the Office of Human Resources Management created an American Sign Language (ASL) interpreter contract, with centralized funding, to assist deaf and hard of hearing employees gain improved accessibility to enterprise-wide events, meetings, and trainings. During FY24, one planned area of analysis of funding resources relates to funding for disability-related outreach and recruitment efforts.

Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD.

A. PLAN TO IDENTIFY JOB 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: GSA utilizes OPM's Shared Register of Candidates with Disabilities and the Workforce Recruitment Program (WRP). Additionally, GSA's entry-level consolidated recruitment program conducted both in-person and virtual outreach to a variety of PWD/PWTD-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 uses 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. The SPPC also provides guidance through the application process and answers questions from applicants, employees, and hiring managers relating to the hiring of PWD.

2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

Answer: Collectively, GSA's current employees were appointed using a total of 94 different

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authorities. Of those, there are eight 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 veteran from Veterans Affairs program) and there are two additional authorities (Veterans' Recruitment Appointments (VRA) and Veterans Employment Opportunity Act (VEOA)) that may take disability into account, but may also be used to appoint individuals without disabilities. Overall, 638 employees have been appointed by authorities that always take disability into account; however, of those, only 441 (69%) identify as having a disability. Discounting Schedule A(u) appointments and conversions, 201 employees have been appointed by authorities that always take disability into account, but only 76 (38%) identify as having a disability. With respect to the VRA and VEOA authorities, of 584 appointments, only 119 (20%) identify as having a disability; however, 273 VRA and VEOA appointees (47%) have either Veterans Preference Code (VPC) 04 or 06, which, by definition, indicate a service-connected disability. Overall, approximately 900 GSA employees who have VPC 04 or 06 are not identified in the system of record as having a disability, and of those, approximately half are identified as having no 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 widely not used as targeted recruitment tool. The agency's Merit Promotion announcements specifically include the USAJOBS Hiring Path for "Individuals With Disabilities" to identify that 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 Department of Labor's Workforce Recruitment Program to supplement entry-level hiring efforts.

Analysis of the most-used appointment authorities during FY22 and FY23 identified 13 authorities that account for 90% of all appointments. Of those top authorities, WUM (Schedule A(u)) and LZM (Conversion of 30% or More Disabled Veterans) were the 7th and 11th most used, respectively, accounting for 7% of appointments during FY22 and FY23; however, of appointments under those authorities, 18% do *not* identify as having a disability. Determining and addressing the root causes for low self-identification of disability status is a high priority.

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, some of which include topics related to hiring authorities, including Schedule A(u). All managers and supervisors were compliant with this requirement in FY23. Additional training is planned for FY24 to educate hiring managers about new Schedule A(u) procedures.

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: The GSA National Recruitment Center maintains regularly updated lists of candidate sourcing options that include 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.

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- | | | |
|---|-----|--------------------------|
| a. New Hires for Permanent Workforce (PWD) | Yes | <input type="radio"/> No |
| b. New Hires for Permanent Workforce (PWTD) | Yes | <input type="radio"/> No |

Answer: No triggers exist in this measurement area.

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) | <input checked="" type="radio"/> Yes | No |
| b. New Hires for MCO (PWTD) | <input checked="" type="radio"/> Yes | No |

Answer: Some mission-critical occupations have triggers related to differences between relevant applicant pools and applicants and/or between qualified applicants and selectees; however, meaningful analyses of these issues are negatively impacted by extremely low rates of self-identification. In FY23, only 4.7% of applicants self-identified their disability status.

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) | <input checked="" type="radio"/> Yes | No |
| b. Qualified Applicants for MCO (PWTD) | <input checked="" type="radio"/> Yes | No |

Answer: Some mission-critical occupations have triggers related to differences between relevant applicant pools and applicants and/or between qualified applicants and selectees; however, meaningful analyses of these issues are negatively impacted by extremely low rates of self-identification. In FY23, only 4.7% of applicants self-identified their disability status.

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) | <input checked="" type="radio"/> Yes | No |
| b. Promotions for MCO (PWTD) | <input checked="" type="radio"/> Yes | No |

Answer: Some mission-critical occupations have triggers related to differences between relevant applicant pools and applicants and/or between qualified applicants and selectees; however, meaningful analyses of these issues are negatively impacted by extremely low rates of self-identification. In FY23, only 4.7% of applicants self-identified their disability status.

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 various Competitive Development Programs (CDPs). In FY23, GSA made improvements to data tracking and analysis related to additional internal career development opportunities advertised through the GSA Opportunity Network, a developmental program that offers a variety of temporary opportunities to GSA's workforce, 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 FY23, analysis of GSA's top 20 most populous occupational series identified eleven occupational series with relatively high percentages of their respective positions at the GS14 level or higher (including four series with 50% or more of their positions at the GS14 level or higher and seven with between 25% and 50%), as well as nine occupational series that had inherently lower advancement opportunities (including five series with between 5% and 25% of positions at GS14 or higher and four occupations with fewer than 5% of positions at GS14 or higher). Two of the top twenty series have no positions above GS13. PWD were found to have higher than expected participation in six of the seven most

populous occupations with the lowest percentage of positions at GS14 or higher.

In FY24, GSA plans to (1) conduct further root cause analysis into advancement opportunities and (2) begin capturing and analyzing data on mentoring programs offered by particular GSA Services or Staff Offices and/or related to specific functional communities (e.g., acquisition program management). To develop the mandatory MD-715 data tables, statistics for career development programs are consolidated by grade level eligibility into the seven categories tracked by MD-715 (e.g., GS-13, GS-14, GS-15, and SES; as well as Supervisors, Managers, and Executives).

B. CAREER DEVELOPMENT OPPORTUNITIES

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

Answer: GSA provides career development opportunities for all eligible employees (not just PWD) through both external and internal programs. “Competitive Development Programs” 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 FY23 CDPs included 15 grade-specific courses from 9 major sources, including (1) eCornell (Leadership Essentials and Intrapreneurship), (2) Eisenhower School National Defense University, (3) OPM Federal Executive Institute (FEI) Leadership for a Democratic Society, (4) Graduate School USA (Executive Leadership Program and Executive Potential Program), (5) Harvard Kennedy School (Senior Executive Fellows Program and Leadership Decision-Making Online Program), (6) OPM President’s Management Council Interagency Rotation Program, (7) Partnership for Public Service (Foundations in Public Service Leadership Program, Excellence in Government Fellows Program, Leadership Excellence in Acquisition Program, and Preparing to Lead Program), (8) College of Information and Cyberspace National Defense University, and (9) White House 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 include (1) GSA Start Program, (2) Targeted Leadership

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Development Program, (3) Mentoring Program, (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. 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

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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	121	69	25.62	24.64	2.48	1.45
Training Programs	102	33	32.35	27.27	5.00	3.03
Internship Programs	1940	130	3.87	3.08	2.53	1.54
Fellowship Programs	40	23	15.00	8.70	0.00	0.00
Mentoring Programs	Mentoring program is not centrally managed. No data available.					
Coaching Programs	Coaching does not require competition or supervisor approval.					
Detail Programs	218	59	27.98	28.81	7.29	3.85

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3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees). If “yes”, describe the trigger(s) in the text box.

- | | | |
|---------------------|--------------------------------------|----|
| a. Applicants (PWD) | <input checked="" type="radio"/> Yes | No |
| b. Selections (PWD) | <input checked="" type="radio"/> Yes | No |

Answer: PWD have higher participation rates among applicants than selectees for all career development programs, except details.

4. Do triggers exist for PWTD 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) | <input checked="" type="radio"/> Yes | No |
| b. Selections (PWTD) | <input checked="" type="radio"/> Yes | No |

Answer: PWTD have higher participation rates among applicants than selectees for all career development programs.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|---|--------------------------------------|----|
| a. Awards, Bonuses, & Incentives (PWD) | <input checked="" type="radio"/> Yes | No |
| b. Awards, Bonuses, & Incentives (PWTD) | <input checked="" type="radio"/> Yes | No |

Answer: Yes; there are triggers for PWD and PWTD in time-off awards between 11 hours and 40 hours. With respect to cash awards, there are triggers of both PWD and PWTD in all categories, except \$1000-\$1999 for both PWD and PWTD.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|------------------------|--------------------------------------|----|
| a. Pay Increases (PWD) | <input checked="" type="radio"/> Yes | No |
|------------------------|--------------------------------------|----|

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b. Pay Increases (PWTD) Yes No

Answer: Both PWD and PWTD received Quality Step Increases (QSI) at a lower rate than persons without disabilities.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD)	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	No
ii. Internal Selections (PWD)	Yes	No	No
b. GS-15			
i. Qualified Internal Applicants (PWD)	Yes	No	No
ii. Internal Selections (PWD)	Yes	No	No
c. GS-14			
i. Qualified Internal Applicants (PWD)	Yes	No	No
ii. Internal Selections (PWD)	Yes	No	No
d. GS-13			
i. Qualified Internal Applicants (PWD)	Yes	No	No
ii. Internal Selections (PWD)	Yes	No	No

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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. In FY23, 4.7% of applicants self-identified their disability status.

2. Does your agency have a trigger involving PWTB 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 (PWTB) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWTB) | Yes | <input type="radio"/> No |
| b. GS-15 | | |
| i. Qualified Internal Applicants (PWTB) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWTB) | <input checked="" type="radio"/> Yes | No |
| c. GS-14 | | |
| i. Qualified Internal Applicants (PWTB) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWTB) | <input checked="" type="radio"/> Yes | No |
| d. GS-13 | | |
| i. Qualified Internal Applicants (PWTB) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWTB) | <input checked="" type="radio"/> 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. In FY23, 4.7% of applicants self-identified their disability status.

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

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box.

- | | | |
|-----------------------------|--------------------------------------|--------------------------|
| a. New Hires to SES (PWD) | Yes | <input type="radio"/> No |
| b. New Hires to GS-15 (PWD) | <input checked="" type="radio"/> Yes | No |
| c. New Hires to GS-14 (PWD) | <input checked="" type="radio"/> Yes | No |
| d. New Hires to GS-13 (PWD) | <input checked="" type="radio"/> 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. In FY23, 4.7% of applicants self-identified their disability status.

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 | <input type="radio"/> No |
| b. New Hires to GS-15 (PWTD) | Yes | <input type="radio"/> No |
| c. New Hires to GS-14 (PWTD) | Yes | <input type="radio"/> No |
| d. New Hires to GS-13 (PWTD) | <input checked="" type="radio"/> 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. In FY23, 4.7% of applicants self-identified their disability status.

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

- | | | |
|--|--------------------------------------|--------------------------|
| a. Executives | | |
| i. Qualified Internal Applicants (PWD) | Yes | <input type="radio"/> No |
| ii. Internal Selections (PWD) | <input checked="" type="radio"/> Yes | No |
| b. Managers | | |
| i. Qualified Internal Applicants (PWD) | Yes | <input type="radio"/> No |

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ii. Internal Selections (PWD) Yes No

c. Supervisors

i. Qualified Internal Applicants (PWD) Yes No
 ii. Internal Selections (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. In FY23, 4.7% of applicants self-identified their disability status.

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. In FY23, 4.7% of applicants self-identified their disability status.

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

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- | | | |
|-----------------------------------|--------------------------------------|----|
| a. New Hires to Executives (PWD) | <input checked="" type="radio"/> Yes | No |
| b. New Hires to Managers (PWD) | <input checked="" type="radio"/> Yes | No |
| c. New Hires to Supervisors (PWD) | <input checked="" type="radio"/> 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. In FY23, 4.7% of applicants self-identified their disability status.

8. 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 (PWTD) | Yes | <input checked="" type="radio"/> No |
| b. New Hires to Managers (PWTD) | Yes | <input checked="" type="radio"/> No |
| c. New Hires to Supervisors (PWTD) | <input checked="" type="radio"/> 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. In FY23, 4.7% of applicants self-identified their disability status.

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: In FY23, OHRM launched efforts (1) to determine if identified employees meet

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the requirements to be converted, (2) to convert eligible employees (beginning with the most recently eligible employees), and (3) to implement reminders to notify managers so that timely conversion can occur. New procedures were developed and implemented in FY23 and conversions of all Schedule A(u) employees who are currently overdue are planned to be completed in FY24.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD)	<input checked="" type="radio"/> Yes	<input type="radio"/> No
b. Involuntary Separations (PWD)	<input checked="" type="radio"/> Yes	<input type="radio"/> No

Answer: The percentage of PWD among both voluntary and involuntary separations exceeded those of persons without disabilities.

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWTD)	<input type="radio"/> Yes	<input checked="" type="radio"/> No
b. Involuntary Separations (PWTD)	<input checked="" type="radio"/> Yes	<input type="radio"/> No

Answer: The percentage of PWTD among involuntary separations 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: GSA does not conduct exit interviews and does not use an exit survey that includes questions on how the agency can improve recruitment, hiring, advancement, inclusion, or retention of PWD or PWTD. Some subcomponents use exit surveys and/or an independent exit interview process; however, the results of those efforts are not centrally managed or reported to the GSA Central Office for compiling and reporting. Plan Part H.9 addresses resolution of the deficient exit survey language. Analysis of 620 exit survey narratives from 2019 through 2023 found only a few responses related to unfavorable perceptions about accessibility or reasonable accommodation, some of which could not be reconciled with data from the reasonable accommodations system (e.g., the exit survey complained about a lack of accommodation; however, there is no

record of the request for disability-related reasonable accommodation within the reasonable accommodations system).

In addition to evaluating exit survey results, GSA also planned in FY22 to obtain a more complete picture of potential reasons for employee separations by correlating relevant data between systems; however, data relating to reasonable accommodations and allegations of harassment was incomplete, and did not include requested data elements necessary to correlate statistics with EEO complaints and employee separation data.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 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(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

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

Answer: Information on rights associated with Section 508 of the Rehabilitation Act is at <https://www.gsa.gov/website-information/accessibility-statement>. Information on how to file a Section 508 complaint is 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>) and can be accessed by applicants at www.gsa.gov by searching for the term "508 complaint."

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

Answer: Information on rights associated with the Architectural Barriers Act (ABA) is on the public site <https://www.gsa.gov/real-estate/design-construction/accessible-facility-design>, which includes a link to the GSA Accessibility Desk Guide and information on how to file ABA complaints through the U.S. Access Board via their publicly accessible online complaint form (<https://www.access-board.gov/enforcement/>).

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

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 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 the GSA DEIA Strategic Plan with the Executive Order 14035 through the National Accessibility Program.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period.

Answer: The average time to provide approval or denial of FY23 requests for reasonable accommodation was 16.7 days and the average time to provide approved accommodations was 5.2 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: Significant improvements were made to the reasonable accommodations system during FY23, including major reductions in untimely processing and introduction of new data elements to track timeliness of providing approved accommodations. Overall, 11% of FY23 requests were untimely decided and 3% were untimely provided, which is a significant improvement over FY20 through FY22, when 38% were untimely decided, and no data was captured to determine how long it took to provide approved accommodations.

FY24 plans include developing potential mechanisms to follow up on approved accommodations, to determine if provided accommodations were effective. Planned improvements to the reasonable accommodations program are addressed in plan Part H.4.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

Answer: GSA had no requests for personal assistance services in FY23.

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: One complaint alleging harassment based on disability and retaliation resulted in a finding. Corrective measures included \$50,000 in nonpecuniary damages, \$160,414.50

in backpay, and \$30,196.80 in attorney's fees, as well as reinstatement to a position within the agency and expungement of adverse material from complainant's Official Personnel File. Seven complaints alleging harassment based on disability status resulted in settlements. In FY23, EEOC calculated the government-wide average for formal complaints filed by PWD alleging harassment as 23.12%.

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: No complaints alleging failure to provide a reasonable accommodation resulted in findings. One complaint alleging reasonable accommodation as an issue resulted in a settlement. In FY23, EEOC calculated the government-wide average for formal complaints filed by PWD alleging failure to accommodate as 13.79%.

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?

Yes No

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

Yes No

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.

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General Services Administration		For period covering October 1, 2022 to September 30, 2023		
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 FY20 thru FY23 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 203 FY23 requests for disability-related reasonable accommodations, 174 (86%) were timely processed. Twenty-three requests (11%) were untimely decided and six (3%) were untimely provided after approval.			
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	09/30/24	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 by the agency).
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?
04/19/24	Identify root causes for FY23 instances where either (a) requests for disability-related reasonable accommodations were untimely denied or (b) approved 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 (if any), develop strategies (e.g., training) to help avoid or mitigate those issues in the future, and initiate implementation as soon as practicable.			Yes
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
				N/A
				N/A

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Report of Accomplishments	
Fiscal Year	Accomplishments
2023	<p>Significant improvements were made to the collection, management, sharing, and use of data on requests for disability-related reasonable accommodations. Those improvements not only resolved Part G measure E.4.a.6 (systems to accurately collect, monitor, and analyze processing of requests for reasonable accommodation) and measure B.4.a.1 (resources required to conduct a self-assessment of the agency for possible deficiencies), but also contributed directly to a significant reduction in untimely processing (under measure C.2.b.5), as well as added new capability to track the time required to provide approved accommodations (a Part J measure of effectiveness).</p>

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General Services Administration		For period covering October 1, 2022 to September 30, 2023		
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:	<p>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. More than 40 eligible employees are overdue for conversion.</p> <p>Employees appointed under the Schedule A(u) appointment authority (5 CFR § 213.3102(u)) are appointed to the <i>Excepted Service</i> (without regard to temporary or permanent status).</p> <p>An agency <i>may</i> noncompetitively convert to the <i>Competitive Service</i> an employee who has completed 2 years of satisfactory service under this authority in accordance with the provisions of Executive Order 12125, as amended by Executive Order 13124.*</p> <p>*Unless the employee is in a temporary appointment <u>because the work is of a temporary nature</u> (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).</p>			
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	09/30/24	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

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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	09/30/24	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	N/A	N/A
Report of Accomplishments				
Fiscal Year	Accomplishments			
2023	In March, 2023, GSA established guidelines for hiring candidates with disabilities under the excepted service authority, 5 CFR § 213.3102(u), regarding persons with intellectual disabilities, severe physical disabilities, or psychiatric disabilities.			

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General Services Administration		For period covering October 1, 2022 to September 30, 2023		
Plan to Eliminate Barriers Affecting PWD/PWTD				
PART J.3				
Barrier Title:	Implementation of the Affirmative Action Plan for PWD			
Affected Group(s):	Persons with Disabilities Persons with Targeted Disabilities			
Statement of Identified Barrier:	Insufficient implementation of the Affirmative Action Plan for PWD was identified as an overarching barrier affecting aspects of recruitment, hiring, advancement, and retention of PWD. Similarly, shortfalls in coordination between the DVAAP, SPP, and Affirmative Action Plan for PWD also affect opportunities for PWD.			
Objective(s) and Dates for EEO Plan to Eliminate Barriers Affecting PWD/PWTD				
Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
N/A	N/A	N/A	N/A	Elimination of this barrier is addressed in Part H corrective plan H.6.
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
	See Part H corrective plan H.6			
Report of Accomplishments				
Fiscal Year	Accomplishments			

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General Services Administration		For period covering October 1, 2022 to September 30, 2023		
Plan to Eliminate Barriers Affecting PWD/PWTD				
PART J.4				
Barrier Title:	Employees in Temporary Status for Extended Durations			
Affected Group(s):	Persons with Disabilities Persons with Targeted Disabilities			
Statement of Identified Barrier:	Insufficient implementation of the Affirmative Action Plan for PWD was identified as an overarching barrier affecting aspects of recruitment, hiring, advancement, and retention of PWD. Similarly, shortfalls in coordination between the DVAAP, SPP, and Affirmative Action Plan for PWD also affect opportunities for 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	09/30/24	N/A	(1) Ensure that the temporary or permanent status indicators for all employees are correct. (2) Ensure that all employees do not remain in temporary status 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 <i>the applicant on the job to determine whether the applicant is able or ready to perform the duties of the position</i>) 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	N/A	N/A
06/12/24	OCR and OHRM to meet to analyze current employee data for employees currently in non-permanent status in HRLinks to identify (1) Schedule A(u) employees with appointment authority codes WTA, WTB, WTM, and WUM; (2) former Schedule A(u) employees converted to the Competitive service under appointment authority code L1M; and (3) former Schedule A(u) employees converted in FY22 or later to the Competitive service under any appointment	Yes	N/A	N/A

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	<p>authority code other than L1M. For non-permanent employees in authorities WTA, WTB, WTM, and WUM, identify whether they are in temporary 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 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)). For all employees in the latter category, determine if they are now eligible for conversion to permanent status in the Excepted service.</p>			
Report of Accomplishments				
Fiscal Year	Accomplishments			

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4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Answer: Significant progress was made in FY23 on the barriers related to reasonable accommodations and Schedule A(u), and the progress made on Schedule A(u) will have secondary benefits to the barrier related to employees in temporary status. The barrier in which the least apparent progress was made was implementation of the AAP for PWD; however, the reasons for that progress were primarily related to extensive efforts that were made during FY23 to address critical deficiencies that impact barrier analysis, the disability program, and the AAP for PWD. Now that the majority of those deficiencies have been resolved, further progress on eliminating the four barriers is now a primary FY24 focus area.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s)

Answer: Major efforts in reasonable accommodations lead to significant reduction of processing times of requests for reasonable accommodations, as well as major improvement to data capture, monitoring, and sharing. With respect to Schedule A(u), efforts resulted in new procedures, agency-wide communications about use of Schedule A(u) and management obligations and plans relating to timely conversions of Schedule A(u) employees.

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: All plans are still active, and will be modified as necessary to address new information.



The Administrator

July 11, 2023

MEMORANDUM FOR ALL GSA EMPLOYEES

FROM: ROBIN CARNAHAN *Robin Carnahan*
ADMINISTRATOR (A)

SUBJECT: Annual Agency Equal Employment Opportunity Policy Statement

GSA strives to attract, develop, and retain the best employees from across the nation and provide an inclusive environment in which all are able to contribute to their full potential. Providing equal employment opportunity (EEO) for all is critical to that effort.

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, free from discrimination or harassment based on any protected basis.

GSA's policy is to afford employees and applicants for employment equal opportunities. Therefore, GSA does not tolerate discrimination or harassment based on race, color, religion, sex, pregnancy, gender identity, sexual orientation, national origin, age, disability, genetic information (including family medical history), or reprisal for protected EEO activity. EEO protections pertain to all GSA personnel and employment programs, as well as 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. Accordingly, GSA will not permit reprisal against anyone who engages in protected EEO activity (e.g., reporting discrimination or harassment, participating in the EEO process, or requesting a reasonable accommodation for a disability or for religious purposes).

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 unlawfully discriminated against or harassed another as defined by law may be subject to corrective action up to and including removal.

Employees or applicants who believe they have been unlawfully discriminated against and wish to initiate an EEO complaint may contact GSA's Office of Civil Rights (OCR) at eeo@gsa.gov or (202) 501-4571. Additional information is available 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

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official in their supervisory chain, or an Anti-Harassment Coordinator. See GSA Order HRM 9700.6 CHGE 2 for more information.

Ensuring equality of employment opportunity is not only a legal requirement, but it is also foundational to achieving administration and agency diversity, equity, inclusion, and accessibility (DEIA) goals and to making GSA an employer of choice. Please join me in demonstrating commitment to integrating EEO and DEIA principles into all we do.

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Acronyms

2F	Two or More Races Female
2M	Two or More Races Male
AANAPI	Asian American and Native American Pacific Islander-Serving Institution
AAP	Affirmative Action Plan
ABA	Architectural Barriers Act
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
ASL	American Sign Language
AYM	OPM Code for direct hire authority under 5 U.S.C. § 337.201
BF	Black or African American Female
BIG	Blacks in Government
BM	Black or African American Male
CA	Contract Appeals Pay Plan Code
CART	Communication Access Realtime Translation
CDP	Competitive Development Program
CHCO	Chief Human Capital Officer
C.F.R.	Code of Federal Regulations
CLF	Civilian Labor Force
COVID-19	Coronavirus Disease of 2019
D&I	Diversity and Inclusion
DEIA	Diversity, Equity, Inclusion, and Accessibility
DVAAP	Disabled Veterans Affirmative Action Program
ECQ	Executive Core Qualifications
EI	Employee Engagement Index
EELP	Enterprise Emerging Leaders Program
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
ERG	Employee Resource Group
ES	Senior Executive Service Pay Plan Code
EX	Executive Schedule Pay Plan Code
FAS	Federal Acquisition Service

FEDSEP Federal Sector EEO Portal
 FEI Federal Executive Institute
 FEMA Federal Emergency Management Agency
 FEORP Federal Equal Opportunity Recruitment Program
 FEVS Federal Employee Viewpoint Survey
 FEW Federally Employed Women
 FIPS Federal Information Processing Standard
 FWP Federal Women’s Program [See WSEP]
 FY Fiscal Year
 GAO Government Accountability Office
 GS General Schedule Pay Plan Code
 GSA U.S. General Services Administration
 HBCU Historically Black Colleges and Universities
 HEP Hispanic Employment Program (SEP)
 HF Hispanic or Latino Female
 HM Hispanic or Latino Male
 HR Human Resources
 HRM Human Resources Manual
 HSI Hispanic-Serving Institution
 ICTAP Interagency Career Transition Assistance Plan
 IDEA Inclusion, Diversity, Equity, and Accessibility [Champions Program]
 IDP Individual Development Program
 IF American Indian or Alaska Native (AIAN) Female
 IM American Indian or Alaska Native (AIAN) Male
 IR Inclusion Rate
 IT Information Technology
 LGB Lesbian, Gay, or Bisexual (but not Transgender)
 LGBTQ+ Lesbian, Gay, Bisexual, Transexual, Queer/Questioning, and Others
 LRAC Local Reasonable Accommodations Coordinator
 MCO Mission-Critical Occupation
 MD-715 Management Directive 715
 MSI Minority-Serving Institution
 MSPB Merit Systems Protection Board
 NASA National Aeronautics and Space Administration
 NAVWAR Naval Information Warfare Systems Command
 NCLF National Civilian Labor Force
 NF Native Hawaiian or Other Pacific Islander (NHOPI) Female
 NHOPI Native Hawaiian or Other Pacific Islander
 NM Native Hawaiian or Other Pacific Islander (NHOPI) Male
 NOAC Nature of Action Code

No FEAR ActNotification and Federal Employee Antidiscrimination and Retaliation Act
 OCHCOOffice of the Chief Human Capital Officer
 OCLFOccupational Civilian Labor Force
 OCR..... Office of Civil Rights
 OHRM.....Office of Human Resources Management
 OIGOffice of Inspector General
 OMBOffice of Management and Budget
 OPMOffice of Personnel Management
 PASPersonal Assistance Services
 PBSPublic Building Service
 PIIPersonally Identifiable Information
 PTSDPost-Traumatic Stress Disorder
 PUMP ActProviding Urgent Maternal Protections For Nursing Mothers Act
 PWDPersons with Disabilities
 PWDPPersons with Disabilities Program (SEP)
 PWoDPersons without Disabilities
 PWTBPersons with Targeted Disabilities
 QSIQuality Step Increase
 RAReasonable Accommodation
 SEPSpecial Emphasis Program
 SEPMSpecial Emphasis Program Manager
 SESSenior Executive Service
 SFStandard Form
 SLSenior Level Pay Plan Code
 SME.....Subject Matter Expert
 SPPSelective Placement Program
 SPPC.....Selective Placement Program Coordinator
 STEM.....Scientific, Technical, Engineering, and Mathematics
 TCUTribal Colleges and Universities
 U.S.C.United States Code
 VA..... [U.S. Department of] Veterans Affairs
 VEOA.....Veterans Employment Opportunity Act of 1998
 VPCVeterans Preference Code
 VR&E.....Veteran Readiness and Employment
 VRAVeterans' Recruitment Appointment
 WGWage Grade Pay Plan Code
 WLWage Leader Pay Plan Code
 WRPWorkforce Recruitment Program
 WS.....Wage Supervisor Pay Plan Code
 WSEPWomen's Special Emphasis Program