

**NATIONAL AERONAUTICS AND SPACE
ADMINISTRATION (NASA)
MODEL EQUAL EMPLOYMENT OPPORTUNITY
PROGRAM STATUS REPORT: FY 2022**

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NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA)
MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM STATUS REPORT:
FY 2022

Table of Contents

Parts A-D: Agency Information	1
Part E: Executive Summary	3
Section I. Agency Mission and Leadership	3
Section II. The Six Essential Elements of a Model EEO Program	3
Demonstrated Commitment of Agency Leadership	4
Integration of EEO into the Agency’s Strategic Mission	4
Management and Program Accountability.....	4
Proactive Prevention of Unlawful Discrimination	5
Efficiency	6
Responsiveness and Legal Compliance.....	6
Section III. Workforce Analyses.....	6
Section IV. FY 2022 Model EEO Program Accomplishments	8
Section V. FY 2023 Planned Activities	8
Part F: Certification of Establishment of Continuing EEO Programs	11
Part G: Agency Self-Assessment Checklist – FY 2022	13
Part H: Essential Element Deficiencies and Planned Activities.....	25
Part I: Barrier Analysis and Planned Activities	30
Part J: Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities	36
Section I: Efforts to Reach Regulatory Goals	36
Section II: Model Disability Program.....	37
A. Plan to Provide Sufficient and Competent Staffing for the Disability Program.....	37
B. Plan to Ensure Sufficient Funding for the Disability Program	38
Section III: Plan to Recruit and Hire Individuals with Disabilities	38
A. Plan to Identify Job Applicants with Disabilities.....	38
B. Plan to Establish Contacts with Disability Employment Organizations	40
C. Progression Towards Goals (Recruitment and Hiring)	41

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities	41
A. Advancement Program Plan	41
B. Career Development Opportunities	42
C. Awards	43
D. Promotions	44
Section V: Plan to Improve Retention of Persons with Disabilities	47
A. Voluntary and Involuntary Separations.....	47
B. Accessibility of Technology and Facilities	48
C. Reasonable Accommodation Program	49
D. Personal Assistance Services Allowing Employees to Participate in the Workplace	50
Section VI: EEO Complaint and Findings Data.....	50
A. EEO Complaint Data Involving Harassment.....	50
B. EEO Complaint Data Involving Reasonable Accommodation.....	51
Section VII: Identification and Removal of Barriers	51
Appendix A: Data Analyses	54
Workforce Summary	54
External Benchmarks	54
Internal Benchmark	55
Occupational Categories	58
Individuals with Disabilities.....	60
Federal Employee Viewpoint Survey (FEVS) Results	61
Appendix B: Physical Science Barrier Analysis Plan and Initial Findings.....	63
Appendix C: Documents Required by EEOC.....	69
Appendix D: List of Frequently Used Acronyms.....	70

PARTS A-D: AGENCY INFORMATION

MD-715 PART A - D	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT				
For period covering October 1, 2021, to September 30, 2022					
PART A Department or Agency Identifying Information	Agency	National Aeronautics and Space Administration			
	Address	300 E Street, SW			
	City, State, Zip Code	Washington, DC 20546			
	CPDF Code	NN00			
	FIPS code(s)	01, 06, 11, 12, 22, 24, 28, 39, 48, 51			
PART B Total Employment	Permanent Workforce	16,878			
	Temporary Workforce	1,321			
	TOTAL EMPLOYMENT	18,199			
PART C1 Head of Agency	Leadership	Name	Title		
	Head of Agency	Bill Nelson	Administrator		
PART C2 Agency Official(s) Responsible for Oversight of EEO Programs	EEO Program Staff	Name/Title	Occupational Series/Pay Plan and Grade	Phone Number	Email Address
	Principal EEO Director/Official	Stephen T. Shih, Associate Administrator, Office of Diversity and Equal Opportunity (ODEO)	0260/SES	(202) 358- 2167	stephen.t.shih @nasa.gov
	Affirmative Employment Program Manager	James Yamanaka, Director Diversity and Data/Analytics Division	0301/SES	(202) 358- 2167	james.k.yamanaka@ nasa.gov
	Complaint Processing Program Manager	Eric Atilano, Equal Employment Manager	0260-/GS-15	(202) 358- 2684	eric.atilano@nasa.gov
	Diversity & Inclusion Officer	Nicole Lassiter, Equal Opportunity Specialist	0260/GS-15	(202) 358- 1932	nicole.e.lassiter @nasa.gov
	Hispanic Program Manager (SEPM)	Nicole Lassiter, Equal Opportunity Specialist	0260/GS-15	(202) 358- 1932	nicole.e.lassiter @nasa.gov
	Women's Program Manager (SEPM)	Nicole Lassiter, Equal Opportunity Specialist	0260/GS-15	(202) 358- 1932	nicole.e.lassiter @nasa.gov
	Disability Program Manager (SEPM)	Rebecca Doroshenk, Program Analyst	0343/GS-14	(202) 358- 0038	Rebecca.d.doroshenk @nasa.gov
	Selective Placement Program Coordinator (Individuals w/Disabilities)	Esteban Morales, Human Resources Specialist	0201/GS-14	(301) 286- 3093	Esteban.morales @nasa.gov
	Reasonable Accommodation Program Manager	Rebecca Doroshenk, Program Analyst	0343/GS-14	(202) 358- 0038	Rebecca.d.doroshenk @nasa.gov
	Anti-Harassment Program Manager	Previous: Randy Poynter, Equal Employment Manager	0260/GS-15	(202) 880- 5205	randy.g.poynter@ nasa.gov

		Current: Aleas Hammett, Equal Employment Manager	0260/GS-14	(202) 880- 5205	aleas.n.hammett@nasa.gov
	ADR Program Manager	Randy Poynter, Equal Employment Manager	0260/GS-15	(202) 880- 5205	randy.g.poynter@nasa.gov
	Compliance Manager	Eric Atilano, Equal Employment Manager	026-/GS-15	(202) 358- 2684	eric.atilano@nasa.gov
	Principal MD-715 Preparer	Rebecca Kraus, Civil Rights Analyst	0160/GS-15	(202) 358- 2303	rebecca.s.kraus@nasa.gov
PART D-1 List of Subordinate Components Covered in This Report	Subordinate Component and Location (City/State)		CPDF and FIPS codes		
	Ames Research Center (ARC), Moffett Field/CA		NN21	06001, 06003, 06005, 06013, 06085, 06087	
	Armstrong Flight Research Center (AFRC), Edwards/CA		NN24	06029, 06037	
	Glenn Research Center (GRC), Cleveland/OH		NN22	39035, 39055, 39143, 39153, 39085, 39093	
	Goddard Space Flight Center (GSFC), Greenbelt/MD		NN51	24033, 24031, 24027, 24003, 11001, 51001	
	Headquarters (HQ), Washington/DC		NN10	11001, 24033, 24031, 51013, 51059, 51107	
	Johnson Space Center (JSC), Houston/TX		NN72	48157, 48167, 48291, 48473, 48071	
	Kennedy Space Center (KSC), KSC/FL		NN76	12009, 12095	
	Langley Research Center (LaRC), Hampton/VA		NN23	51115, 51650, 51700	
	Marshall Space Flight Center (MSFC), Huntsville/AL		NN62	01089	
	NASA Shared Services Center (NSSC), Stennis/MS		NN10	28045, 28047, 28059	
Stennis Space Center (SSC), Stennis/MS		NN64	28045, 28047, 28059		
PART D-2 Mandatory and Optional Documents for this Report	See Appendix C.				

PART E: EXECUTIVE SUMMARY

MD-715 PART E	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
National Aeronautics and Space Administration	For period covering October 1, 2021, to September 30, 2022	
EXECUTIVE SUMMARY		
<p data-bbox="167 579 786 617"><i>Section I. Agency Mission and Leadership</i></p> <p data-bbox="167 663 1474 1003">The National Aeronautics and Space Administration’s (NASA) mission is to explore the unknown in air and space, innovate for the benefit of humanity, and inspire the world through discovery. As stated in the <i>NASA 2022 Strategic Plan</i>, “NASA inspires the world through exploration and discovery, leading scientific and technological advancements that benefit Americans and all humanity. Our efforts in space help to further the national economy, including through innovative commercial partnerships with American businesses. With the increasing threat of climate change, NASA’s efforts to study and understand the Earth are of critical global significance. In addition, NASA’s partnerships with academic institutions support a robust Science, Technology, Engineering, and Mathematics (STEM) workforce and promote diversity, equity, and inclusion in the fields of science and technology.”</p> <p data-bbox="167 1052 1474 1392">For an unprecedented 11th consecutive year, NASA was named the 2022 Best Place to Work in the Federal Government among large agencies by the Partnership for Public Service. NASA was also ranked among America’s Best Employers for Diversity by <i>Forbes</i>.¹ With top-level support from the NASA Administrator and leadership team, NASA and its Office of Diversity and Equal Opportunity (ODEO) engaged in significant activities to advance diversity, equity, inclusion, and accessibility (DEIA) throughout the Agency. NASA measures the success of its Equal Employment Opportunity (EEO) program against the six Essential Elements of a Model EEO Program, as outlined by the U.S. Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715). Fiscal Year (FY) 2022 program accomplishments and DEIA successes are identified and discussed below.</p> <p data-bbox="167 1451 1094 1488"><i>Section II. The Six Essential Elements of a Model EEO Program</i></p> <p data-bbox="167 1535 1474 1717">NASA carefully examined its current EEO program status and compared it to the Model EEO Program Self-Assessment measures (Part G). Of the 157 measures, NASA identified three deficiencies within its program, reflecting a compliance rate of 98 percent. Utilizing the results of the self-assessment, the Agency developed plans to address program deficiencies (Part H) and workforce triggers regarding participation rates for certain groups in the workforce (Parts I and J).</p>		

¹ Jared Council, editor, “America’s Best Employers for Diversity: 2022,” *Forbes*, April 26, 2022, accessed at <<http://www.forbes.com/lists/best-employers-diversity/?sh=5615895f6468>>.

Demonstrated Commitment of Agency Leadership

Throughout FY 2022, Agency leadership continued to demonstrate their commitment to DEIA and EEO through a variety of means. For instance, on January 18, 2022, Administrator Bill Nelson reissued NASA's annual DEIA policy statement. The statement emphasizes NASA's commitment to DEIA, including the following priorities: reinforcing a culture in which our employees feel they can be authentic, welcomed, respected, included, and engaged; maintaining an environment where employees consistently and systematically receive fair, just, and impartial treatment; and ensuring our employees can fully and independently access facilities, information and communication technology, programs, and services. This policy statement covers all aspects of DEIA, including equal employment opportunity, anti-harassment, and reasonable accommodation (RA), as required by EEOC and Executive Orders issued by the Administration.

Throughout the year, the Administrator, Deputy Administrator, Associate Administrator, and other NASA leaders prioritized discussions with employees and employee resource groups (ERGs) and advocated for their inclusion in the development of DEIA policies and initiatives. Leadership at the NASA Center-level also support EEO And DEIA initiatives. For example, all NASA Centers have each established a DEIA Council comprised of Center senior leaders and representatives of offices across each Center, and senior leaders at NASA Centers continue to participate as champions and/or members of ERGs. Leaders also participated in a variety of special emphasis programs and outreach events (e.g., the Center Directors of Glenn Research Center (GRC), Johnson Space Center (JSC), Kennedy Space Center (JSC), and Marshall Space Flight Center (MSFC) participated in the American Astronautical Society's annual Von Braun Space Symposium).

Integration of EEO into the Agency's Strategic Mission

NASA continues to ensure that EEO and DEIA are integrated into all aspects of its work, from its scientific missions to recruitment and development of its employees. In August 2022, NASA issued its DEIA Strategic Plan which provides a roadmap to help the Agency continue to empower its employees to share their unique experiences and skills for the betterment of the agency, while actively supporting individual progress and development. This plan will ensure NASA can accomplish goals that support Executive Order 14035, "Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce," and inspire others to join the NASA family.

Management and Program Accountability

NASA regularly reports on EEO and DEIA performance outcomes at several Agency governance councils, including the NASA Executive Council and the Mission Support Performance Management Council. In addition, the Associate Administrator (AA) for ODEO is a full and active member of NASA's senior leadership team and regularly participates on various decision-making bodies, boards, panels, and councils, such as: the Senior Management Council, the Agency's senior decision-making body for strategic direction and planning; the Mission Support Council, the Agency's senior decision-making body regarding the integrated mission support portfolio; the Performance Review Board, which conducts annual performance reviews of NASA's Senior Executive Service (SES) members; and the

Executive Resources Board, which provides advice, counsel, and recommendations for consideration by the Administrator relating to the management of executive human resources.

Throughout FY 2022, NASA continued to refine its EEO and DEIA reporting capabilities, including providing reports to NASA Centers on the diversity of their workforces and conducting a detailed barrier analysis of physical scientist positions. Although NASA collects applicant flow data and has analyzed it for previous MD-715 reports, those data are not yet available for FY 2022. This is due to NASA's adoption of a new staffing solution in 2021, updates to the system implemented by Office of Personnel Management (OPM) in 2022, and the lag time needed to develop the applicant flow data tables within the new environment.

Proactive Prevention of Unlawful Discrimination

In support of recent DEIA Executive Orders, NASA:

- Published revised Guidance for Supporting Gender Transition/Affirmation in the Workplace (January 2022);
- Submitted a Gender Equity and Equality Action Plan to the White House Gender Policy Council (July 2022); and
- Issued its DEIA Strategic Plan (August 2022) and initiated the development of Center, Mission Directorate, and Lead Mission Support Office implementation plans (due in December 2022).

Further, throughout FY 2022, NASA organized numerous cultural awareness events during special observance months to educate the workforce. NASA also encourages participation in the Agency's more than 60 ERGs, which play a vital role in NASA's retention and development efforts. NASA Centers and organizations also initiated several activities aimed at proactive prevention of discrimination and enhancing DEIA:

- All NASA Centers displayed the Progress Pride Flag at their Centers for LGBTQIA+ Pride Month for the first time.
- The Ames Research Center (ARC) Associate Director is heading a Workplace Diversity Pipeline initiative, which is focused on reducing underrepresentation in the pipeline from pre-vacancy to hire. The initiative is comprised of several elements, including: supervisor access to diversity metrics; increased recruiting at Minority Serving Institutions (MSI); required diversity and unconscious bias training for hiring managers, interviewers, and selection officials; and the elevation of DEIA culture to the same level as safety culture.
- The GRC Director ensured that accessibility improvements of GRC facilities continued during FY 2022. These improvements included road work to smooth streets, curb cutouts, truncated domes for sidewalks, and reserved parking spots for individuals with disabilities (IWD). GRC also established an additional gender-neutral restroom, bringing the total to 41.

- Goddard Space Flight Center (GSFC) sponsors a Diversity Dialogue Project (DDP), a facilitated dialogue program that brings small groups of employees together in an open, non-judgmental, and safe environment to discuss differences based on the many dimensions of diversity that impact the workplace. The DDP has become the Center’s foundational D&I learning experience, with participation of employees and supervisors across several GSFC campuses. In FY 22, a virtual cross campus DDP 101 session was held, featuring participation from each of GSFC’s campuses. Preliminary survey analyses indicate success toward continuing both the virtual and the cross-campus aspects.
- NASA Headquarters (HQ) leadership identified two spaces to be designated for multifaith usage; these rooms will allow employees to have dedicated spaces to practice their faith, commune with others, and meet religious obligations without feeling the need to take leave and increase the ability of inclusive connection.

Efficiency

On September 9, 2022, NASA awarded the first-ever Agency-wide Sign Language Interpretation (SLI) Blanket Purchasing Agreement (BPA). The SLI BPA will enable consistency in the services NASA provides to its deaf and hard-of-hearing employees, interns, applicants, and guests – no matter the individual’s geographical location within the Agency. In addition, NASA continues to improve its data analytics capability and to obtain data needed to efficiently and consistently monitor workforce demographics and conduct barrier analyses. In FY 2022, NASA issued a statement of work for contractor support to build data pipelines to obtain additional data for DEIA and MD-715 analytics. The contractor will build data dashboards and applications that will improve personnel and other data analytics capabilities across the Agency.

Responsiveness and Legal Compliance

In FY 2022, NASA posted timely No FEAR Act data, met established deadlines for submitting the FY 2021 MD-715 report, and submitted a timely Annual Statistical Report of Discrimination Complaints (EEOC Form 462) to EEOC. In addition, NASA emphasizes a broad application of anti-harassment policy and procedures through its Agency Anti-Harassment Program (AHP), taking the Agency beyond legal compliance and focusing on workforce and mission. In FY 2022, NASA received 38 reports of harassment under the AHP, with an average processing time of 48 days, compared to 64 days in FY 2021. NASA continues to train the workforce with its award-winning, on-line “gamified” anti-harassment training.

Section III. Workforce Analyses

To attract and retain a diverse workforce, NASA works to ensure equal opportunity in all aspects of its human capital management, including recruitment, hiring, promotions, awards, etc. NASA monitors workforce composition data to determine if discrepancies exist in the participation rate of

any demographic group.² The FY 2022 workforce composition data revealed the following triggers (see Appendix A, Table 2):

- NASA Senior Executive Service (SES) members: Asian Americans and Pacific Islanders (AAPI) and Hispanics account for a lower percentage of the SES compared to their overall representation in the NASA workforce.
- Senior Level (SL) and Senior Scientific and Professional (ST) employees: Blacks, Hispanics, and Women make up a smaller proportion of both SL and ST positions than their overall representation in the workforce. AAPI employees are underrepresented in SL positions.
- GS-14 through GS-15 and Supervisory positions: Women are underrepresented in GS-14 through GS-15 positions, accounting for 30.6 percent of the employees in those grades (compared to their overall representation in the NASA workforce of 34.9 percent). AAPI and Hispanic employees are underrepresented in supervisory positions.

Triggers also exist with regard to specific occupations when compared to the Relevant Civilian Labor Force (RCLF) (see Appendix A, Tables 3-4).³ For example, Women account for 32.6 percent of NASA Physical Scientists (job series 1301) yet are 43.4 percent of Physical Scientists in the RCLF. Similarly, AAPI make up 14.1 percent of Physical Scientists at NASA, but account for 16.4 percent of such positions in the RCLF. As noted in Part I of this report, NASA initiated a barrier analysis for Physical Science positions, the findings of which appear in Appendix B.

In contrast, AAPI, Blacks, Hispanics, and Women represent a greater proportion of those occupying several Professional Administrative positions at NASA when compared to the RCLF (see Appendix A, Table 4). For example:

- AAPI employees are 12.8 percent of NASA Accountants, compared to 8.6 percent of Accountants in the RCLF.
- Black employees are employed at a rate approximately three times their representation in the RCLF in Contract Specialist and Accountant positions. Blacks

² A “snapshot” of the NASA workforce can reveal “triggers” for various groups at certain grade levels and in leadership positions when compared to: their total representation at NASA; the Federal STEM workforce; and the U.S. civilian labor force (see Appendix A, Table 1). As defined by EEOC, a trigger is a situation that alerts the Agency to the possible existence of a barrier to EEO. For example, low participation (or representation) of a group in certain occupations, or among employees receiving promotions, awards, etc., may indicate that there is an Agency policy or practice that limits the full participation of that group. A trigger does not by itself demonstrate a barrier to equal opportunity; it indicates an area to be monitored or further analyzed.

³ The RCLF measures individuals in the civilian labor force in occupations equivalent to occupations in the Federal Government. The Census Bureau defines the RCLF as “the Civilian Labor Force (CLF) data that are directly comparable (or relevant) to the population being considered in the labor force.” U.S. Census Bureau, “Equal Employment Opportunity Tabulation: FAQs,” accessed at <https://www.census.gov/topics/employment/equal-employment-opportunity-abulation/about/faq.html#par_textimage_514458183>.

account for 25.3 percent of NASA Contract Specialists and 31.1 percent of NASA Accountants, compared to 8.5 percent and 8.1 percent, respectively, in the RCLF.

- Hispanic employees are 11.9 percent of Management and Program Analysts, compared to 4.6 percent in the RCLF; 10.7 percent Contract Specialists, compared to 7.1 percent in the RCLF; and 8.7 percent of Accountants, compared to 6.1 percent in the RCLF.

NASA exceeds the Federal goals for the employment of IWD and individuals with targeted disabilities (IWTD) (see Part J). These goals are: (1) IWD should account for 12 percent of employees in grades GS-10 and below and 12 percent of employees in grades GS-11 and above, and (2) IWTD should account for two percent of employees in these grade categories. For grades GS-10 and below: IWD and IWTD account for 24.9 percent and 7.5 percent of the NASA employees in those grades, respectively. For grades GS-11 and above, IWD and IWTD are 13.7 percent and 2.7 percent of NASA employees in those grades. (See Appendix A, Figures 3-4.) The Agency will continue to monitor overall employment data on IWD and IWTD, with regard to recruitment, hiring, promotions, awards, and retention.

Section IV. FY 2022 Model EEO Program Accomplishments

In FY 2022, NASA corrected the two program deficiencies:

- *Ensure EEO investigations are completed timely, pursuant to 29 CFR §1614.108* (see Part H-4). The timeliness of investigations increased from 95 percent in FY 2021 to 100 percent in FY 2022. NASA will continue to closely monitor its investigations to ensure compliance with regulations.
- *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)* (see Part H-5). In FY 2022, NASA developed standard operating procedures for its complaints processing program and now issues 180-day letters on cases even when they will not be untimely.

Section V. FY 2023 Planned Activities

No new program deficiencies were identified in FY 2022; work continues on three deficiencies:

- *Revise Agency structure so that the AA, ODEO, reports directly to the NASA Administrator, pursuant to 29 CFR §1614.102(b)(4)* (see Part H-1). NASA continues to determine how to address this deficiency.
- *Conduct prompt inquiries of harassment allegations under the Anti-Harassment Program (beginning within ten days of notification)* (see Part H-2). In FY 2022, NASA embedded its Workplace Safety and Harassment Prevention and Response Plan into its DEIA Strategic Plan and identified the implementation of a NASA-wide Anti-Harassment Campaign as a key performance goal in the DEIA Strategic Plan. In FY 2022, NASA completed 62.1

percent of cases in a timely fashion compared to 56.7 percent in FY 2021. In FY 2023, NASA hired a dedicated Anti-Harassment and ADR Program Manager who will be responsible for initiating a new Anti-Harassment Campaign and delivering a training event for the Anti-Harassment Community of Practice focused on ensuring a victim-centered, trauma-informed approach.

- *Ensure EEO counseling is completed timely within 30 or 90 calendar days, pursuant to 29 CFR §1614.108 (see Part H-3).* FY 2022, NASA completed 95 percent of its counseling timely (compared to 89 percent in FY 2021). NASA will continue to review monthly complaint processing data to track compliance to regulatory requirements and will develop additional interventions, as necessary, to improve timeliness.

In addition, NASA continues to strengthen its data analytics capabilities and conduct barrier analyses regarding Women, AAPI, and IWD. NASA intends to initiate a barrier analysis regarding grade progression for women and minorities, given that an analysis of employees by grade revealed that the percentage of minorities and women decreases as grade levels increase (see Part I). NASA also will continue to address issues related to its disability program (see Part J).

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PART F: CERTIFICATION OF ESTABLISHMENT OF CONTINUING EEO PROGRAMS

MD-715 PART F	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT	
CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS		
I,	Elaine P. Ho, Associate Administrator for Diversity and Equal Opportunity/0260/SES	am the
Principal EEO Director/Official	(Insert name, official title/series/grade above)	
for:	National Aeronautics and Space Administration	
	(Insert Agency/Component Name)	
<p>The Agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD 715. If an essential element was not fully compliant with the standards of EEO MD 715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program are included with this Federal Agency Annual EEO Program Status Report.</p> <p>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.</p> <p>I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.</p>		
		8/22/2023
Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD 715.		Date
		5/16/2023
Signature of Agency Head or Agency Head Designee		Date

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PART G: AGENCY SELF-ASSESSMENT CHECKLIST – FY 2022

MD-715 PART G	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT		
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.			
A.1 – The agency issues an effective, up-to-date EEO policy statement.		Measure Met?	Comments
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? <i>If yes, provide the annual issuance date in the comments column.</i> [MD-715, II(A)]	Yes	NASA issued an updated EEO and DEIA policy statement on January 18, 2022.
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [29 CFR § 1614.101(a)]	Yes	
A.2 – The agency has communicated EEO policies and procedures to all employees.		Measure Met?	Comments
A.2.a	<i>Does the agency disseminate the following policies and procedures to all employees:</i>		
A.2.a.1	– Anti-harassment policy? [MD 715, II(A)]	Yes	
A.2.a.2	– Reasonable accommodation procedures? [29 CFR § 1614.203(d)(3)]	Yes	
A.2.b	<i>Does the agency prominently post the following information in the workplace and on its public Web site:</i>		
A.2.b.1	– Business contact information for its EEO Director EEO Counselors, EEO Officers, Special Emphasis Program Managers? [29 CFR § 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? [29 CFR § 1614.102(b)(5)]	Yes	
A.2.b.3	– Reasonable accommodation procedures? [29 CFR § 1614.203(d)(3)(i)] <i>If yes, provide the internet address in the comments column.</i>	Yes	https://nodis3.gsfc.nasa.gov/displayDir.cfm?t=NPR&c=3713&s=1C
A.2.c	<i>Does the agency inform its employees about the following:</i>		
A.2.c.1	– EEO complaint process? [29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] <i>If yes, provide how often.</i>	Yes	At least annually.
A.2.c.2	– ADR process? [MD-110, Ch. 3(II)(C)] <i>If yes, provide how often.</i>	Yes	At least annually.
A.2.c.3	– Reasonable accommodation program? [29 CFR § 1614.203(d)(7)(ii)(C)] <i>If yes, provide how often.</i>	Yes	At least annually.
A.2.c.4	– Anti-harassment program? [EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] <i>If yes, provide how often.</i>	Yes	At least annually.

A.2.c.5	– Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] <i>If yes, provide how often.</i>	Yes	At least annually.
A.3 – The agency assesses and ensures EEO principles are part of its culture.		Measure Met?	Comments
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [29 CFR § 1614.102(a) (9)] <i>If yes, provide one or two examples in the comments section.</i>	Yes	Examples: Agency Honor Awards – EEO Medal; Annual Robert H. Goddard Awards – Diversity/EEO Award; Ames EEO/Diversity Excellence Award; and KSC Diversity and Equal Opportunity Award.
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessments to monitor the perception of EEO principles within the workforce? [5 CFR Part 250]	Yes	
Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.			
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?	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? [29 CFR §1614.102(b)(4)]	No	The AA for ODEO formally reports to the Deputy Administrator and has regular access to the Administrator. See Part H-1.
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? <i>If yes, provide the title of the agency head designee in the comments.</i>	No	See Part H-1.
B.1.a.2	Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [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 agency’s EEO program? [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? [MD-715 Instructions, Sec. I)] <i>If yes, provide the date of the briefing in comments column.</i>	Yes	ODEO briefed the NASA Administrator on 9/27/2022 and presents updates throughout the year, including Baseline Performance Review and the Management Support Performance Management Council meetings.
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other related issues? [MD-715, II(B)]	Yes	
B.2 – The EEO Director controls all aspects of the EEO program.		Measure Met?	Comments

B.2.	<i>Is the EEO Director responsible for the following:</i>		
B.2.a	– The implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
B.2.b	– Overseeing the completion of EEO counseling? [29 CFR §1614.102(c)(4)]	Yes	
B.2.c	– Overseeing the fair and thorough investigation of EEO complaints? [29 CFR §1614.102(c)(5)]	Yes	
B.2.d	– Overseeing the timely issuance of final agency decisions? [29 CFR §1614.102(c)(5)]	Yes	
B.2.e	– Ensuring compliance with EEOC orders? [29 CFR §§ 1614.102(e); 1614.502]	Yes	
B.2.f	– Periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [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? [29 CFR §§ 1614.102(c)(2) and (c)(3)]	Yes	
B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.		Measure Met?	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? [MD-715, II(B)]	Yes	
B.3.b	Does the agency’s current strategic plan reference EEO/diversity and inclusion principles? [MD-715, II(B)] <i>If yes, identify the EEO principles in the strategic plan in the comments column.</i>	Yes	Strategic Objective 4.1: Attract and develop a talented and diverse workforce
B.4 - The agency has sufficient budget and staffing to support the success of its EEO program		Measure Met?	Comments
B.4.a	<i>Per 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:</i>		
B.4.a.1	– to conduct a self-assessment of the agency for possible program deficiencies? [MD-715, II(D)]	Yes	
B.4.a.2	– to enable the agency to conduct a thorough barrier analysis of its workforce? [MD-715, II(B)]	Yes	
B.4.a.3	– to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [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? [MD-715, II(B) and III(C)] <i>If not, identify the type(s) of training with insufficient funding in the comments section.</i>	Yes	
B.4.a.5	– to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [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)? [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? [MD-715, II(E)]. <i>If not, identify the systems with insufficient funding in the comments section.</i>	Yes	
B.4.a.8	– to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes	
B.4.a.9	– to effectively manage its anti-harassment program? [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? [29 CFR § 1614.203(d)(4)(ii)]	Yes	
B.4.a.11	– to ensure timely and complete compliance with EEOC orders? [MD-715, II(E)]	Yes	
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [29 CFR § 1614.102(a)(1)]	Yes	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [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	
B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.		Measure Met?	Comments
B.5.a	<i>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:</i>		
B.5.a.1	– EEO Complaint Process? [MD-715(II)(B)]	Yes	
B.5.a.2	– Reasonable Accommodation Procedures? [29 CFR § 1614.102(d)(3)]	Yes	
B.5.a.3	– Anti-Harassment Policy? [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? [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? [MD-715(II)(E)]	Yes	
B.6 – The agency involves managers in the implementation of its EEO program.		Measure Met?	Comments
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [MD-715 Instructions, Sec. I]	Yes	

B.6.b	Do senior managers participate in the barrier analysis process? [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)? [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? [29 CFR § 1614.102(a)(5)]	Yes	
Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.			
C.1 – The agency conducts regular internal audits of its component and field offices.		Measure Met?	Comments
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [29 CFR §1614.102(c)(2)] <i>If yes, provide the schedule for conducting audits in the comments section.</i>	Yes	Agency ODEO reviews Center MD-715 plans annually, provides technical assistance as needed, and periodically conducts functional reviews.
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [29 CFR §1614.102(c)(2)] <i>If yes, provide the schedule for conducting audits in the comments section.</i>	Yes	Agency ODEO reviews Center MD-715 plans and accomplishments on an annual basis.
C.1.c	Do component and field offices make reasonable efforts to comply with the recommendations of the field audit? [MD-715, II(C)]	Yes	
C.2 – The agency has established procedures to prevent all forms of EEO discrimination.		Measure Met?	Comments
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (6/18/99)]	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? [EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [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? [Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors, EEOC No. 915.002, § V.C.1 (6/18/99)]	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? [Enforcement Guidance, V.C.]	Yes	
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within ten days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [<i>Complainant v. Dep't of Veterans Affairs</i> , EEOC Appeal No. 0120123232 (May 21, 2015); <i>Complainant v.</i>	No	NASA uses an indicator of 60 days for case completion. In FY 2022, NASA completed 62.1 percent of cases in a timely fashion. See Part H-2.

	Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (5/29/15)] <i>If no, provide the percentage of timely-processed inquiries in the comments section.</i>		
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [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? [29 CFR 1614.203(d)(3)]	Yes	
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? [29 CFR 1614.203(d)(3)(D)]	Yes	
C.2.b.2	Has the agency established a firewall between the RA Program Manager and the EEO Director? [MD-110, Ch. 1(IV)(A)]	Yes	
C.2.b.3	Does the agency ensure that job applicants can request and receive RAs during the application and placement processes? [29 CFR 1614.203(d)(1)(ii)(B)]	Yes	
C.2.b.4	Do the RA procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [29 CFR 1614.203(d)(3)(i)(M)]	Yes	
C.2.b.5	Does the agency process all RA requests within the time frame set forth in its RA procedures? [MD-715, II(C)] <i>If no, provide percentage of timely-processed requests in the comments column.</i>	Yes	
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? [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 Web site? [29 CFR § 1614.203(d)(5)(v)] <i>If yes, provide the internet address in the comments column.</i>	Yes	https://nodis3.gsfc.nasa.gov/displayDir.cfm?t=NPR&c=3713&s=1B
C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.		Measure Met?	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	<i>Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following:</i>		
C.3.b.1	– Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [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? [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? [MD-715, II(C)]	Yes	
C.3.b.4	– Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to	Yes	

	supervise in a workplace with diverse employees? [MD-715 Instructions, Sec. I]		
C.3.b.5	– Provide religious accommodations when it does not cause an undue hardship? [29 CFR §1614.102(a)(7)]	Yes	
C.3.b.6	– Provide disability accommodations when it does not cause an undue hardship? [29 CFR §1614.102(a)(8)]	Yes	
C.3.b.7	– Support the EEO program in identifying and removing barriers to equal opportunity? [MD-715, II(C)]	Yes	
C.3.b.8	– Support the anti-harassment program in investigating and correcting harassing conduct? [Enforcement Guidance, V.C.2]	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? [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? [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? [29 CFR §1614.102(c)(2)]	Yes	
C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.		Measure Met?	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? [29 CFR §1614.102(a)(2)]	Yes	
C.4.b	Has 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? [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? [29 CFR §1614.601(a)]	Yes	
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? [MD-715, II(C)]	Yes	
C.4.e	<i>Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:</i>		
C.4.e.1	– Implement the Affirmative Action Plan for Individuals with Disabilities? [29 CFR §1614.203(d); MD-715, II(C)]	Yes	
C.4.e.2	– Develop and/or conduct outreach and recruiting initiatives? [MD-715, II(C)]	Yes	
C.4.e.3	– Develop and/or provide training for managers and employees? [MD-715, II(C)]	Yes	
C.4.e.4	– Identify and remove barriers to equal opportunity in the workplace? [MD-715, II(C)]	Yes	

C.4.e.5	– Assist in preparing the MD-715 report? [MD-715, II(C)]	Yes	
C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.		Measure Met?	Comments
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [29 CFR § 1614.102(a)(6); see also <i>Douglas v. Veterans Administration</i> , 5 MSPR 280 (1981)]	Yes	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [29 CFR §1614.102(a)(6)] <i>If yes, state the number of disciplined/sanctioned individuals during this reporting period in the comments.</i>	Yes	One employee was issued a letter of reprimand.
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? [MD-715, II(C)]	Yes	
C.6 – The EEO office advises managers/ supervisors on EEO matters.		Measure Met?	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? [MD-715 Instructions, Sec. I] <i>If yes, identify the frequency of updates in comments.</i>	Yes	At least annually.
C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions/concerns? [MD-715 Instructions, Sec. I]	Yes	
Essential Element D: PROACTIVE PREVENTION			
This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.			
D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.		Measure Met?	Comments
D.1.a	Does the agency have a process for identifying triggers in the workplace? [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; climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [MD-715 Instruct. 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? [29 CFR 1614.203(d)(1)(iii)(C)]	Yes	
D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)		Measure Met?	Comments
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [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? [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? [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, RA program; anti-harassment program; and/or external special interest groups? [MD-715 Instructions, Sec. I] <i>If yes, identify data sources in the comments section.</i>	Yes	Complaints, climate surveys (e.g., FEVS), anti-harassment program data, affinity groups, Special Emphasis Program (SEPs), employee pulse surveys, and other sources (when available).
D.3 – The agency establishes appropriate action plans to remove identified barriers.		Measure Met?	Comments
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [29 CFR §1614.102(a)(3)]	Yes	
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [MD-715, II(D)]	N/A	See Part I.
D.3.c	Does the agency periodically review the effectiveness of the plans? [MD-715, II(D)]	Yes	
D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.		Measure Met?	Comments
D.4.a	Does the agency post its affirmative action plan on its public Web site? [29 CFR 1614.203(d)(4)] <i>If yes, provide the internet address in the comments section.</i>	Yes	https://www.nasa.gov/offices/odeo/workforce-data
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [29 CFR 1614.203(d)(1)(i)]	Yes	
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [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? [29 CFR 1614.203(d)(7)(ii)]	Yes	
Essential Element E: EFFICIENCY			
This element requires the agency head to ensure there are effective systems for evaluating the impact and effectiveness of the agency’s EEO programs and an efficient and fair dispute resolution process.			
E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.		Measure Met?	Comments
E.1.a	Does the agency timely provide EEO counseling? [29 CFR §1614.105]	No	NASA timely completed 95 percent of counselings in FY 2022. See Part H-3.
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session? [29 CFR §1614.105(b)(1)]	Yes	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint? [MD-110, Ch. 5(I)]	Yes	
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after	Yes	The average processing time was 68 days.

	receipt of the written EEO Counselor report? [MD-110, Ch. 5(I)] <i>If yes, provide the average processing time in the comments section.</i>		
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? [29 CFR §1614.102(b)(6)]	Yes	
E.1.f	Does the agency timely complete investigations? [29 CFR §1614.108]	Yes	See Part H-4.
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? [29 CFR §1614.108(g)]	YES	NASA issues 180-day letters on cases even when they will not be untimely. See Part H-5.
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision? [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 (AJ) decision? [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? [MD-110, Ch. 5(V)(A)] <i>If yes, describe how in the comments.</i>	Yes	Timelines in the statement of work, templates to ensure consistency, and contractors must provide weekly status updates and inform the Contracting Officer's Representative (COR) immediately of any issues causing delays. The COR has regular meetings with contractors to address deficiencies or improvements.
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? [MD-110, Ch. 5(V)(A)]	Yes	
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal? [29 CFR § 1614.403(g)]	Yes	
E.2 – The agency has a neutral EEO process.		Measure Met?	Comments
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [MD-110, Ch. 1(IV)(D)] <i>If yes, please explain in the comments column.</i>	Yes	The attorney who provides legal advice to ODEO does not serve as the Agency representative.
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [MD-110, Ch. 1(IV)(D)] <i>If yes, identify the source/location of the attorney who conducts the legal sufficiency review in the comments.</i>	Yes	The attorney who provides legal advice to ODEO does not serve as the Agency representative.
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? [MD-110, Ch. 1(IV)(D)]	Yes	
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [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? [EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes	
E.3 - The agency has established and encouraged the widespread use of a fair ADR program.		Measure Met?	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? [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? [MD-715, II(A)(1)]	Yes	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [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? [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? [MD-110, Ch. 3(I)]	Yes	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [MD-110, Ch. 3(II)(D)]	Yes	
E.4 - The agency has effective and accurate data collection systems in place to evaluate its EEO program.		Measure Met?	Comments
E.4.a	<i>Does the agency have systems in place to accurately collect, monitor, and analyze the following:</i>		
E.4.a.1	- Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/ complainants, and the involved management official? [MD-715, II(E)]	Yes	
E.4.a.2	- The race, national origin, sex, and disability status of agency employees? [29 CFR §1614.601(a)]	Yes	
E.4.a.3	- Recruitment activities? [MD-715, II(E)]	Yes	
E.4.a.4	- External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [MD-715, II(E)]	Yes	
E.4.a.5	- The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	
E.4.a.6	- The processing of complaints for the anti-harassment program? [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	
E.5 - The agency identifies and disseminates significant trends and best practices in its EEO program.		Measure Met?	Comments
E.5.a	Does the agency monitor trends in its EEO program to determine whether agency is meeting its obligations under the statutes EEOC enforces? [MD-715, II(E)] <i>If yes, provide example in the comments section.</i>	Yes	NASA regularly reviews data on the workforce, EEO complaints, and harassment allegations, and reports trends to leadership.
E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the	Yes	NASA reviews other agencies' MD-715 reports, benchmarks

	effectiveness of its EEO program? [MD-715, II(E)] <i>If yes, provide example in the comments section.</i>		with other agencies, reviews best practices, and adopts best practices when appropriate.
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [MD-715, II(E)]	Yes	
Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.			
F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.		Measure Met?	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? [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? [MD-715, II(F)]	Yes	
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [MD-715, II(F)]	Yes	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [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? [MD-110, Ch. 9(IX)(H)]	Yes	
F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.		Measure Met?	Comments
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [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? [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? [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? [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	
F.3 - The agency reports to EEOC its program efforts and accomplishments.		Measure Met?	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? [29 CFR §1614.703(d)]	Yes	
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PART H: ESSENTIAL ELEMENT DEFICIENCIES AND PLANNED ACTIVITIES

NASA completed Parts H-4 and H-5 in FY 2022; no new deficiencies were identified.

MD-715 PART H-1	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
DESCRIPTION AND TYPE OF PROGRAM DEFICIENCY:	The Agency head is not the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office [29 CFR §1614.102(b)(4)], nor does the EEO Director report to the same Agency head designee as the mission-related programmatic offices. (Part G, Integration of EEO into the Agency’s Strategic Mission, Measure B.1.a, and Measure B.1.a1)			
OBJECTIVE:	Revise Agency structure so that the AA, ODEO, reports directly to the NASA Administrator.			
RESPONSIBLE OFFICIAL:	NASA Administrator; AA, ODEO			
DO THE RESPONSIBLE OFFICIAL’S PERFORMANCE STANDARDS ADDRESS THIS PLAN? (Yes or No) No				
DATES:	Date Initiated	Target Completion Date	Modified Date	Date Completed
	10/1/2020	12/31/2021	9/30/2023	
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:				
Target Date	Planned Activities	Sufficient Funding & Staffing?	Modified Date	Completion Date
12/31/2021	1. NASA Administrator makes a decision on how to address this deficiency.	Yes	9/30/2023	
12/31/2021	2. NASA completes administrative actions, including updating its organizational chart, to implement the new reporting structure.	Yes	9/30/2023	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE				
<u>FY 2022 Progress and Accomplishments:</u> NASA continues to review its organizational structure.				
<u>Modifications to Objective:</u> Modified completion date to 9/30/2023.				

U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT				
MD-715 PART H-2				
DESCRIPTION AND TYPE OF PROGRAM DEFICIENCY:	NASA does not conduct a prompt inquiry (beginning within ten days of notification) of all harassment allegations, including those initially raised in the EEO complaint process. (Part G, Management and Program Accountability, Measure C.2.5.a)			
OBJECTIVE:	Establish timeframes for completing inquiries of harassment allegations under the Anti-Harassment Program.			
RESPONSIBLE OFFICIAL:	AA, ODEO, and Director, Equal Opportunity Programs Division, ODEO			
DO THE RESPONSIBLE OFFICIAL'S PERFORMANCE STANDARDS ADDRESS THIS PLAN? (Yes or No) Yes				
DATES:	Date Initiated	Target Completion Date	Modified Date	Date Completed
	2/1/2020	1/31/2021	9/30/2023	
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:				
Target Date	Planned Activities	Sufficient Funding & Staffing?	Modified Date	Completion Date
3/30/2020	1. Draft revised procedures.	Yes		3/30/2020
6/30/2020	2. Obtain feedback from other NASA offices.	Yes		6/30/2020
11/30/2020	3. Make necessary revisions.	Yes		11/30/2020
1/31/2021	4. Finalize and publish new procedures.	Yes		1/12/2021
3/30/2022	5. Finalize development of and launch tracking system for anti-harassment cases.	Yes		10/1/2021
9/30/2022	6. Provide training and technical assistance to Center Anti-Harassment Coordinators on conducting immediate interviews.	Yes	9/30/2023	
12/31/2022	7. Hire Anti-Harassment and ADR Program Manager.	Yes		
12/31/2022	8. Initiate Anti-Harassment Campaign 2.0 with NASA Administrator's message to the workforce.	Yes		
9/30/2023	9. Deliver a training event for the Anti-Harassment Community of Practice focused on ensuring a victim-centered, trauma-informed approach.	Yes		
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE				
<p><u>FY 2022 Progress and Accomplishments:</u> NASA embedded its Workplace Safety and Harassment Prevention and Response Plan into its DEIA Strategic Plan. Implementation of a NASA-wide Anti-Harassment Campaign was developed as a key performance goal in the DEIA Strategic Plan. NASA committed funding and staffing for a position dedicated to managing the Anti-Harassment and ADR Programs.</p> <p><u>Modifications to Objective:</u> Added planned activities #7-9; modified completion date to 9/30/2023.</p>				

MD-715 PART H-3		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
DESCRIPTION AND TYPE OF PROGRAM DEFICIENCY:	NASA does not complete EEO counseling within the timeframes established by 29 CFR. Part 1614, Section 105 and EEOC regulations. (Part G, Efficiency, Measure E.1.a)				
OBJECTIVE:	Ensure all EEO counselings are timely completed in accordance with all regulatory requirements.				
RESPONSIBLE OFFICIAL:	AA, ODEO; Director, Complaints Management Division, ODEO; Center ODEO Directors				
DO THE RESPONSIBLE OFFICIAL'S PERFORMANCE STANDARDS ADDRESS THIS PLAN? (Yes or No) Yes					
DATES:	Date Initiated	Target Completion Date	Modified Date	Date Completed	
	9/28/2018	9/30/2019	9/30/2023		
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:					
Target Date	Planned Activities		Sufficient Funding & Staffing?	Modified Date	Completion Date
9/28/2018	1. Streamline processes by eliminating duplicative layers of review and shortening the review and approval periods.		Yes		9/28/2018
9/30/2019	2. Provide training in informal complaints processing, counseling techniques, writing counselor's reports, and framing claims.		Yes		9/30/2019
9/30/2019	3. Conduct quarterly discussions with responsible staff to address processing challenges and share/ implement changes, when and where needed.		Yes		9/30/2019
9/30/2019	4. Utilize Agency cadre of counselors.		Yes		9/30/2019
9/30/2019	5. Hold responsible staff, including contractors, responsible for timely and quality investigation of complaints.		Yes		9/30/2019
9/30/2019	6. Review monthly complaint processing data by Center to track compliance to regulatory requirements, send reminders, and address timeliness and quality of processing issues as expeditiously as possible.		Yes	9/30/2023	
9/30/2021	7. Provide forums to discuss Agency-wide issues at the informal complaints stage to increase timeliness.		Yes		9/30/2021
9/30/2021	8. Provide training, including EEO Refresher Training focusing on specific NASA-related complaint issues.		Yes		4/7/2021
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE					
<p><u>FY 2022 Progress and Accomplishments:</u> In FY 2022, NASA timely completed 95 percent of its counselings (compared to 89 percent in FY 2021).</p> <p><u>Modifications to Objective:</u> Modified completion date to 9/30/2023. NASA will continue to review monthly complaint processing data to track compliance to regulatory requirements and will develop additional interventions, as necessary, to improve timeliness.</p>					

U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT				
MD-715 PART H-4				
DESCRIPTION AND TYPE OF PROGRAM DEFICIENCY:	NASA does not complete EEO investigations within the timeframes established by 29 CFR. Part 1614, Section 108 and EEOC regulations. (Part G, Efficiency, Measure E.1.f)			
OBJECTIVE:	Ensure all EEO investigations are timely completed in accordance with all regulatory requirements.			
RESPONSIBLE OFFICIAL:	AA, ODEO; Director, Complaints Management Division, ODEO			
DO THE RESPONSIBLE OFFICIAL'S PERFORMANCE STANDARDS ADDRESS THIS PLAN? (Yes or No) Yes				
DATES:	Date Initiated	Target Completion Date	Modified Date	Date Completed
	9/28/2018	9/30/2019	9/30/2022	9/30/2022
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:				
Target Date	Planned Activities	Sufficient Funding & Staffing?	Modified Date	Completion Date
9/28/2018	1. Streamline processes by eliminating duplicative layers of review and shortening the review and approval periods.	Yes		9/28/2018
9/30/2019	2. Provide training on formal complaints processing.	Yes		9/30/2019
9/30/2019	3. Conduct quarterly discussions with responsible staff to address processing challenges and share/implement changes, when and where needed.	Yes		9/30/2019
9/30/2019	4. Engage contractors who are experienced, skilled, and knowledgeable in Federal EEO complaints processing.	Yes		9/30/2019
9/30/2019	5. Hold responsible staff, including contractors, responsible for timely and quality investigation of complaints.	Yes		9/30/2019
9/30/2019	6. Review monthly complaint processing data to track compliance to regulatory requirements and address timeliness and quality of processing issues as expeditiously as possible when there is a need.	Yes		9/30/2019
9/30/2020	7. Remove non-mandated reviews by Complainant and Agency Legal Representative to assist with timeliness.	Yes		9/30/2020
9/30/2020	8. Ensure record is closed, parties are notified, and appropriate election rights are provided.	Yes		9/30/2020
9/30/2020	9. Increase the number of contractors.	Yes		9/30/2020
9/30/2021	10. Increase the number of staff reviewing Investigation Plans.	Yes		9/30/2021
9/30/2021	11. Track and monitor investigations to ensure full compliance with regulatory timeframes.	Yes	9/30/2022	9/30/2022
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE				
<p><u>FY 2022 Progress and Accomplishments:</u> The timeliness of investigations increased from 95 percent in FY 2021 to 100 percent in FY 2022. NASA will continue to closely monitor its investigations to ensure compliance with regulations.</p>				

Modifications to Objective: *Objective completed.*

MD-715 PART H-5		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
DESCRIPTION AND TYPE OF PROGRAM DEFICIENCY:	NASA does not 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). (Part G, Efficiency, Measure E.1.g)				
OBJECTIVE:	Ensure all "180-day" letters are issued when appropriate.				
RESPONSIBLE OFFICIAL:	AA, ODEO; Director, Complaints Management Division, ODEO				
DO THE RESPONSIBLE OFFICIAL'S PERFORMANCE STANDARDS ADDRESS THIS PLAN? (Yes or No) Yes					
DATES:	Date Initiated	Target Completion Date	Modified Date	Date Completed	
	10/1/2020	9/30/2021	9/30/2022	9/30/2022	
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:					
Target Date	Planned Activities		Sufficient Funding & Staffing?	Modified Date	Completion Date
9/30/2021	Issue 180-day letters, when appropriate, within 175 calendar days of when the formal complaint was filed.		Yes	9/30/2022	9/30/2022
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE					
<u>FY 2022 Progress and Accomplishments:</u> NASA developed standard operating procedures for its complaints processing program.					
<u>Modifications to Objective:</u> <i>Objective completed.</i>					

PART I: BARRIER ANALYSIS AND PLANNED ACTIVITIES

MD-715 PART I-1		<i>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</i>	
TRIGGER ANALYSIS			
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?	A comparison of FY 2020-21 NASA workforce data to the RCLF revealed that AAPI and Women have lower than expected participation rates in Physical Scientist positions (U.S. Office of Personal Management (OPM) code 1301)) at NASA. Specifically, AAPI account for 13.2 percent of Physical Scientists at NASA compared to 16.4 percent in the RCLF. Women account for 31.2 percent of NASA Physical Scientists compared to 43.4 percent in the RCLF. Both AAPI women and White women account for a lower percentage of Physical Scientists at NASA than they do in the RCLF. AAPI women are 3.8 percent of NASA Physical Scientists yet are 7.5 percent of physical scientists in the RCLF. Similarly, White women are 23.3 percent of NASA Physical Scientists, compared to 29.8 percent in the RCLF.		
SOURCE OF TRIGGER:	NASA has prolonged (FY 2018 to present), lower than expected, workforce participation compared to the RCLF benchmark for certain groups.		
MD-715 WORKFORCE DATA TABLE:	Table A6		
EEO GROUP(S) AFFECTED BY TRIGGER:	Check all that apply:		
	All Men	Asian Males	X
	All Women	Asian Females	X
	Hispanic or Latino Males	Native Hawaiian or Other Pacific Islander Males	X
	Hispanic or Latino Females	Native Hawaiian or Other Pacific Islander Females	X
	White Males	American Indian or Alaska Native Males	
	White Females	X American Indian or Alaska Native Females	
	Black or African American Males	Two or More Races Males	
	Black or African American Females	Two or More Races Females	
BARRIER ANALYSIS PROCESS			
SOURCES OF DATA:	Sources	Source Reviewed (Y/N)?	Identify Information Collected
	Workforce Data Tables	Yes	Table A6
	Complaint Data (Trends)	Yes	
	Grievance Data (Trends)	Yes	
	Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	N/A	
	Climate Survey (e.g., FEVS)	Yes	FEVS Indexes

	Exit Interview Data	No				
	Focus Groups	No				
	Interviews	Yes				
	Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No				
	Other (Please Describe)	N/A				
STATUS OF BARRIER ANALYSIS PROCESS:	Barrier analysis process completed? (Y/N) No, four of seven phases completed.					
	Barrier(s) identified? (Y/N) Not completed.					
STATEMENT OF IDENTIFIED BARRIER(S): (Description of Policy, Procedure, or Practice)	Barriers not yet identified; pending completion of barrier analysis on or about 9/30/2022.					
EEO PLAN TO ELIMINATE IDENTIFIED BARRIER(S)						
OBJECTIVE(S):	Objective	Date Initiated	Target Date	Sufficient Funding/Staffing	Modified Date	Date Completed
	NASA will strengthen its data analytics capabilities and conduct in-depth barrier analyses to identify specific opportunities for positive change.	1/2/2018	9/30/2020	Yes		9/30/2020
	Track and monitor the participation rate of Women and AAPI in the Physical Scientists occupational category.	1/28/2019		Yes		9/30/2020
	Complete barrier analysis.	10/1/2020	9/30/2020	Yes	11/15/2022	
	Implement a DEIA analytics capability within NASA's Enterprise Data Platform to enable evidence-based awareness, planning, decisions, and assessments of the current and future state of DEIA at NASA.	11/30/2021	9/30/2026	Yes		
RESPONSIBLE OFFICIAL(S):	Title	Name		Performance Standards Address Plan? (Y/N)		
	AA, ODEO	Stephen T. Shih		Yes		
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:						
Target Date	Planned Activities				Modified Date	Completion Date
9/28/2018	1. ODEO will partner with other NASA organizations, including Office of the Chief Human Capital Officer (OCHCO) and the					9/28/2018

	Science Mission Directorate (SMD), to strengthen its data analytics capabilities to enable ODEO to conduct in-depth barrier analyses.		
9/30/2018	2. NASA will update and improve its standard data reports to ensure that the necessary data are available for conducting barrier analyses related to EEO.	5/15/2019	5/15/2019
9/30/2020	3. ODEO will leverage current NASA systems and develop additional data tools such as: FEVS, NASA Human Capital Management Workforce Analysis Business Intelligence Tools, climate surveys, pulse surveys, and potential new database systems, to enhance our ability to analyze programs and practices at more granular levels.		9/30/2020
9/30/2020	4. ODEO will review relevant data sources such as EEO complaints, grievances, surveys, exit interviews, and reports for any indicators of barriers regarding employment of women and AAPI as physical scientists.	9/30/2021	9/30/2021
9/30/2020	5. NASA will review applicant flow data by race and gender for Physical Scientist positions in FY 2020.	4/1/2021	4/1/2021
10/1/2020	6. NASA will develop a formal barrier analysis plan for barrier analysis of women and AAPI physical scientists.		10/1/2020
11/16/2020	7. NASA will examine participation triggers to include participation overall, by grade, and by position. (Phases 1-2 of the barrier analysis plan)		11/16/2020
4/1/2021	8. NASA will examine workforce data, training history, and other existing data sources for potential explanations for triggers identified in Phases 1-2 of the barrier analysis. (Phase 3)		4/1/2021
9/30/2021	9. NASA will collect qualitative information from NASA Centers and organizations to better understand trends identified in the initial phases of the barrier analysis. (Phase 4)	12/31/2021	12/10/2021
6/30/2022	10. NASA will collect qualitative and quantitative data from NASA Physical Science employees to gain deeper insight into potential barriers and potential solutions to those barriers. (Phases 5 and 6)	11/01/2022	
9/30/2022	11. NASA will review all data collected in Phases 1-6 of the barrier analysis to determine whether barriers to equal employment opportunity exist for Women and AAPI in the Physical Sciences at NASA. (Phase 7)	11/15/2022	
6/30/2022	12. Identify key data sources and new data collection, both internal and external to NASA, to support DEIA analytics and reporting requirements.		6/30/2022

9/30/2022	13. Create a DEIA data architecture that links data requirements to analytic questions and strategic and operational decisions. Identify gaps in data elements and data standards that NASA can mitigate internally as well as communicate data gaps to OMB, OPM, and other external data stewards who can help address.		9/30/2022
9/30/2022	14. Establish a technical infrastructure and implement industry best-practice analytic tools to be able to exploit the benefits of cloud-based, big-data analytics.		9/30/2022
9/30/2026	15. Implement meaningful analytic products, dashboards, and models aligned to NASA's internal and external stakeholder and customer needs to improve decision-making, encourage data sharing, and improve accountability.		
6/30/2022	16. Identify and acquire additional resources through the Federal Government and NASA's budget processes to successfully implement an effective analytics capability aligned with the new requirements extended by the Administration's priorities as well as NASA's internal requirements.		6/30/2022
9/30/2026	17. Assess current data governance and related policies to ensure effective data management, stewardship, and security.		

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

FY 2022 Progress: NASA identified key data sources (e.g., NASA Personnel Data Warehouse, American Community Survey, OPM's FedScope, and the Federal Employee Viewpoint Survey) and developed a roadmap for the Future State of DEIA Data Analytics. In addition, NASA issued a Statement of Work and onboarded contract Data Scientists and Data Engineers to begin the ingestion of data into the NASA Enterprise Data Platform. NASA also identified user needs for analytic dashboards and developed prototype DEIA dashboard in Tableau, which will be enhanced by the data contractors.

In addition, in early FY 2022, NASA completed Phase 4 of the barrier analysis on Physical Science positions; this involved the collection of qualitative data from managers and human resource personnel. Findings of Phases 1-3 generated additional questions about root causes. These potential root causes were further explored in April 2022 with a psychometric survey. This survey yielded useful insights into root causes. The final phase of data collection and analysis, focus groups, is under way with anticipated completion in early November 2022. This final phase will identify remaining root causes and potential corrective actions.

Modifications to Objective: None.

MD-715 PART I-2	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT																																			
TRIGGER ANALYSIS																																				
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?	A review of NASA workforce data revealed that the percentage of minorities and women decreases as grade levels increase. For example, in FY 2022, Hispanics and Latinos accounted for 10.9 percent of NASA employees at grades GS-13 and below, 7.5 percent at grades GS-14 and GS-15, and 5.3 percent of the SES. Women account for 40.8 percent of those in grades GS-13 and below, 31.7 percent in grades GS-14 and GS-15, and 36.5 percent of those in the SES. Although the percentages of minorities and women at each age group has increased slightly since FY 2017, this trend has remained. (See Appendix A.)																																			
SOURCE OF TRIGGER:	Smaller percentage of the workforce occupied by women and minorities at higher grades.																																			
MD-715 WORKFORCE DATA TABLE:	Tables A4 and A7																																			
EEO GROUP(S) AFFECTED BY TRIGGER:	Check all that apply: <table border="1" data-bbox="441 831 1536 1171"> <tbody> <tr> <td>All Men</td> <td></td> <td>Asian Males</td> <td>X</td> </tr> <tr> <td>All Women</td> <td>X</td> <td>Asian Females</td> <td>X</td> </tr> <tr> <td>Hispanic or Latino Males</td> <td>X</td> <td>Native Hawaiian or Other Pacific Islander (NHOPI) Males</td> <td>X</td> </tr> <tr> <td>Hispanic or Latino Females</td> <td>X</td> <td>NHOPI Females</td> <td>X</td> </tr> <tr> <td>White Males</td> <td></td> <td>American Indian or Alaska Native Males</td> <td>X</td> </tr> <tr> <td>White Females</td> <td>X</td> <td>American Indian or Alaska Native Females</td> <td>X</td> </tr> <tr> <td>Black or African American Males</td> <td>X</td> <td>Two or More Races Males</td> <td>X</td> </tr> <tr> <td>Black or African American Females</td> <td>X</td> <td>Two or More Races Females</td> <td>X</td> </tr> </tbody> </table>			All Men		Asian Males	X	All Women	X	Asian Females	X	Hispanic or Latino Males	X	Native Hawaiian or Other Pacific Islander (NHOPI) Males	X	Hispanic or Latino Females	X	NHOPI Females	X	White Males		American Indian or Alaska Native Males	X	White Females	X	American Indian or Alaska Native Females	X	Black or African American Males	X	Two or More Races Males	X	Black or African American Females	X	Two or More Races Females	X	
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Other (Please Describe)	N/A																																			

STATUS OF BARRIER ANALYSIS PROCESS:	Barrier analysis process completed? (Y/N) No; we will begin process in FY 2023					
	Barrier(s) identified? (Y/N) Not completed.					
STATEMENT OF IDENTIFIED BARRIER(S): (Description of Policy, Procedure, or Practice)	Barriers not yet identified; pending completion of barrier analysis on or about 9/30/2025.					
EEO PLAN TO ELIMINATE IDENTIFIED BARRIER(S)						
OBJECTIVE(S):	Objective	Date Initiated	Target Date	Sufficient Funding/ Staffing	Modified Date	Date Completed
	Track and monitor the participation rate of Women and minorities at higher grades	6/30/2022	9/30/2024	Yes		
	Complete barrier analysis.	10/30/2022	9/30/2025	Yes		
	Establish process for routine barrier analyses	11/30/2022	9/30/2023	Yes		
RESPONSIBLE OFFICIAL(S):	Title	Name			Performance Standards Address Plan? (Y/N)	
	AA, ODEO	Stephen T. Shih			Yes	
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:						
Target Date	Planned Activities				Modified Date	Date Completed
12/31/2022	1. Review relevant data sources such as EEO complaints, grievances, surveys, exit interviews, and reports for any indicators of barriers to advancement for women and minorities.					
02/28/2023	2. Examine participation triggers by location (NASA Center, occupation, and other factors).					
03/31/2023	3. Develop a formal barrier analysis plan for barrier analysis of the participation rates of Women and minorities at higher grades.					
06/30/2023	4. Conduct initial analyses as identified in the barrier analysis plan.					
9/30/2023	5. Develop data dashboards to aid in the analysis of data for this and future barrier analyses.					
9/30/2023	6. Institute a routine barrier analysis program designed to address potential barriers more quickly and complete multiple barrier analyses each year.					
9/30/2025	7. Complete barrier analysis of participation rates at higher grades.					
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE						
<p><u>FY 2022 Progress:</u> NASA identified this trigger and began reporting progress regularly to the NASA Mission Support Performance Management Council and in progress updates to the NASA Strategic Plan and NASA DEIA Strategic Plan.</p> <p><u>Modifications to Objective:</u> This is a new objective for FY 2023.</p>						

PART J: SPECIAL PROGRAM PLAN FOR THE RECRUITMENT, HIRING, ADVANCEMENT, AND RETENTION OF PERSONS WITH DISABILITIES

MD-715 PART J	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
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To capture agencies' affirmative action plans for IWD and IWTD, EEOC regulations (29 CFR. § 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.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the Federal Government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving IWD 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 (IWD) | Yes | No <input checked="" type="checkbox"/> |
| b. Cluster GS-11 to SES (IWD) | Yes | No <input checked="" type="checkbox"/> |

There are no triggers. In FY 2022, IWD accounted for 25 percent of employees GS-1 to GS-10 and 13 percent of employees GS-11 to SES.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving IWTD 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 (IWTD) | Yes | No <input checked="" type="checkbox"/> |
| b. Cluster GS-11 to SES (IWTD) | Yes | No <input checked="" type="checkbox"/> |

There are no triggers. In FY 2022, IWTD accounted for seven percent of employees GS-1 to GS-10 and 3 percent of employees GS-11 to SES.

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

NASA continues to communicate disability numerical goals in various forums, including briefings for managers and supervisors, individual meetings with hiring and recruitment managers, and all-hands meetings for supervisors. Data on employees with disabilities is regularly communicated to Center Disability Program Managers (DPMs) and their supervisors. Further, in September 2022, NASA sent a memo to the NASA workforce explaining the purpose of and encouraging voluntary self-identification of employee disability status. As a result, the Agency had an increase of 64 self-identified employees with disabilities (60 non-targeted and four targeted), in the two weeks after the memo was sent.

Section II: Model Disability Program

Pursuant to 29 CFR. §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 and 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

NASA has an Agency DPM and a Center DPM at each NASA Center.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from IWD and IWTD	10			All ten NASA Centers have designated Human Capital personnel responsible for processing applications, including those from IWD.
Answering questions from the public about hiring authorities that take disability into account	1		10	NASA has a designated Selective Placement Coordinator Team in OCHCO that is responsible for responding to questions related to the Agency’s hiring practices related to disability. NASA Staffing Services receives and responds to questions from the public about hiring authorities, which includes disability. ODEO and the Office of the Chief Information Officer (OCIO) developed a public-facing webpage containing resources for NASA applicants regarding numerous disability resources, including technology accessibility.
Processing RA requests from applicants and employees	10			All ten NASA Centers have a designated DPM who is responsible for processing reasonable accommodation (RA) requests.
Section 508 Compliance	11			The NASA HQ Section 508 Compliance Officer manages the Agency’s Section 508 policy and practices. Each NASA Center has a designated Section 508 Compliance Officer who is responsible for ensuring compliance at the operational level. NASA DPMs work closely with the Section 508 compliance end-user interest group on issues that arise, and the Agency DPM regularly communicates with OCIO on issues requiring technological solutions.
Architectural Barriers Act (ABA) Compliance	11			NASA has a designated Program Manager in the Facilities Engineering Division who manages the Agency’s strategic plan to ensure compliance in this arena. Additionally, all

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
				ten NASA Centers have designated facilities engineers who are responsible for ensuring compliance at the operational level.
Special Emphasis Program (SEP) for IWD/IWTD	10			NASA has DPMs at each of the ten Centers responsible for managing SEP activities. NASA also has seven disability-focused ERGs.

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

In FY 2022, the Agency-level Disability Employment Program (DEP) sponsored two 3.5-hour trainings for all NASA employees, including supervisors and managers and Center DPMs: Reasonable Accommodation for Supervisors and Managers and Reasonable Accommodation for Employees. The DEP also sponsored trainings on making a document Section 508 compliant (PDF and Microsoft Suite documents), and Deaf Etiquette and an American Sign Language lesson. Center-level DPMs received technical assistance and training from the Agency’s DPM during quarterly meetings and on an ad hoc basis on a variety of topics, particularly concerning the processing of religious and medical, required by Presidential Executive Order (E.O.) 14043, issued on September 9, 2021, as well as in cases following the abeyance of the Covid vaccination mandate regarding testing, masking, and remote work.

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

Adequate resources are provided for Agency-wide implementation of the Disability Program.

Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 CFR. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of IWD. The questions below are designed to identify outcomes of the Agency’s recruitment program plan for IWD and IWTD.

A. Plan to Identify Job Applicants with Disabilities

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

NASA's external efforts to identify job applicants with disabilities and targeted disabilities include: participating in targeted job fairs and outreach events, and engaging in social networking platforms that support employment of IWDs; building and strengthening partnerships with local and Federal disability organizations, state and local rehabilitation and employment agencies, local colleges and universities, and programs (such as Centers for Independent Living, Department of Labor's Workforce Recruitment Program, and Employment Network Service providers) to recruit and hire individuals with disabilities IWD and IWTD; and leveraging disability ERGs and SEPs to encourage participation in job opportunities within the IWD population, as well as to conduct outreach and mentoring opportunities for students with disabilities to increase the STEM pipeline to ensure future employees with disabilities/targeted disabilities.

NASA uses its internship programs as the primary method for hiring early career employees. In FY 2022, ODEO and the Office of STEM Engagement (OSTEM) coordinated to support interns with disabilities. The DEP developed a NASA Disability Resources packet of information for OSTEM and Pathways interns containing information for NASA interns with disabilities, including disability-related materials and links, guidance for applicants with disabilities in the Federal hiring process, disability technology accessibility resources, and information on requesting an RA.

ODEO communicates as necessary with the OCHCO to ensure continuity of RAs for job applicants with disabilities and targeted disabilities.

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

The NASA selective placement coordinator team works with managers and promotes recruitment utilizing special hiring authorities (i.e., Schedule A and disabled veterans' programs). A critical piece of NASA's recruitment strategy focuses on increasing workforce diversity, specifically targeting our veteran communities, by reaching new talent communities and establishing NASA as an employer that celebrates diversity and inclusion as key to its success. In addition, OCHCO has established communities of practice and tiger teams, and coordinated with ERGs across the Agency (including disability ERGs) to streamline recruitment efforts and establish consistent employer value proposition messaging and outreach strategies with diversity groups.

Specific initiatives included:

- Making NASA more accessible in our recruitment and social media messaging, especially to applicants with disabilities.
- Targeting outreach using hiring campaigns on LinkedIn to reach passive quality talent.
- Developing campaigns and talent networks for diverse candidates to receive ongoing newsletters and communications about careers at NASA.
- Hosting "question and answer" (Q&A) sessions on LinkedIn to interact with candidates about a career at NASA.
- Using graphic posts or hiring manager videos to promote specific vacancies on LinkedIn or other agency social media channels. NASA provides guidance to employees, including

disability ERGs, on how to share this content with their own networks to reach a broader candidate pool.

- Leveraging relationships with organizations with diverse membership bases, as well as educational institutions.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

When applicants apply to NASA announcements open to individuals eligible under the Schedule A hiring authority, HR specialists provide information about the hiring authority and ask individuals if they are eligible. This enables HR specialists to identify and refer these individuals to hiring officials and provide information and guidance to hiring officials on using the authority. If selected under the Schedule A authority, the individual is asked to provide proof of eligibility before appointment.

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

NASA Centers provide regular training sessions for hiring officials, particularly for new managers and supervisors. ODEO participates quarterly in OCHCO's "HR101" training for new supervisors and managers, which includes training on the full spectrum of hiring flexibilities, DEIA, Reasonable Accommodations for Employees with Disabilities, Anti-harassment, and EEO Complaints Management. Hiring managers are regularly reminded of the Schedule A hiring authority via consultation with their ODEO representatives and at various leadership meetings and recruitment discussions. Centers also conduct training for hiring officials on disability hiring authorities.

B. Plan to Establish Contacts with Disability Employment Organizations

Describe the agency's efforts to establish and maintain contacts with organizations that assist IWD, including IWTD, in securing and maintaining employment.

In FY 2022, NASA DPMs worked with a variety of partner organizations to recruit IWD. Several NASA Centers are located near military installations and thus have many opportunities to engage the local veteran community. NASA participates in employment fairs and outreach activities for veterans and disabled veterans, and works with programs supporting employment of IWD and IWTD, including the Blinded Veterans Association National Conference, various state and local vocational rehabilitation offices, and the Veterans Administration. NASA partners with Federal, state, and local employment organizations, local colleges, and disability-related organizations to recruit and hire IWD and IWTD; these partners include groups such as American Job Centers, the Veterans' Vocational Rehabilitation and Employment Program, Centers for Independent Living, DOL, and Employment Network Service providers. NASA engages with a number of other professional organizations for IWD/IWTD via social media as well.

C. Progression Towards Goals (Recruitment and Hiring)

1. Using the goals of 12% for IWD and 2% for IWTD as the benchmarks, do triggers exist for IWD or IWTD among the new hires in the permanent workforce? If yes, describe the triggers below.

- | | | | |
|---|-----|---|----|
| a. New Hires for Permanent Workforce (IWD) | Yes | X | No |
| b. New Hires for Permanent Workforce (IWTD) | Yes | X | No |

In FY 2022, 10.0 percent of all new hires were IWDs and 1.6 percent of all new hires were IWTDs.

2. Using the qualified applicant pool as the benchmark, do triggers exist for IWD/IWTD among the new hires for any of the MCOs? If yes, describe the triggers below.

- | | | | | |
|-----------------------------|-----|----|-----|---|
| a. New Hires for MCO (IWD) | Yes | No | N/A | X |
| b. New Hires for MCO (IWTD) | Yes | No | N/A | X |

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to work to develop new reports and will evaluate the data when available.

3. Using the relevant applicant pool as the benchmark, do triggers exist for IWD/IWTD among the qualified internal applicants for any of the MCOs? If yes, describe the triggers below.

- | | | | | |
|--|-----|----|-----|---|
| a. Qualified Applicants for MCO (IWD) | Yes | No | N/A | X |
| b. Qualified Applicants for MCO (IWTD) | Yes | No | N/A | X |

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to work to develop new reports and will evaluate the data when available.

4. Using the qualified applicant pool as the benchmark, do triggers exist for IWD/IWTD among employees promoted to any of the MCOs? If yes, describe the triggers below.

- | | | | | |
|------------------------------|-----|----|-----|---|
| a. Promotions for MCO (IWD) | Yes | No | N/A | X |
| b. Promotions for MCO (IWTD) | Yes | No | N/A | X |

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to work to develop new reports and will evaluate the data when available.

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

Pursuant to 29 CFR §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 IWD and IWTD have sufficient opportunities for advancement.

NASA Centers regularly assess the demographics of employees applying for and receiving promotions as well as assessing the diversity of selection panels and hiring officials, to ensure that IWD and other traditionally underrepresented groups are included. Further, the Agency conducts listening sessions with individuals who are members of underserved communities to understand their experience navigating the promotions process, as well as provides Executive Champions for under-represented employee groups.

NASA is working on new systems and processes to collect the data necessary to evaluate promotion rates and practices, including training and development history, employee tenure, and education level.

B. Career Development Opportunities

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

NASA’s policy on employee and organizational development is to support the full utilization of the workforce in achieving the Agency’s strategic outcomes and managing its human capital. To do so, NASA makes training and developmental opportunities widely available to employees to enhance individual and organizational capabilities and competencies in accordance with Merit System Principles. NASA’s learning and development strategy adheres to the 70/20/10 model. Employee development takes place on applied hands-on projects (70 percent); mentoring, coaching, and feedback (20 percent); and formal training (ten percent).

NASA is beginning to pilot professional development for targeted communities. Further, the NASA Emerging Leaders Program has a specific module dedicated to DEIA. This nine-month program will integrate DEIA into the fabric of the course rather than in a specific module. The program will include a self-assessment that measures individual cultural diversity, which will set the stage for self-awareness and action for change.

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 (#)		IWD (%)		IWT D (%)	
	Applicants	Selectees	Applicants	Selectees	Applicants	Selectees
Internship Programs	52,316	1,901	4.2%	4.6%	--	--
Detail Programs	3,346	326	10.9%	5.8%	2.9%	2.1%
Fellowship Programs	Data not available or programs not conducted in FY 2022.					
Mentoring Programs						
Coaching Programs						
Training Programs						

Sources: Internship Programs - NASA Office of STEM Engagement (the number of interns with disabilities is the number of persons who requested a reasonable accommodation; OSTEM does not require interns to disclose the nature of their disabilities, thus data on IWT D are not collected). Detail Programs – OCHCO, Talent Marketplace data.

3. Do triggers exist for IWD among the applicants and/or selectees for any of the career development programs? (The 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 (IWD) Yes X No N/A

b. Selections (IWD) Yes X No N/A

There are no triggers for the internship program. For details, the IWD account for 13.7 percent of the relevant applicant pool but are only 10.9 percent of applicants. Further, IWD are only 5.8 percent of selectees.

4. Do triggers exist for IWTD among the applicants and/or selectees for any of the career development programs identified? (The 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 (IWTD) Yes No X
 b. Selections (IWTD) Yes No X

There are no triggers.

C. Awards

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving IWD/IWTD for any level of the time-off awards, bonuses, or other incentives? If yes, describe the trigger(s).

a. Awards, Bonuses, & Incentives (IWD) Yes X No
 b. Awards, Bonuses, & Incentives (IWTD) Yes X No

In FY 2022, the inclusion rates were 11.6 percent for IWD and 2.6 percent for IWTD (at all grade levels). There were no triggers for time-off awards. However, there were triggers for IWD for cash awards of \$4,000 or more: IWD accounted for 9.0 percent of those receiving awards between \$4,000 to \$4,999 and 8.6 percent of those receiving awards of \$5,000 and above. IWTD accounted 1.5 percent and 1.7 percent, respectively, of individuals in those award categories. NASA will continue to monitor the IWD and IWTD inclusion rates for awards. (See Table J1 below.)

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving IWD/IWTD for quality step increases or performance-based pay increases? If yes, describe the trigger(s).

a. Pay Increases (IWD) Yes No X
 c. Pay Increases (IWTD) Yes X No

IWTD accounted for 1.4 percent of those receiving quality step increases. (See Table J1.)

3. If the agency has other types of employee recognition programs, are IWD/IWTD recognized disproportionately less than employees without disabilities? (The benchmark is the inclusion rate.) If yes, describe the recognition program and relevant data.

a. Other Types of Recognition (IWD) Yes No X N/A
 b. Other Types of Recognition (IWTD) Yes No X N/A

There were no significant triggers regarding other types of performance awards. (See Table J1.)

Table J1. Employee Awards and Recognition

		IWD	IWTD
Inclusion Rates (all Grades)		11.6%	2.6%
Type of Award:			
Time Off Awards	1-10 hours	14.5%	3.2%
	11-20 hours	12.3%	2.5%
	21-30 hours	10.7%	1.8%
	31-40 hours	13.4%	2.5%
	41 or more hours	14.2%	1.8%
Cash Awards	\$500 and Under	14.4%	2.5%
	\$501 - 999	15.7%	2.8%
	\$1000 - \$1999	14.2%	2.7%
	\$2000 - \$2999	11.1%	2.0%
	\$3000 - \$3999	10.4%	1.8%
	\$4000 - \$4999	9.0%	1.5%
	\$5000 or More	8.6%	1.7%
Other Awards	Performance Award	10.4%	2.0%
	Quality Step Increase	10.9%	1.4%

Source: NASA MD-715 Table B-9, prepared by Department of the Interior (DOI); data as of 9/30/2022. Data include permanent employees only. Triggers highlighted in yellow.

D. Promotions

1. Does your agency have a trigger involving IWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The 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).
 - a. SES
 - i. Qualified Internal Applicants (IWD) Yes No **X**
 - ii. Internal Selections (IWD) Yes No **X**
 - b. Grade GS-15
 - i. Qualified Internal Applicants (IWD) Yes No **X**
 - ii. Internal Selections (IWD) Yes No **X**
 - c. Grade GS-14
 - i. Qualified Internal Applicants (IWD) Yes No **X**
 - ii. Internal Selections (IWD) Yes No **X**
 - d. Grade GS-13
 - i. Qualified Internal Applicants (IWD) Yes No **X**
 - ii. Internal Selections (IWD) Yes No **X**

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to develop new reports and will evaluate the data when available.

2. Does your agency have a trigger involving IWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The 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).

- a. SES
 - i. Qualified Internal Applicants (IWTD) Yes No N/A X
 - ii. Internal Selections (IWTD) Yes No N/A X
- b. Grade GS-15
 - i. Qualified Internal Applicants (IWTD) Yes No N/A X
 - ii. Internal Selections (IWTD) Yes No N/A X
- c. Grade GS-14
 - i. Qualified Internal Applicants (IWTD) Yes No N/A X
 - ii. Internal Selections (IWTD) Yes No N/A X
- d. Grade GS-13
 - i. Qualified Internal Applicants (IWTD) Yes No N/A X
 - ii. Internal Selections (IWTD) Yes No N/A X

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to develop new reports and will evaluate the data when available.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving IWD 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 (IWD) Yes No N/A X
- b. New Hires to GS-15 (IWD) Yes No N/A X
- c. New Hires to GS-14 (IWD) Yes No N/A X
- d. New Hires to GS-13 (IWD) Yes No N/A X

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to develop new reports and will evaluate the data when available.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving IWTD 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 (IWTD) Yes No N/A X
- b. New Hires to GS-15 (IWTD) Yes No N/A X
- c. New Hires to GS-14 (IWTD) Yes No N/A X
- d. New Hires to GS-13 (IWTD) Yes No N/A X

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to develop new reports and will evaluate the data when available.

5. Does your agency have a trigger involving IWD 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.

- a. Executives
 - i. Qualified Internal Applicants (IWD) Yes No N/A **X**
 - ii. Internal Selections (IWD) Yes No N/A **X**
- b. Managers
 - i. Qualified Internal Applicants (IWD) Yes No N/A **X**
 - ii. Internal Selections (IWD) Yes No N/A **X**
- c. Supervisors
 - i. Qualified Internal Applicants (IWD) Yes No N/A **X**
 - ii. Internal Selections (IWD) Yes No N/A **X**

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to develop new reports and will evaluate the data when available.

6. Does your agency have a trigger involving IWTB 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.

- a. Executives
 - i. Qualified Internal Applicants (IWTB) Yes No N/A **X**
 - ii. Internal Selections (IWTB) Yes No N/A **X**
- b. Managers
 - i. Qualified Internal Applicants (IWTB) Yes No N/A **X**
 - ii. Internal Selections (IWTB) Yes No N/A **X**
- c. Supervisors
 - i. Qualified Internal Applicants (IWTB) Yes No N/A **X**
 - ii. Internal Selections (IWTB) Yes No N/A **X**

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to develop new reports and will evaluate the data when available.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving IWD among selectees for new hires to supervisory positions? If yes, describe the trigger(s) in text box.

- a. New Hires for Executives (IWD) Yes No N/A **X**
- b. New Hires for Managers (IWD) Yes No N/A **X**
- c. New Hires for Supervisors (IWD) Yes No N/A **X**

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to develop new reports and will evaluate the data when available.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving IWTB among the selectees for new hires to supervisory positions? If yes, describe the trigger(s).

a. New Hires for Executives (IWTD)	Yes	No	N/A X
b. New Hires for Managers (IWTD)	Yes	No	N/A X
c. New Hires for Supervisors (IWTD)	Yes	No	N/A X

Data not yet available. NASA implemented a new staffing solution in FY 2021; applicant flow data reports are not yet available from the system. NASA continues to develop new reports and will evaluate the data when available.

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 personal assistance services.

A. Voluntary and Involuntary Separations

- In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 CFR. § 213.3102(u)(6)(i))? If no, please explain why the agency did not convert all eligible Schedule A employees.

Yes No **X** N/A

Of the 70 Schedule A hires with disabilities eligible for conversion (FY 2020 permanent Schedule A hires with satisfactory service), 20 were not converted. Of those not converted, two were transferred to other Centers and one was reassigned to a different organization.

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

a. Voluntary Separations (IWD)	Yes	No X
b. Involuntary Separations (IWD)	Yes	No X

IWD accounted for 33.3 percent of involuntary separations (5 of 15), which is higher than the inclusion rate for IWD of 11.6 percent; however, the small number of involuntary separations renders trigger analysis less meaningful. NASA will continue to monitor the IWD inclusion rate for separations. (See Table J2.)

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

a. Voluntary Separations (IWTD)	Yes	No X
b. Involuntary Separations (IWTD)	Yes	No X

Separations represent a small percentage of the total NASA workforce; thus, trigger identification is not meaningful. (See Table J2.)

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

Separations represent a small percentage of the total NASA workforce; thus, trigger identification is not meaningful. (See Table J2.)

Table J2. Separations by Disability Status

Separation Type		Total	IWD	IWTD
Inclusion Rate	%	100.0%	11.6%	2.6%
Removal (Involuntary)	#	15	5	1
	%	100.0%	33.3%	6.7%
Resignation (Voluntary)	#	304	30	7
	%	100.0%	9.9%	2.3%
Total Separations	#	1,212	170	34
	%	100.0%	14.0%	2.8%

Source: NASA MD-715 Table B-1 (losses), prepared by Department of the Interior (DOI); data as of 9/30/2022. Data include permanent employees only. Triggers highlighted in yellow.

B. Accessibility of Technology and Facilities

Pursuant to 29 CFR. § 1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

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

Website: https://www.nasa.gov/accessibility/section508/sec508_overview.html

- Please provide the internet address on the agency’s public Web site for its notice explaining employees’ and applicants’ rights under the ABA, including a description of how to file a complaint.

Website: https://www.nasa.gov/sites/default/files/atoms/files/aba_statement_final_tagged.pdf

- 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 facilities and/or technology.

NASA maintains an Agency-wide multi-year implementation plan that identifies the facility accessibility needs of each NASA Center. Agency leadership routinely reviews this plan and assesses status. The facilities team creates an annual Architectural Barriers Act report on all Center facility accessibility deficits and progress. The Agency-level DPM has held several information sessions with the Facilities Engineering Division to discuss Architectural Barriers Act (ABA) requirements and related legal authorities. The NASA Section 508 Program Manager continues to host monthly meetings for Center 508 Coordinators to stay abreast of current updates and events related to accessibility. In FY

2022, the DEP hosted OCIO’s 508 Coordinators for a training for the workforce on how to ensure documents are 508 Compliant.

NASA OCIO maintains a webpage of all accessibility technology options across NASA. This page is available to employees and managers, as well as to applicants and the public. The NASA 508 Program Managers Coordination group developed a 508-accessibility scanning tool to standardize the process to scan NASA websites to identify and correct compliance issues. Currently, OCIO is developing a Self-Service Project to assist end-users with their accessibility technology needs. In FY22, ODEO’s DEP participated on a hiring panel for a new position for the lead in OCIO’s Accessibility Customer Engagement Program, as a part of a proactive effort by OCIO to enhance 508 Compliance across the Agency. As part of NASA’s DEIA Plan for FY 2023, ODEO coordinated with OCIO on a memo to the workforce, sent on October 18, 2022, that communicated Agency roles and responsibilities for 508 Compliance, as well as expectations of NASA employees.

At the Center-level, DPMs manage all RA requests, including technology accessibility issues, acting as liaisons between employees requiring accessibility technology and OCIO.

C. Reasonable Accommodation Program

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

1. Please provide the average timeframe for processing initial requests for reasonable accommodations during the reporting period. (Do not include previously approved requests with repetitive accommodations, such as interpreting services.)

In FY 2022, NASA RA processing average was 25 days. (See Table J3 for average processing time by NASA Center.)

Table J3. Average Processing Times for RA Requests

Center	Average No. of Days
Ames Research Center	14
Armstrong Flight Research Center	20.5
Glenn Research Center	44
Goddard Space Flight Center	35
Headquarters	19
Johnson Space Center	18
Kennedy Space Center	25
Langley Research Center	10
Marshall Space Flight Center	11
NASA Shared Services Center	20.9
Stennis Space Center	11

Source: NASA RAMS, data for FY 2022.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency’s reasonable accommodation program. 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.

NASA routinely provides RA awareness briefings to new employees, new supervisors, and interns. In FY 2022, NASA Centers trained more than 800 employees on their roles and responsibilities regarding RA, including at least 242 managers and supervisors and, additionally, at least 86 new managers and supervisors. Further, ODEO DEP presents a session on Reasonable Accommodation at OCHCO’s quarterly HR101 trainings for new managers and supervisors across the Agency. In addition, all ten NASA Centers have designated DPMs to process RA requests and to provide technical assistance to employees, interns, managers, and supervisors. Also, NASA is in the process of adopting a new Reasonable Accommodation Management System (RAMS), by which the Agency expects to increase timeliness and efficiency in processing requests. The RAMS tool will allow Agency leadership to better monitor timeliness trends in RA processing.

In FY 2022, ODEO created a Disability and Accessibility presentation and information package for OSTEM and Pathways interns, which contained information and resources on RA. This packet of information will be given to all interns in every new cohort.

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

NASA has an Agency-wide BPA for personal assistance services (PAS), for greater efficiency and consistency in providing PAS across the Agency. Each Center has a PAS technical monitor to ensure timely PAS processing and services. The Agency-level DPM monitors requests for trends and acts as the Contracting Officer’s Representative to the PAS BPA to monitor contractor timeliness and quality. NASA includes policy and procedures on PAS in its extensive NPR 3713.1C, Reasonable Accommodations Procedures for Individuals with Disabilities.

Section VI: EEO Complaint and Findings Data

A. EEO Complaint Data Involving Harassment

1. During the last fiscal year, did a higher percentage of IWD file a formal EEO complaint alleging harassment, as compared to the government-wide average of 19.7 percent?
Yes No **X** N/A

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 **X** N/A

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.

N/A – There were no findings.

B. EEO Complaint Data Involving Reasonable Accommodation

1. During the last fiscal year, did a higher percentage of IWD file a formal EEO complaint alleging failure to provide an RA, as compared to the government-wide average of 13.5 percent?

Yes No **X** N/A

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

Yes No **X** N/A

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

N/A – There were no findings.

Section VII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

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

Yes No **X**

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

Yes No N/A **X**

3. Identify each trigger and plan to remove the barrier(s), including the barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

MD-715 PART J	Affirmative Action Plan for Individuals with Disabilities
Triggers	<p>The preceding analyses revealed the following triggers:</p> <ul style="list-style-type: none"> • <u>Performance Awards</u>: There were triggers for cash awards of \$4,000 or more (see Part J, section IV, C). • <u>Separations</u>: Although the number of separations is small, there may be triggers for separations of IWD (see Part J, section V, A). • <u>Schedule A Conversions</u>: Not all FY 2020 Schedule A hires were converted to permanent positions with two years (see Part J, section V, A).

	Due to the implementation of a new staffing solution, applicant flow data were not available for FY 2022. NASA will continue to monitor triggers and initiate appropriate action and activities if trends develop.			
Source of Trigger	Workforce data tables.			
Groups Affected	Individuals with Disabilities and Individuals with Targeted Disabilities.			
Sources Reviewed	Workforce data tables, complaints data, and FEVS data.			
Status of Barrier Analysis Process	Barrier analysis not yet completed.			
Objective(s) for the EEO Plan	Improve the monitoring of IWD and IWTD employment at NASA through the following: (1) obtain additional data and conduct further analyses to determine causes of differences observed in the data categories described above and the causes for such differences; and (2) develop improved systems for collecting demographic data pertaining to career development programs.			
Plan to Address Barriers/Triggers Identified				
Responsible Official(s)			Performance Standards Address the Plan? (Yes or No)	
Director, Diversity and Data/Analytics Division, ODEO			No; DEIA generally addressed.	
Target Date	Planned Activities	Sufficient Staffing & Funding	Modified Date	Completion Date
9/30/2021	Investigate reasons for differences between the IWD inclusion rates and hiring/promotion rates of IWD and IWTD in mission critical occupations.	Yes	9/30/2023	
5/30/2022	Create presentation, video, and packet of information on disability and accessibility for OSTEM and Pathways interns with disabilities	Yes		5/30/2022
9/30/2022	Develop on-going training regarding the NASA Disability Employment Program and reasonable accommodations			9/30/2022
9/30/2022	Award Agency-wide Sign Language Interpretation Blanket Purchasing Agreement	Yes		9/9/2022
10/31/2022	Issue memo on 508 Compliance to the workforce	Yes		10/18/2022
1/31/2023	Implement new Reasonable Accommodations Management System	Yes		
9/30/2023	Collaborate with OCIO's Accessibility Customer Service Program to enhance accessibility technology customer support for end users.	Yes		
Fiscal Year	Accomplishments			
FY 2022	In October 2021, the DEP held 2 Agency-wide Reasonable Accommodation trainings – one for managers/supervisors and one for employees, trainings on how to ensure 508			

Compliance in your documents – both Word Suite and PDFs, and a lunch-and-learn on Deaf Etiquette – with a lesson in American Sign Language. In addition, NASA developed a section on RA requirements for OCHCO’s quarterly HR101 training and conducted Center RA trainings throughout the year.

On September 9, 2022, NASA awarded the first-ever Agency-wide SLI BPA. The SLI BPA will enable consistency in the services NASA provides its deaf/hard-of-hearing employees, interns, applicants, and guests – no matter the individual’s geographical location within the Agency.

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

Due to the allocation of resources focusing on developing the NASA DEIA Strategic Plan in adherence to Executive Order requirements, NASA was unable to complete the analysis of hiring and promotion rates of IWD and IWTD in mission critical occupations. However, as part of the key priority goals in the DEIA Strategic Plan, NASA has begun work on obtaining data (including applicant flow data) and developing automated applications to enhance barrier analysis.

A large portion of FY 2022 also was spent working toward compliance with the Executive Order mandating that all Federal employees were vaccinated against COVID. Immeasurable labor hours and resources were expended in creating new policies and procedures and new standard forms; communicating with an anxious workforce and creating FAQs; processing medical and religious RA request for approximately 1200 employees; and participating in multiple weekly meetings with the Administrator’s Office, OGC, OCHCO, the Office of the Chief Health and Medical Officer, and union representatives. Considering such an extremely challenging year for Center RA Managers in dealing with the inundation of religious and medical Covid vaccination RAs, as well as the peripheral influx of testing, masking, and remote work RA requests after the court’s order for abeyance, the expediency of Center RA Managers in achieving an average RA processing time that is still under the policy demand of 30 days is to be commended.

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

NASA’s Agency-level award of an SLI BPA is a tremendous step toward ensuring equity in services for NASA’s deaf/hard-of-hearing workforce, no matter where an employee is located geographically. The creation of a Disability and Accessibility presentation and packet of information for OSTEM and Pathways interns will enhance NASA’s support for individuals with disabilities in the STEM pipeline. This is especially significant for NASA, as it is through our intern programs that many early career hires are made.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

N/A

APPENDIX A: DATA ANALYSES

Note: The tables below are a subset of the tables provided to EEOC with the annual MD-715 submission; these tables were created for the purposes of conducting barrier and trigger analyses.

Workforce Summary

External Benchmarks

The U.S. Equal Employment Opportunity Commission (EEOC) requires agencies to compare the demographic profile of its employees to external benchmarks, such as the Civilian Labor Force (CLF) and “alternative” benchmarks that may be more suitable comparators.⁴ Thus, NASA also benchmarks its workforce against the Federal STEM workforce.

Table 1. FY 2022 NASA Workforce and Comparison Populations

NASA Workforce	AAPI	Black	Hispanic	AIAN	White	Multi-Racial	Undeclared	Male	Female
All NASA Employees	8.9%	10.8%	8.8%	0.9%	69.1%	0.4%	1.1%	64.4%	35.6%
Alternate Benchmarks (Comparison Populations)									
Civilian Labor Force	4.6%	12.3%	13.0%	0.6%	67.5%	2.1%	--	51.8%	48.2%
Federal STEM Workforce	9.9%	10.4%	6.6%	0.8%	69.8%	2.1%	0.4%	69.3%	30.7%

Sources: NASA Personnel Data Warehouse (PDW) (data as of 09/30/2022); Office of Personnel Management (OPM), FedScope, Federal Human Resources Data, Diversity Cube and Employment Cube (U.S.-based employees only) (data as of 6/30/2022, the most recent data available), accessed at <<https://www.fedscope.opm.gov>>; U.S. Census Bureau, EEO Tabulation 2014-18 (American Community Survey data set EEO-CIT02R), accessed at <<https://www.census.gov/topics/employment/equal-employment-opportunity-tabulation.html>>.

Table 1 shows that the composition of the NASA workforce by race, ethnicity, and gender is similar to the CLF, with three exceptions: (1) NASA employs a higher percentage of AAPI (8.9 percent) than their representation in the RCLF (4.6 percent); (2) NASA has a lower percentage of Hispanics (8.8 percent) than the RCLF (13.0 percent); (3) the representation of women in the NASA workforce (35.6 percent) is lower than their representation in the CLF (48.2 percent).

Because the NASA workforce is highly specialized (two-thirds of NASA employees are in science and engineering (S&E) occupations) and the CLF includes all occupations in the country, a comparison to the CLF may not provide a full picture of how well NASA is doing with regard to diversity.⁵ Using the Federal STEM workforce provides a different viewpoint. In fact, comparing NASA to the Federal STEM workforce reveals few differences. NASA’s workforce is similar to the Federal STEM workforce with

⁴ According to EEOC guidance, the total agency workforce should be compared to the CLF, which includes all non-institutionalized civilians aged 16 and over who are either employed or unemployed. U.S. Census Bureau, “Labor Force: Glossary,” accessed at <<https://www.census.gov/topics/employment/labor-force/about/glossary.html>>. Subgroups of the agency workforce (e.g., those in senior grades) should be compared to overall agency workforce. EEOC also notes that “Agencies can use alternative benchmarks that are more appropriate for their workforce.” EEOC, *Instructions to Federal Agencies for EEO MD-715*, Section II, “Barrier Identification and Elimination,” and Section IV, “Interpretation and Completion of Workforce Data Tables,” accessed at: <<https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eeo-md-715-0>>.

⁵ A disparity between an agency’s workforce and the CLF does suggest the need for action; however, in many cases that action is a long-term, societal-level change of increasing opportunities for individuals to enter occupations specific to the agency.

the exception of the employment of Hispanics and women, who are employed at a higher percentage at NASA: Hispanics account for 8.8 percent of the NASA workforce compared to 6.4 percent in the Federal STEM workforce; women are 35.6 percent of the NASA workforce and 30.2 percent of the Federal STEM workforce.

Nonetheless, data for the Federal STEM workforce only includes STEM positions (some of which are not present in the NASA workforce) and does not include positions such as management analysts and contract specialists. Thus, in FY 2022, NASA developed an alternative benchmark to better understand how the demographic composition of the NASA workforce compares to an Organizational CLF (OCLF), which is comprised of only those occupations present in the NASA workforce.⁶ The OCLF is a weighted average of the RCLF for each occupation present in the Agency; it indicates what NASA would look like demographically if it were hiring individuals in the same proportion as they are in the qualified applicant pool for the occupations in the NASA workforce (i.e., the RCLF). This metric is designed to bridge the gap between the non-specific CLF metric and the occupation-specific RCLF metrics (the RCLF is discussed below).

Internal Benchmark

Per EEOC guidance, agencies also should compare subgroups of their workforce to the total workforce when doing trigger analysis.⁷ Table 2 reveals the following triggers⁸ (highlighted in yellow) for some traditionally underrepresented groups at NASA, when compared to their total representation:

- **Asian Americans and Pacific Islanders (AAPI)** are underrepresented in SES and SL positions (4.8 percent and 4.1 percent, respectively) compared to their overall participation in the NASA workforce (8.9 percent). AAPI employees also are underrepresented in supervisory positions, in which they account for 5.6 percent.
- **Blacks and African Americans** are underrepresented in ST, SL, and student positions (1.3 percent, 1.0 percent, and 7.7 percent), compared to their overall participation in the NASA workforce (10.8 percent).
- **Hispanics and Latinos** are underrepresented in SES, ST, and SL positions (5.3 percent, 3.8 percent, and 6.2 percent, respectively) compared to their overall participation in the NASA workforce (8.8 percent). Hispanics also are underrepresented in supervisory positions, in which they account for 6.8 percent.

⁶ Similar benchmarks have been developed by other Federal agencies, including the U.S. Department of the Navy and the U.S. Department of Homeland Security.

⁷ EEOC, *Instructions to Federal Agencies for EEO MD-715*, Section IV, "Interpretation and Completion of Workforce Data Tables," accessed at: <<https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eeo-md-715-0>>.

⁸ According to EEOC, a low participation rate for any group (in relation to a benchmark) is a "trigger" – EEOC defines a "trigger" as "a trend, disparity, or anomaly that suggests the need for further inquiry into a particular policy, practice, procedure, or condition" to determine if there are barriers to equal employment opportunity. In other words, low participation (or representation) of a group in certain occupations, or among employees receiving promotions, awards, etc., may indicate that there is an agency policy or practice that limits the full participation of that group. A trigger does not by itself demonstrate a barrier to equal opportunity; it indicates an area to be monitored or further analyzed. EEOC does not prescribe tests of statistical significance or other statistical tests to determine "underrepresentation," leaving it instead to agencies to determine their level of tolerance. For larger groups, NASA uses a standard of a two-percentage point difference from the benchmark when identifying triggers. EEOC, *Instructions to Federal Agencies for EEO MD-715*, "Section II: Barrier Identification and Elimination," accessed at <<https://www.eeoc.gov/federal/directives/715instruct/>>.

- **American Indians and Alaska Natives (AIAN)** represent 0.9 percent of the NASA workforce. Their small number (160 AIAN individuals are employed by NASA), renders comparisons of smaller subgroups to their total employment less meaningful.
- **Women** are underrepresented in ST, SL, and GS-14/GS-15 positions (21.5 percent, 19.6 percent, and 31.7 percent, respectively) compared to their overall representation in the NASA workforce (35.6 percent).

These triggers are the same triggers identified in FY 2021.

Table 2. NASA Employees (Selected Groups) by Race, Ethnicity, and Gender: FY 2022

NASA Workforce	Total Number	AAPI	Black	Hispanic	AIAN	White	Multi-Racial	Undeclared	Male	Female
All Employees:	18,199	8.9%	10.8%	8.8%	0.9%	69.1%	0.4%	1.1%	64.4%	35.6%
Permanent	16,319	8.4%	11.2%	8.5%	0.9%	70.0%	0.4%	0.5%	65.0%	35.0%
Temporary	1,321	11.5%	7.7%	10.1%	0.5%	63.6%	0.4%	6.3%	58.9%	41.1%
Students	559	15.9%	7.7%	14.3%	0.2%	55.3%	0.5%	6.1%	62.4%	37.6%
All Employees, by Grade:										
SES/Other Executives	433	4.8%	10.4%	5.3%	0.5%	78.1%	0.7%	0.2%	63.5%	36.5%
ST	79	12.7%	1.3%	3.8%	0.0%	82.3%	0.0%	0.0%	78.5%	21.5%
SL	97	4.1%	1.0%	6.2%	2.1%	86.6%	0.0%	0.0%	80.4%	19.6%
GS-14 – GS-15	9,824	8.8%	9.4%	7.5%	0.8%	72.6%	0.3%	0.6%	68.3%	31.7%
GS-13 and below	7,638	9.2%	12.9%	10.9%	1.1%	63.7%	0.6%	1.8%	59.2%	40.8%
All Other Pay Rates	128	8.6%	5.5%	7.0%	0.0%	72.7%	0.0%	6.3%	63.3%	36.7%
Other Groups:										
Supervisors	2,243	5.6%	13.3%	6.8%	0.5%	73.0%	0.5%	0.3%	63.0%	37.0%

Source: NASA Personnel Data Warehouse (PDW) (data as of 09/30/2022). Triggers are highlighted in yellow. “All Other Pay Rates” include: pay rates for Advisory Committee Members, Experts, and Consultants, and administratively determined rates. “Students” are interns hired through OPM’s Pathways program.

The percentage of minorities and women decreases as grade levels increase. For example, in FY 2022, Hispanics and Latinos accounted for 10.9 percent of NASA employees at grades GS-13 and below, 7.5 percent at grades GS-14 and GS-15, and 5.3 percent of the SES. Women account for 40.8 percent of those in grades GS-13 and below, 31.7 percent in grades GS-14 and GS-15, and 36.5 percent of those in the SES. Although the percentages of minorities and women at each age group has increased slightly since FY 2017, this trend has remained. (See Figures 1 and 2.) In FY 2023, NASA plans to begin a barrier analysis to determine the root cause of this trend.

Figure 1. NASA Workforce by Race/Ethnicity and Grade Category: FY 2022

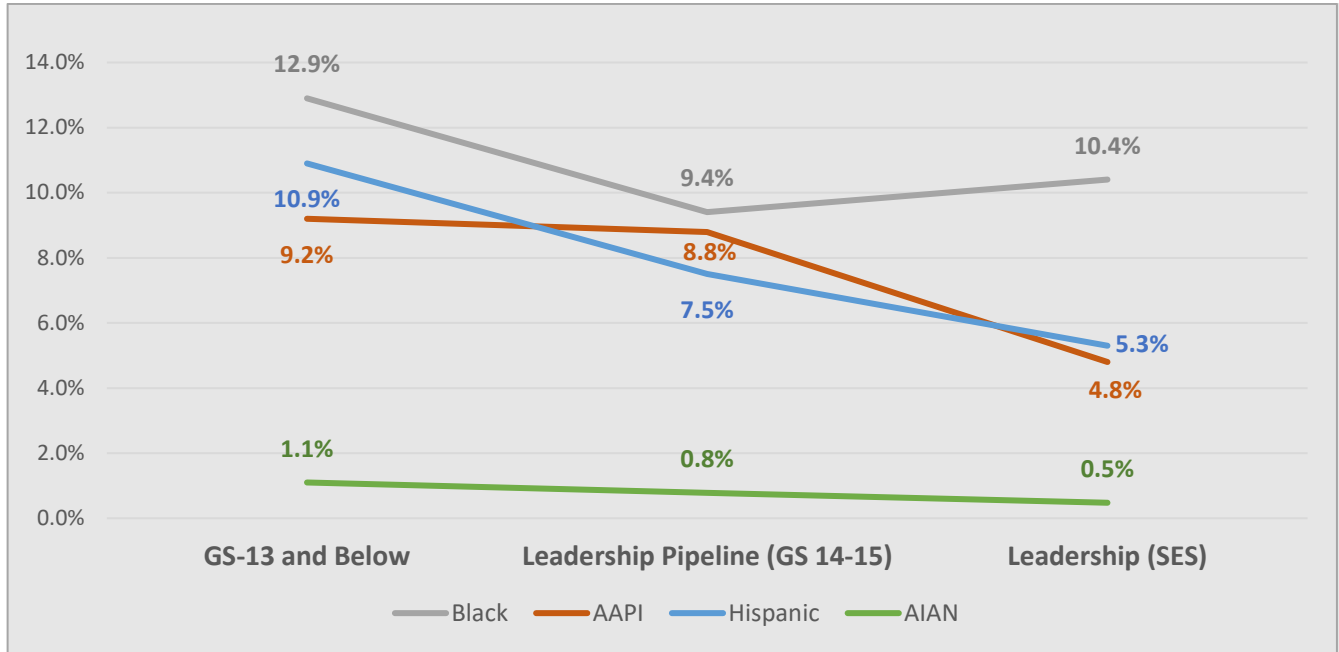
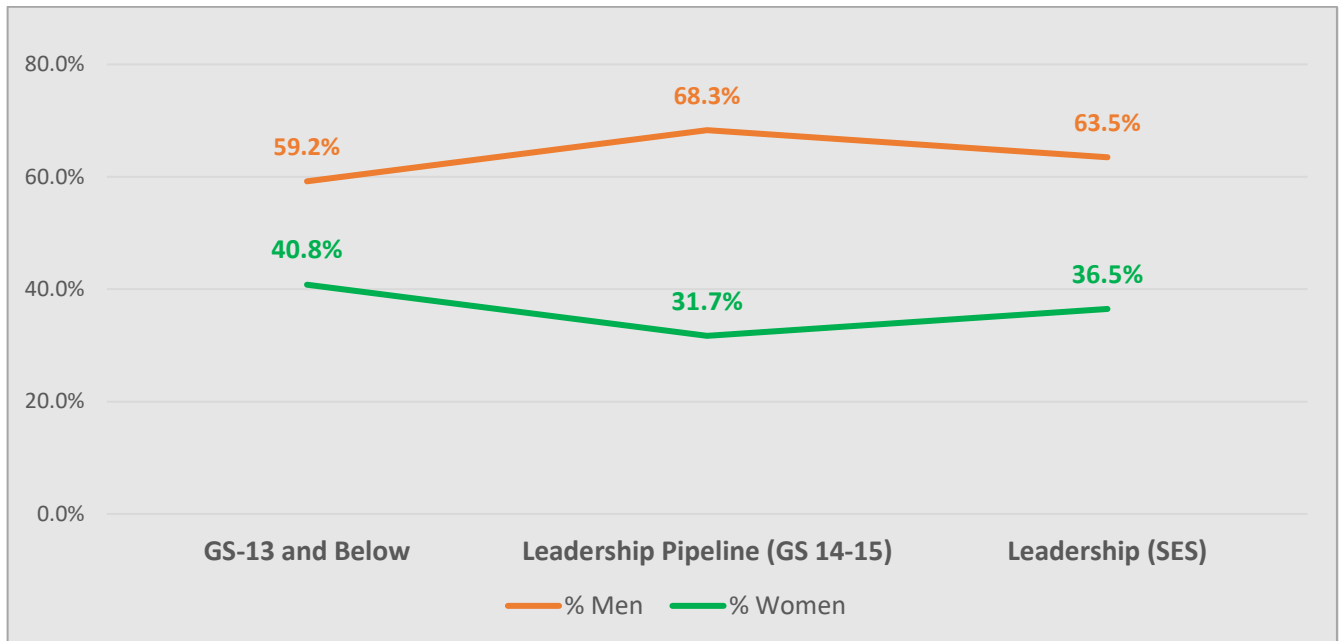


Figure 2. NASA Workforce by Gender and Grade Category: FY 2022



Source for Figures 1 and 2: NASA PDW (data as of 9/30/2022).

Occupational Categories

Because the NASA workforce is highly specialized, it is useful to compare employees in specific occupations to the individuals in the civilian labor force in similar occupations (the RCLF). Employment ratios below the RCLF for any group is another trigger.⁹ Tables 3 and 4 reveal the following:

- In most NASA mission critical occupations, minorities and women are employed at higher percentages at NASA than in the RCLF. In fact, there are no triggers by race, ethnicity, or gender for Electrical Engineers, Electronics Engineers, Aerospace Engineers, Space Scientists, General Administrative positions, Management and Program Analysts, and Contract Specialists. However, the following triggers were observed:
 - **Asian American and Pacific Islanders** are employed in lower percentages at NASA than in the RCLF in General Engineering, Computer Engineering, and Physical Science positions.
 - AAPI account for 7.1 percent of General Engineering positions at NASA and 12.1 percent in the RCLF.
 - Similarly, AAPI are 14.2 percent of NASA Computer Engineers, though they account for 19.1 percent in the RCLF.
 - AAPI account for 14.1 percent of Physical Scientists at NASA and 16.4 percent in the RCLF. (In FY 2022, NASA completed its barrier analysis of AAPI and Women in Physical Science positions; see Appendix B.)
 - **Hispanics** are underrepresented in Finance, occupying 7.3 percent of such positions at NASA and 9.8 percent in the RCLF.
 - There is only one **American Indian or Alaska Native** in a Physical Science position at NASA and only 2 AIAN individuals in Finance positions.
 - **Women** account for 32.6 percent of Physical Scientists at NASA and 43.4 percent of those in the RCLF.
- Compared to the RCLF, AAPI, Blacks, Hispanics, and Women are overrepresented in several Professional Administrative (PA) occupations, including Information Technology Specialists and Accountants, and Whites and males are underrepresented. However, because Whites and males account for the majority of employees in those occupations, these are not considered triggers for the purpose of barrier analysis.

⁹ EEOC requires agencies to use representation in the agency workforce as the comparison group when analyzing representation by grade level and supervisory status, and in promotions, hiring, etc., such as in Table 1. When analyzing individuals by occupation, EEOC requires the use of the RCLF, which is comprised of occupations similar to occupations in the agency. EEOC, *Instructions to Federal Agencies for EEO MD-715*, "Guidance for Completing the EEOC FORM 715-01 Workforce Data Tables," accessed at <<https://www.eeoc.gov/federal/directives/715instruct/>>.

Table 3. NASA Mission Critical S&E Occupations by Race, Ethnicity, and Gender: FY 2022

		AAPI	Black	Hispanic	Multi-racial	AIAN	White	Undeclared	Male	Female
0801 - General Engineer (n=3,391)	NASA:	7.1%	6.4%	8.3%	1.0%	0.4%	76.1%	0.9%	70.6%	29.4%
	RCLF:	12.1%	4.8%	6.9%	2.0%	0.2%	74.0%	--	87.1%	12.9%
0850 - Electrical Engineer (n=330)	NASA:	13.3%	7.6%	13.3%	0.9%	0.3%	64.2%	0.3%	83.9%	16.1%
	RCLF:	12.1%	5.6%	7.3%	2.1%	0.2%	72.8%	--	91.1%	8.9%
0854 - Computer Engineer (n=718)	NASA:	14.2%	9.3%	9.5%	0.6%	0.4%	65.6%	0.4%	73.0%	27.0%
	RCLF:	19.0%	8.4%	6.7%	1.7%	0.1%	64.2%	--	85.9%	14.1%
0855 - Electronics Engineer (n=786)	NASA:	16.7%	6.0%	9.8%	0.5%	0.1%	66.0%	0.9%	84.2%	15.8%
	RCLF:	12.1%	5.6%	7.3%	2.1%	0.2%	72.8%	--	91.1%	8.9%
0861 - Aerospace Engineer (n=4,429)	NASA:	9.6%	5.9%	8.5%	0.6%	0.2%	74.3%	0.8%	77.4%	22.6%
	RCLF:	11.2%	4.2%	7.8%	2.4%	0.3%	74.1%	--	87.4%	12.6%
1301 - Physical Scientist (n=460)	NASA:	14.1%	2.8%	5.9%	0.2%	0.0%	75.7%	1.3%	67.4%	32.6%
	RCLF:	16.4%	3.8%	5.6%	2.3%	0.2%	71.8%	--	56.6%	43.4%
1330 - Space Scientist (n=335)	NASA:	7.8%	1.8%	6.6%	0.0%	0.0%	83.3%	0.6%	69.0%	31.3%
	RCLF:	8.6%	3.6%	4.7%	1.8%	0.2%	81.0%	--	81.0%	19.0%

Table 4. NASA Mission Critical and Other Professional Administrative Occupations by Race, Ethnicity, and Gender: FY 2022

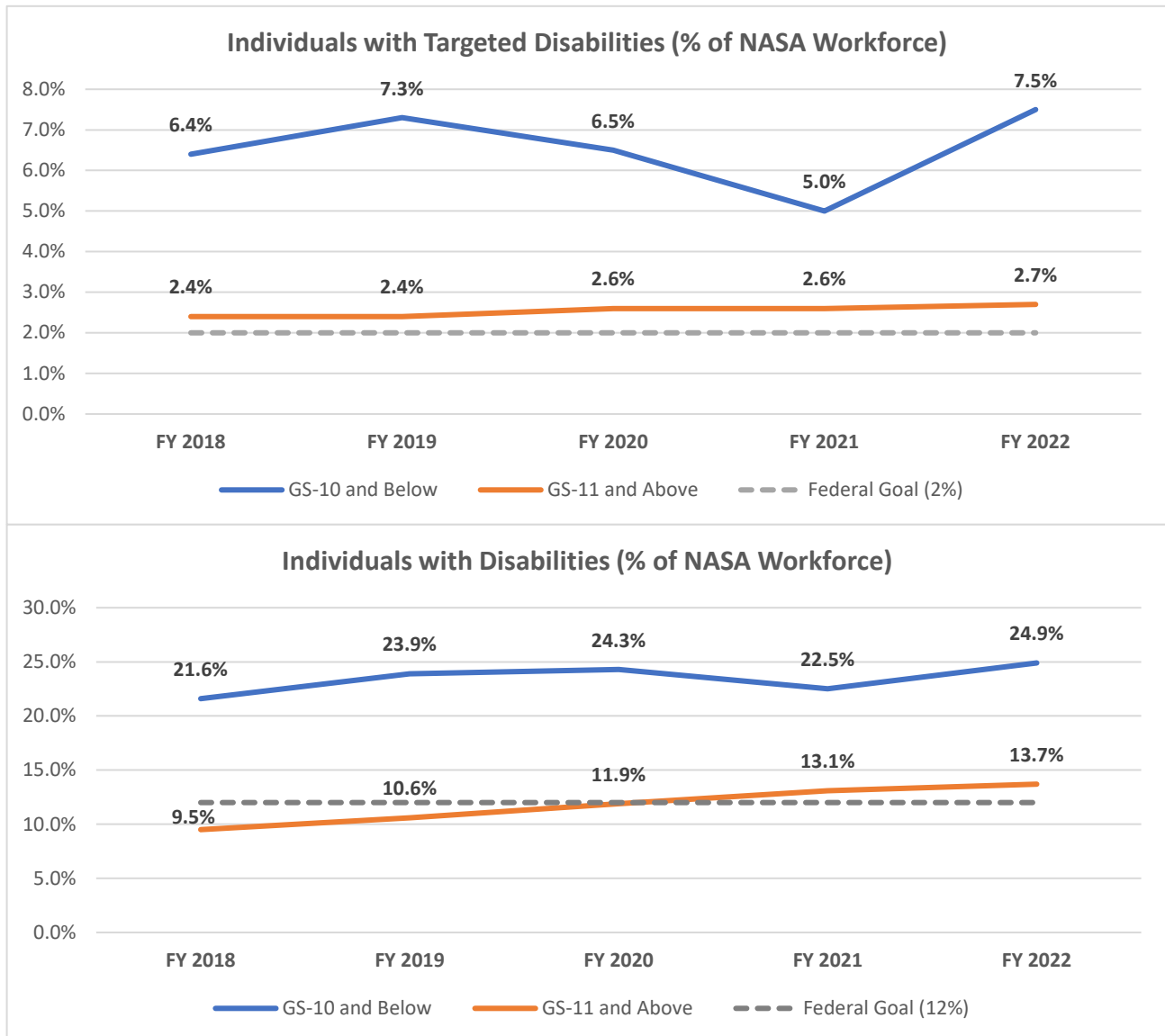
		AAPI	Black	Hispanic	Multi-racial	AIAN	White	Undeclared	Male	Female
0301 - General Administrative (n=930)	NASA:	4.9%	19.2%	7.4%	1.3%	1.0%	64.8%	1.3%	38.0%	62.0%
	RCLF:	6.3%	12.5%	8.7%	0.6%	1.0%	70.9%	--	36.7%	63.3%
0343 - Management and Program Analyst (n=838)	NASA:	7.5%	16.7%	11.9%	1.3%	0.4%	61.2%	1.0%	34.8%	65.2%
	RCLF:	5.9%	6.8%	4.6%	0.5%	0.6%	81.6%	--	58.4%	41.6%
0501 - Finance (n=301)	NASA:	6.6%	21.6%	7.3%	0.7%	0.0%	63.8%	0.0%	29.6%	70.4%
	RCLF:	5.0%	12.3%	9.8%	0.5%	1.2%	71.1%	--	43.7%	56.3%
0510 - Accountant (n=289)	NASA:	12.8%	31.1%	8.7%	1.0%	0.0%	46.0%	0.3%	30.4%	69.6%
	RCLF:	8.6%	8.1%	6.1%	0.5%	0.6%	76.0%	--	39.9%	60.1%
1102 - Contract Specialist (n=740)	NASA:	7.0%	25.3%	10.7%	0.8%	0.5%	54.1%	1.6%	40.7%	59.3%
	RCLF:	3.3%	8.5%	7.1%	0.4%	0.8%	80.0%	--	46.2%	53.8%
2210 - Information Technology Specialist (n=556)	NASA:	7.9%	16.0%	7.0%	1.3%	0.9%	65.1%	1.8%	63.1%	36.9%
	RCLF:	6.8%	11.1%	7.6%	0.6%	0.8%	73.1%	--	70.4%	29.6%

Notes for Tables 3 and 4: The table does not include Individuals who did not identify their race/ethnicity; thus, not all groups total to 100 percent. Triggers highlighted in yellow. Sources: NASA PDW (data as of 9/30/2022); U.S. Census Bureau, EEO Tabulation 2014-18 (American Community Survey data set EEO-CIT02R), accessed at <<https://www.census.gov/topics/employment/equal-employment-opportunity-tabulation.html>>.

Individuals with Disabilities

NASA has made progress in achieving Federal goals for the employment of individuals with disabilities over the past five years. NASA exceeds the Federal goal for the employment of IWD and IWTD in grades GS-10 and below and in grades GS-11 and above. (See Figure 3.) NASA continues to monitor the workforce participation of IWD and WITD and encourages individuals to update their disability status on an annual basis.

Figure 3. NASA Employees with Disabilities: FY 2018-22

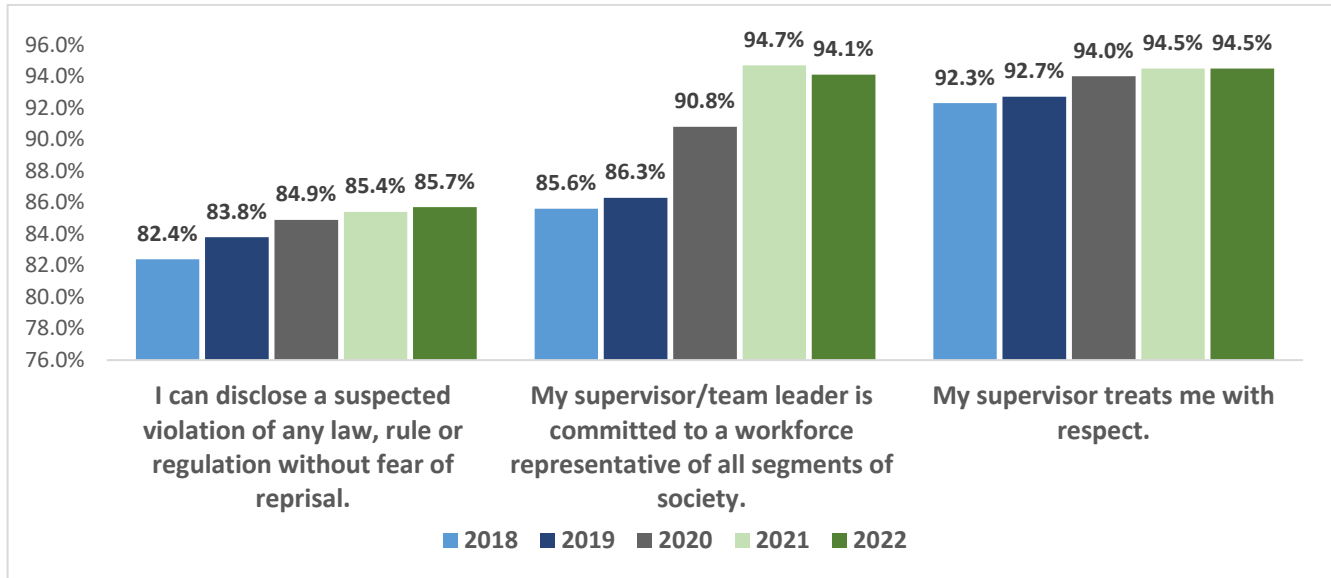


Source: NASA PDW; data as of the last pay period in FY 2022. NASA revised its calculations in September 2020 to better conform with EEOC guidance, which require agencies to report only on full-time permanent employees. Data on IWD and ITWD include individuals who 1) all full-time, permanent non-student employees who identified as having a disability on OPM Standard Form (SF) 256; and 2) full-time, permanent disabled veterans who are classified as “10-Point/Compensable/30 Percent,” but who have not claimed a disability on SF 256 (pursuant to 29 CFR Part 1614, §1614.203(d)(6)(ii) (82 Fed. Reg. 680)).

Federal Employee Viewpoint Survey (FEVS) Results

NASA’s FEVS scores remain high and scores on several questions related to DEIA and compliance have increased over the last five years.¹⁰ For example, between 2018 and 2022, the percentage of employees stating that they agree or strongly agree the question, “My supervisor/team leader is committed to a workforce representative of all segments of society” increased from 85.6 percent to 94.1 percent, peaking at 94.7 percent in 2021 (see Figure 4).

Figure 4. FEVS Questions Focused on DEIA and Compliance: FY 2018-22



Sources: OPM and NASA, FEVS Results (NASA began conducting the FEVS in-house in FY 2021). Percentages represent the percentage of responses that were positive. In FY 2022, there were 13,411 NASA respondents.

In 2022, OPM added several new questions to the FEVS focused on DEIA. An analysis of responses to those questions by demographic groups found that on those several measures, many members of minority groups have less positive responses than the NASA overall scores. For example, the overall NASA response for the question, “My supervisor demonstrates a commitment to workforce diversity (e.g., recruitment, promotion opportunities, development)” was 84.6 percent positive. However, AIAN and Black employees responded much less favorably (74.3 percent positive and 75.8 percent positive, respectively). Further, individuals who responded that they use another term for gender (other than male or female), Transgender individuals, Gay and Lesbian Employees, and individuals who responded they use a different term than the responses provided for sexual orientation had even lower positive responses. A similar pattern in responses was observed for other questions related to DEIA. (See Tables 5 and 6.)

¹⁰ The FEVS is a climate survey conducted by OPM.

Table 5. Selected FEVS Responses by Ethnicity, Race, and Disability Status: FY 2022

FEVS Question	NASA Total	Ethnicity	Race						IWD
		Hispanic	AIAN	Asian	Black	NHOPI	Multi-racial	White	
My organization’s management practices promote diversity (e.g., outreach, recruitment, promotion opportunities).	84.6%	82.1%	74.3%	83.4%	75.8%	82.5%	81.7%	87.7%	80.3%
My supervisor demonstrates a commitment to workforce diversity (e.g., recruitment, promotion opportunities, development).	87.1%	84.3%	84.4%	84.1%	80.6%	78.0%	83.8%	89.9%	83.8%
My supervisor provides opportunities fairly to all employees in my work unit (e.g., promotions, work assignments).	84.9%	84.0%	70.8%	84.5%	80.4%	78.0%	82.0%	87.5%	79.1%
In my work unit, people’s differences are respected.	89.2%	87.6%	79.5%	90.4%	85.5%	80.9%	87.3%	91.2%	83.7%
I can be myself and be successful within my organization.	85.7%	84.6%	77.9%	87.3%	81.3%	83.3%	82.5%	88.1%	78.1%
My organization has an effective process for meeting accessibility needs (e.g., reasonable accommodations)	87.6%	86.8%	83.8%	88.0%	86.8%	80.6%	84.4%	88.9%	82.4%

Table 6. Selected FEVS Responses by Gender, Gender Identity, and Sexual Orientation: FY 2022

FEVS Question	Gender			Gender Identity	Sexual Orientation			
	Male	Female	Another Term	Trans-gender	Straight	Bisexual	Gay or Lesbian	Different Term
My organization’s management practices promote diversity (e.g., outreach, recruitment, promotion opportunities).	87.2%	83.3%	46.5%	50.0%	86.5%	77.4%	76.0%	66.2%
My supervisor demonstrates a commitment to workforce diversity (e.g., recruitment, promotion opportunities, development).	89.3%	86.2%	63.4%	62.9%	88.7%	81.1%	84.3%	72.1%
My supervisor provides opportunities fairly to all employees in my work unit (e.g., promotions, work assignments).	87.6%	83.6%	60.0%	69.7%	86.7%	86.6%	82.2%	70.5%
In my work unit, people’s differences are respected.	91.2%	88.7%	64.9%	65.7%	90.7%	85.0%	84.9%	75.2%
I can be myself and be successful within my organization.	87.9%	85.9%	51.3%	59.5%	87.7%	77.6%	77.8%	69.5%
My organization has an effective process for meeting accessibility needs (e.g., reasonable accommodations)	90.1%	85.9%	54.4%	59.4%	89.1%	79.5%	81.2%	66.7%

Source for Tables 5 and 6: NASA Office of the Chief Human Capital Officer, Federal Employee Viewpoint Survey, 2022. Responses that are more than 2 percentage points below the NASA Total response (in Table 5) are highlighted in yellow.

APPENDIX B: PHYSICAL SCIENCE BARRIER ANALYSIS PLAN AND INITIAL FINDINGS

Barrier Analysis Overview

Purpose: NASA identified workforce triggers¹¹ for Women and Asian Americans and Pacific Islanders (AAPI)¹² within Physical Science occupations, when compared to the RCLF.¹³ Thus, the Agency is undertaking the barrier analysis process to further explore potential underlying causes of these discrepancies in order to determine their root cause. The barrier analysis will focus on the Physical Science jobs with the highest numbers of employees, Physical Scientists (job series 1301), Physicists (job series 1310), and Space Scientists (job series 1330) (see Table 1).

Process Overview: NASA will use a multiphase barrier analysis process to systematically assess representation in the Physical Science Occupational Series. Phase 1 examines general representation of demographic groups within the various Physical Science occupations. Phases 2 and 3 examine existing personnel data, such as data on losses and hires, to further explore the factors that may be contributing to discrepancies discovered in Phase 1. At Phase 4, NASA will deploy a systematic set of questions to gather more information about triggers uncovered in Phases 1-3. In Phases 5-6, the Agency will use qualitative and quantitative data collection techniques to obtain input from members of potentially affected demographic groups. Finally, at Phase 7, NASA will identify root causes of potential barriers and develop corrective actions.

Table 1. NASA Physical Science Occupations: FY 2021

Physical Science Job Series	Number of NASA Employees
1301 - Physical Scientist	465
1306 - Health Physicist	6
1310 - Physicist	111
1311 - Physical Science Technician	4
1313 - Geophysicist	14
1320 - Chemist	5
1330 - Space Scientist	330
1340 - Meteorologist	22
1360 - Oceanographer	15
1386 - Photographic Technologist	4
1399 - Physical Science Trainee	465

Source: NASA Personnel Data Warehouse; data as of 10/1/2020. NASA has identified job series 1301 and 1310 as mission critical occupations because of their importance to NASA missions and the large numbers of employees those series.

¹¹ According to EEOC, a trigger is a situation that alerts an agency to the possible existence of a barrier to EEO. For example, low participation (or representation) of a group in certain occupations, or among employees receiving promotions, awards, etc., may indicate that there is an agency policy or practice that limits the full participation of that group. A trigger does not by itself demonstrate a barrier to equal opportunity; it indicates an area to be monitored or further analyzed.

¹² In initial analyses, NASA examined data for Asian Americans and Native Hawaiians and Other Pacific Islanders (NHOPI) separately. Because of the small number of NHOPI in the workforce, however, this did not significantly impact the findings. Thus, the Agency combined these groups in subsequent analyses.

¹³ EEOC identifies the appropriate benchmarks for comparison. Agency representation in specific occupations should be compared to the RCLF, which measures individuals in the civilian labor force in occupations equivalent to occupations in the Federal Government. RCLF data are compiled by the U.S. Census Bureau for the EEOC. U.S. Census Bureau, "Equal Employment Opportunity Tabulation: FAQs," accessed at <https://www.census.gov/topics/employment/equal-employment-opportunity-tabulation/about/faq.html#par_textimage_514458183>.

Phase 1

Purpose of Phase and Data Examined: In Phase 1, NASA focused its attention on surface-level indicators of potential barriers to inclusion, comparing its workforce to the RCLF to determine which demographic groups have lower than expected participation rates in Physical Science positions.

Data Findings: When compared to the RCLF, the following groups have lower participation rates in the following NASA occupations (see Table 2):

- *Physical Scientists:* AAPI Women and White Women are underrepresented.
- *Space Scientists:* AAPI Women and White Men are underrepresented.
- *Physicists:* AAPI Men, Black Men, and White Men are underrepresented.

Further, while their numbers are also low in the RCLF, the following groups are absent from the NASA workforce: there are no Multiracial individuals or AIAN Women in NASA Physical Scientist positions; there are no Black Women, Hispanic Women, Multiracial individuals, or AIAN employed as NASA Space Scientists; and there are no AIAN in NASA Physicist positions. While triggers were identified for other groups, NASA will focus subsequent phases of the barrier analysis on AAPI and Women.

Table 2. NASA Physical Science Workforce Compared to the RCLF

		Physical Scientist		Space Scientist		Physicist	
		NASA	RCLF	NASA	RCLF	NASA	RCLF
AAPI	Men	8.7%	8.2%	8.1%	5.1%	3.6%	5.1%
	Women	3.8%	6.7%	0.9%	1.9%	3.6%	1.9%
	Total	12.5%	14.9%	9.0%	7.0%	7.2%	7.0%
Black	Men	1.5%	1.4%	7.2%	2.1%	0.9%	2.1%
	Women	1.5%	2.2%	0.0%	0.1%	0.6%	0.1%
	Total	3.0%	3.6%	7.2%	2.2%	1.5%	2.2%
Hispanic	Men	3.2%	2.4%	2.7%	3.4%	3.3%	3.4%
	Women	2.6%	1.9%	0.0%	0.6%	2.7%	0.6%
	Total	5.8%	4.3%	2.7%	4.0%	6.0%	4.0%
Multiracial	Men	0.0%	0.3%	0.0%	0.4%	0.0%	0.4%
	Women	0.0%	0.2%	0.0%	0.2%	0.0%	0.2%
	Total	0.0%	0.5%	0.0%	0.6%	0.0%	0.6%
AIAN	Men	0.2%	0.4%	0.0%	0.5%	0.0%	0.5%
	Women	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%
	Total	0.2%	0.6%	0.0%	0.5%	0.0%	0.5%
White	Men	53.9%	48.1%	65.8%	72.6%	61.5%	72.6%
	Women	24.5%	27.8%	15.3%	12.9%	23.6%	12.9%
	Total	78.4%	75.9%	81.1%	85.5%	85.1%	85.5%
All Men		67.6%	60.8%	83.8%	84.1%	69.4%	84.1%
All Women		32.4%	39.0%	16.2%	15.7%	30.6%	15.7%

Notes: The table does not include Individuals who did not identify their race/ethnicity or gender; thus, not all groups total to 100 percent. Triggers highlighted in yellow; groups absent from the workforce are highlighted in red. For the purposes of this analysis, a one percentage point difference between the NASA workforce and the RCLF was considered a trigger.

NASA also examined representation by grade within the physical sciences. AAPI, Hispanic, and Women employees are not participating equally in higher grades: AAPI employees are not participating in SES positions equal to their workforce percentage. Hispanic employees are not participating in GS-14 and GS-15 positions equal to their workforce percentage. Women are not participating in GS-15 positions equal to their workforce percentage.

Phase 2

Purpose of Phase: The goal of Phase 2 was to look at additional personnel data to begin identifying why participation discrepancies might exist. This phase focused on the initial groups of concern: Women and AAPI.

Data Examined:

1. Hires and Separations. NASA examined hire and loss rates to see if discrepancies between NASA workforce participation and the RCLF are due to the inability to hire Women and AAPI versus high loss rates among those groups.
2. Time-in-Grade/Position and Promotions. NASA examined differences in participation rates in senior grades, time-in-grade, and time-in-position, as well as participation over the last one, three, and five years.
3. Average Age. NASA examined average employee age, to ensure that the discrepancies were not accounted for by a high percentage of early-career employees.
4. Education. NASA reviewed data on educational attainment to determine whether there is a qualification or perceived qualification issue that may be slowing a group's advancement.
5. FEVS Data. The Agency reviewed sub-indices of FEVS Employee Engagement Index, New Inclusion Quotient (New IQ), and Global Satisfaction Index. These sub-indices can reveal differences by race, ethnicity, gender, and occupation that may indicate potential barriers to inclusion.

Data Findings: NASA identified the following triggers with regard to AAPI and Women:

- ***Asian Americans and Pacific Islanders in the Physical Sciences:***

1. NASA hires of AAPI employees have been above the Physical Science RCLF values, except for the 1301 series where they are just slightly below the RCLF. Losses have slightly exceeded the size of the workforce over the past five years (8.8 percent of losses and 8.5 percent of the workforce in 2016). This trend is most notable in the 1301 series. At ARC, losses are slightly higher than AAPI representation in the workforce (8.3 percent of losses compared to 7.8 percent in the workforce).
2. AAPI have more time-in-grade and time-in-position than other demographic groups. For example, excluding SES and GS-15 employees, AAPI employees have been in their positions an average of 3.7 years. This is higher than Black (1.9 years), Hispanic (2.9 years), and White (3.4 years) employees.
3. With an average age of 53.8, AAPI employees in physical science occupations are the oldest demographic group (compared to 52.7 for White employees, 52 for Black employees, and 48.1 for Hispanic employees).

4. In terms of educational level, 93.9 percent of AAPI employees in physical sciences have a graduate degree (compared to 93.6 percent of White employees, 91.1 percent of Hispanic employees, and 86.2 percent of Black employees).

- **Women in the Physical Sciences:**

1. For hires in the largest three physical science occupations, Women accounted for a higher percentage of hires than the occupation’s corresponding RCLF value. For instance, Women make up 39.0 percent of the physical scientist workforce, but they accounted for 45.8 percent of the physical scientist hires in the last five years. For losses, Women did not leave at a rate substantially higher than their percentage in the workforce. Women accounted for 24.0 percent of the physical science workforce at the beginning of 2016 and have only accounted for 25.1 percent of the losses since that time. Thus, the data reveal no triggers related to hires and losses.
2. Women appear to get promoted earlier and at higher rates than Men. For example, excluding SES and GS-15 employees, Women have been in their positions an average of 2.7 years while Men have been in their positions an average of 3.6 years.
3. Women are, on average, about four years younger than Men (Average Age: Men, 54.2; Women, 48.4), which could indicate that Women are earlier in their careers.
4. Fewer Women have earned graduate degrees (Men, 94.1 percent; Women, 91.2 percent) and PhDs (Men, 83 percent; Women, 78.5 percent) compared to Men in these positions.
5. Women score lower than Men in multiple areas within the New IQ.

In addition to the findings mentioned above, Physical Scientists in general scored lower on the Global Satisfaction Index and the New IQ. There was insufficient data to further examine the Physical Scientist scores by demographic groups (see Table 3).

Table 3. FEVS Index Scores for Selected Subgroups: 2019

Index	NASA Workforce	Physical Scientists	AAPI	Female
Employee Engagement	83.0%	81.2%	88.6%	82.1%
Global Satisfaction	81.5%	78.8%	81.3%	82.5%
New Inclusion Quotient (New IQ)	79.3%	76.3%	80.3%	74.2%

Notes: Triggers highlighted in yellow. Index scores represent the percent of positive responses.

Phase 3

Purpose of Phase and Data Examined: Phase 3 is an expansion on Phase 2, involving a further analysis of personnel data. To gain additional insight before generating a strategy for subsequent phases of the barrier analysis, NASA analyzed applicant flow data, loss data, retirement eligibility disparities, and training data.

Data Findings:

- **Asian Americans and Pacific Islanders in the Physical Sciences:** With regard to retirement eligibility, it was found that this may be a contributing factor with 32.9 percent of the AAPI workforce currently eligible for retirement. This group had the highest retirement rate with

White employees having the second highest at 31.9 percent and all other demographic groups showing less than one-quarter of their physical science workforce retirement eligible.

- ***Women in the Physical Sciences:*** An examination of training data yielded no insights on the low promotion rates among women in physical sciences.

Phase 4

Purpose: Phase 4 is designed to identify what is known about the workforce, and where there is a need for additional data. Thus, there are two goals of this phase: (1) systematically summarize the findings of Phases 1-4, and (2) ask additional questions to organization leaders and human resources to help identify what questions need to be asked in the subsequent phases of this barrier analysis.

Data Examined: First, NASA reexamined the data and summaries on Phases 1-3 to identify strategically where we still have remaining questions that our current data can't answer. Second, we used qualitative interviewing to address key questions currently unanswered in our current data.

Findings: The main goal of this phase is to make sense of the findings of phases 1-3. In addition to those findings (as outlined in previous sections), a few other areas of concern were discovered in the qualitative interviews with human resources and managerial personnel. First, position recruitment for these positions is not particularly structured. When targeted recruitment happens, it is by request by managers rather than being data driven or strategic. Second, hiring for these positions is not regulated very much from the top down. Managers at different centers are given some guidance from senior Agency-level managers. However, local managers around the NASA centers are mostly in control of their hiring processes. Third, given the high percentage of GS-14 and GS-15 employees in these occupations, individual development plans are not used very often, which could potentially be hindering promotional rates to GS-15 and SES positions.

Phase 5

Purpose: With phase 4 identifying all that is currently known with this segment of the workforce, the goal of phase 5 is to collect more data using a psychometric survey. This survey will look at underlying constructs that might explain lower participation or advancement rates.

Data Examined: All of the data for phase 5 comes from a psychometric survey. Staff distributed the survey to all NASA civil servant Physical Scientists. This survey addressed the following constructs as potential root cause indicators: perceived fairness in hiring/promotion/development, intention to turnover, affective organizational commitment, perceived leadership quality, trust in executive leadership, trust in diversity culture, and supervisory support.

Findings: For AAPI employees, Affective Commitment, Turnover, and Fairness in Selection were examined as potential causes for low participation. However, none of these constructs provided any insight into low participation rates. Fairness in developmental opportunities was also examined as a potential cause for low advancement rates. However, it did not yield any insight into the low advancement rates for AAPI employees.

For women, fairness in developmental opportunities was examined as a potential cause for low advancement rates. However, it did not yield any insight into the low advancement rates for women. To address the low perceived inclusion among women in physical science occupations, several common

correlates were examined as potential indicators for root causes. The results of the survey show that women in these positions have lower supervisory trust and have less trust that NASA is embracing diversity compared to men in these occupations.

Subsequent Phases and Approximate Timeline

Phase 6: Based on the survey results, NASA will conduct interviews and/or focus groups with members of the affected demographic groups. This research will serve two purposes: (1) to explore where, when, why, and how some of these identified triggers may be problematic; and (2) to identify potential steps that might help to remove or mitigate potential barriers to equal employment opportunity for the group. ***Expected Completion: November 1, 2022.***

Phase 7: The data collected from Phases 1 to 6 will be reviewed to determine whether barriers to equal employment opportunity exist for various demographic groups in the NASA workforce. The final report will not only include a list of challenges but will also identify actions to address each of the challenges. ***Expected Completion: November 15, 2022.***

APPENDIX C: DOCUMENTS REQUIRED BY EEOC

EEOC requires agencies to include several documents with their MD-715 report submissions. The required documents are available on the Web sites identified in the table below:

Mandatory Documents	Web site
Organizational Chart	https://www.nasa.gov/about/org_index.html
EEO Policy Statement	https://www.nasa.gov/offices/odeo/policy-and-publications
Strategic Plan	https://www.nasa.gov/news/budget/index.html
Anti-Harassment Policy and Procedures	https://www.nasa.gov/offices/odeo/policy-and-publications
Reasonable Accommodation Procedures	https://www.nasa.gov/offices/odeo/policy-and-publications
Personal Assistance Services Procedures	https://www.nasa.gov/offices/odeo/policy-and-publications
Alternative Dispute Resolution Procedures	https://www.nasa.gov/offices/odeo/policy-and-publications

Agencies have the option of submitting the documents listed in the following table. In addition, the appendices in this report are not required by EEOC but will be submitted with the MD-715 report as optional documents.

Optional Documents	Description and/or Web site
Federal Equal Opportunity Recruitment Program (FEORP) Report	NASA is participating in an OPM pilot to combine these reports. The report will be provided upon request.
Disabled Veterans Affirmative Action Program (DVAAP) Report	
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	Part J of this document serves as the plan for increasing the employment of individuals with disabilities.
Diversity and Inclusion Plan under Executive Order 13583	https://www.nasa.gov/offices/odeo/diversity-and-inclusion
Diversity Policy Statement	https://www.nasa.gov/offices/odeo/policy-and-publications
Human Capital Strategic Plan	This document will be provided upon request.
EEO Strategic Plan	This report constitutes NASA's EEO Strategic Plan.
Results from most recent FEVS or Annual Employee Survey	NASA uses the results of the FEVS in conducting its trigger and barrier analyses for the MD-715 plan. See Figures 1 and 2 in Appendix B for summary data.

APPENDIX D: LIST OF FREQUENTLY USED ACRONYMS

AA	Associate Administrator	JSC	Johnson Space Center
AAPI	Asian Americans and Pacific Islanders	KSC	Kennedy Space Center
ADR	Alternative Dispute Resolution	LaRC	Langley Research Center
AFRC	Armstrong Flight Research Center	LGBTQ+	Lesbian, Gay, Bisexual, Transgender, and Queer and/or Questioning
AHP	Anti-Harassment Program	MD-715	Management Directive 715
AIAN	American Indians and Alaska Natives	MSFC	Marshall Space Flight Center
ARC	Ames Research Center	NASA	National Aeronautics and Space Administration
AST	Aerospace Technology	NCLF	National Civilian Labor Force
CAP	Complaints and Programs Division	NPD	NASA Policy Directive
D&I	Diversity and Inclusion	NPR	NASA Procedural Requirement
DAD	Diversity and Data/Analytics Division	NSSC	NASA Shared Services Center
DEIA	Diversity, Inclusion, Equity, and Accessibility	ODEO	Office of Diversity and Equal Opportunity
EEO	Equal Employment Opportunity	OCHCO	Office of the Chief Human Capital Officer
EEOC	Equal Employment Opportunity Commission	OPM	Office of Personnel Management
ERG	Employee Resource Group	PA	Professional Administrative
FEVS	Federal Employee Viewpoint Survey	PAS	Personal Assistance Services
GRC	Glenn Research Center	RA	Reasonable Accommodation
GSFC	Goddard Space Flight Center	RCLF	Relevant Civilian Labor Force
HQ	NASA Headquarters	S&E	Science and Engineering
IWD	Individuals with Disabilities	SEP	Special Emphasis Program
IWTD	Individuals with Targeted Disabilities	SES	Senior Executive Service
		SSC	Stennis Space Center
		STEM	Science, Technology, Engineering, and Mathematics
		WFF	Wallops Flight Facility