

**NATIONAL AERONAUTICS AND SPACE
ADMINISTRATION (NASA)
MODEL EQUAL EMPLOYMENT OPPORTUNITY
PROGRAM STATUS REPORT: FY 2021**

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NATIONAL AERONAUTICS AND SPACE ADMINISTRATION (NASA)
MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM STATUS REPORT:
FY 2021

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PARTS A-D: AGENCY INFORMATION

MD-715 PART A - D	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT				
For period covering October 1, 2020 to September 30, 2021.					
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	17,387			
	Temporary Workforce	952			
	TOTAL EMPLOYMENT	18,339			
PART C1 Head of Agency and Head of Agency Designee	Leadership	Name	Title		
	Head of Agency	Bill Nelson	Administrator		
	Head of Agency Designee				
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	0260/SES	(202) 358- 2167	james.k.yamanaka@ nasa.gov
	Complaint Processing Program Manager	Vincent Patterson, Acting Director, Complaints Management Division	0260/GS-15	(202) 358- 0952	vincent.e.patterson @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	David Chambers, Equal Opportunity Compliance Manager	0360/GS-15	(202) 358-3158	david.r.chambers@nasa.gov
	ADR Program Manager	Randy Poynter, Equal Employment Manager	0260/GS-15	(202) 880-5205	randy.g.poynter@nasa.gov
	Compliance Manager	Dorenda King, Equal Opportunity Manager	0260/GS-15	(202) 358-0726	dorenda.r.king@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, 2020 to September 30, 2021.	
EXECUTIVE SUMMARY		
<p data-bbox="167 579 786 617"><i>Section I. Agency Mission and Leadership</i></p> <p data-bbox="167 663 1471 968">The mission of the National Aeronautics and Space Administration (NASA) is to “lead an innovative and sustainable program of exploration with commercial and international partners to enable human expansion across the solar system and bring new knowledge and opportunities back to Earth, support growth of the Nation’s economy in space and aeronautics, increase understanding of the universe and our place in it, work with industry to improve America’s aerospace technologies, and advance American leadership” (<i>NASA 2018 Strategic Plan</i>). The work of NASA benefits all Americans and all humanity. NASA inspires the world with exploration of new frontiers, discovery of new knowledge, and development of new technology.</p> <p data-bbox="167 1010 1471 1314">In 2021, for the ninth consecutive year, NASA was named the Best Place to Work in Government among large agencies by the Partnership for Public Service. 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 EEO program against the six Essential Elements of a Model Equal Employment Opportunity (EEO) Program, as outlined by the U.S. Equal Employment Opportunity Commission (EEOC) Management Directive 715 (MD-715). FY 2021 program accomplishments and DEIA successes are identified and discussed below.</p> <p data-bbox="167 1367 1094 1404"><i>Section II. The Six Essential Elements of a Model EEO Program</i></p> <p data-bbox="167 1451 1471 1640">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 five deficiencies within its program, reflecting a compliance rate of 97 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> <p data-bbox="215 1682 915 1719">1. Demonstrated Commitment of Agency Leadership</p> <p data-bbox="167 1761 1471 1908">In 2021, the Partnership for Public Service ranked NASA as the top large agency in the Federal Government for leadership support for diversity. Throughout FY 2021, Agency leadership continued to demonstrate their commitment to DEIA. Administrator Bill Nelson was sworn in on May 3, 2021. During the fiscal year, Administrator Nelson demonstrated his commitment to DEIA and EEO through</p>		

a variety of means. For instance, on September 28, 2021, the Administrator issued a Policy Statement on Diversity, Equity, Inclusion, and Accessibility for NASA's Workforce and Workplaces. The statement emphasized NASA's commitment to DEIA, which includes the following priorities: reinforcing a culture in which our employees feel they can be authentic, welcomed, respected, included, and engaged; maintaining an environment where our 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, as required by EEOC and Executive Orders issued by the Administration.

In September 2021, NASA held its first-ever Accessibility Conference in support of the Agency's Disability Employment and Reasonable Accommodation Program. Over 500 employees virtually participated, and the 3-day conference served as the kickoff event for NASA's FY 2021 National Disability Employment Awareness Month activities. Administrator Nelson opened the conference with a video message and introduction of the keynote speaker. The conference also featured a video message from the NASA Deputy Administrator and remarks from Associate Administrator. The conference included 31 speakers and 13 sessions, providing three days of valuable information and resources. All NASA employees and contractors were encouraged to attend. The conference was closed captioned and American Sign Language interpreters and 508 compliant presentation slides were provided.

In FY 2021, NASA also sought, through the President's funding request, the resources to advance America's Moon to Mars space exploration plan, keeping the Agency on the path to land the first woman and first person of color on the Moon under the Artemis program.

2. 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 fact, LinkedIn selected NASA as the 2021 top diversity champion among U.S. employers with between 10,000 and 30,000 employees. LinkedIn's Talent Awards are a data-driven recognition of companies worldwide that have demonstrated remarkable adaptability, innovation, and creativity in the talent space. LinkedIn also recognized NASA for having the top internship program, above companies including Google. This is a prominent and visible recognition of DEIA success at NASA, and a credit to the Agency-wide emphasis and culture of DEIA and employee engagement as well as the important work of ODEO and other mission support organizations that lead DEIA strategy and programs, such as the Office of the Chief Human Capital Officer (OCHCO).

Further, in FY 2021 NASA revised one of its Agency Honor Awards to further support NASA's Core Value of Inclusion. The award was renamed the Diversity, Equity, and Inclusion Medal and the criteria for the award was updated to reflect current definitions of Diversity, Inclusion, and Equity as described in recent DEIA Executive Orders and NASA policy statements.

3. Management and Program Accountability

NASA ODEO reports quarterly on EEO and DEIA performance outcomes at the quarterly Agency senior leadership Baseline Performance Review (BPR) meeting. 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.

In FY 2021, NASA added a new diversity and inclusion performance element to all GS-level supervisory performance plans. Further, per NASA Procedural Requirement (NPR) 3335.1, Merit Promotion and Placement Plan, supervisors are responsible for the following:

- Integrating Diversity & Inclusion (D&I) into strategic recruitment decision-making to enhance organizational effectiveness and help achieve mission goals.
- Participating in the development of recruitment strategies aimed at reaching qualified individuals who are underrepresented in the workplace as identified in the Agency's Federal Equal Opportunity Recruitment Program plans and barrier analyses.

Throughout FY 2021, NASA continued to refine its EEO and D&I 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 2021. This is due to the adoption of a new staffing solution, USA Staffing, and the lag time needed to develop the applicant flow data tables within the new environment.

4. Proactive Prevention of Unlawful Discrimination

In support of recent DEIA Executive Orders, NASA implemented the following:

- Developed an action plan to address the requirements of Executive Order (E.O.) 13988 on Gender Identity and Sexual Orientation. The plan includes: Guidance on Gender Transition and Identity, Policy for Restroom Inclusivity, a review of badging and security procedures to remove barriers to EEO and accessibility for Lesbian, Gay, Bisexual, Transgender, and Queer and/or Questioning (LGBTQ+) employees, and a review of NASA's Astronaut Selection and Retention Standards.
- Conducted a DEIA assessment and identified DEIA best practices in response to E.O. 14035 on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce.
- Provided input to inform the White House on the development of a Government-wide strategy for advancing gender equity and equality, as required by E.O. 14020 on Gender Policy.

Further, throughout FY 2021, 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 Employee Resource Groups (ERGs), which play a vital role in NASA's retention and development efforts. As noted above, NASA held its first-ever Accessibility Conference to educate NASA managers, supervisors, and employees on the provision of reasonable accommodations to individuals with disabilities. In addition, NASA also 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 2021, NASA received 46 reports of harassment under the AHP, achieving an average processing time of 64 days (compared to 65 days in FY 2021). NASA continues to train the workforce with its award-winning, on-line "gamified" anti-harassment training.

5. Efficiency

NASA completed development of a new Reasonable Accommodation Management System (RAMS). The new RAMS tool will enable the Agency to better track and monitor trends in processing of reasonable accommodation requests. Moreover, to improve effectiveness and efficiency in the NASA Affirmative Employment Program, the Agency procured workforce barrier analysis training through the EEOC for approximately 50 ODEO staff members and provided several training sessions on data analytics.

6. Responsiveness and Legal Compliance

NASA posted timely No FEAR Act data, met established deadlines for submitting the FY 2020 MD-715 report, and submitted a timely Annual Statistical Report of Discrimination Complaints (EEOC Form 462) to EEOC. In addition, in FY 2021 NASA:

- Achieved 100 percent timeliness in issuance of Final Agency Decisions (FADs). NASA improved the percentage of timely FADs from 76 percent in FY 2020 to 100 percent in FY 2021.
- Provided training to a cadre of settlement officials to increase their knowledge and develop their skills in settling disputes within the Agency. NASA anticipates this will increase the positive outcomes in Alternative Dispute Resolution (ADR) by having management officials who are knowledgeable about the ADR process, and who are able to identify unique solutions tailored to settle the conflict.

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.¹ The FY 2021 workforce composition data revealed the following triggers (see Appendix A, Table 1):

- 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. Each group makes up 8.7 percent of the workforce, yet each account for only 4.9 percent of the SES.
- Senior Level (SL) and Senior Scientific and Professional (ST) employees: Blacks, Hispanics, and Women make up a smaller proportion of both ST and SL positions than their overall representation in the workforce. Blacks make up 10.9 percent of the NASA workforce, yet are only 2.3 percent of those in ST positions and 1.1 percent of those in SL positions. Hispanics account for 8.7 percent of the NASA workforce, but only occupy 3.5 percent and 6.3 percent of ST and SL positions, respectively. Women are 34.9 percent of the NASA workforce, yet are only 19.8 percent and 17.9 percent of ST and SL employees, respectively. In addition, AAPI employees, who make up 8.7 percent of the NASA workforce, are underrepresented among SL employees, accounting for 4.2 percent of such positions (however, they are 12.8 percent of ST employees).
- 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 employees account for just 5.6 percent of those in supervisory positions (compared to their overall representation of 8.7 percent).

Triggers also exist with regard to specific occupations when compared to the Relevant Civilian Labor Force (RCLF) (see Appendix A, Tables 2-3).² For example, Women account for 31.2 percent of NASA Physical Scientists (job series 1301), yet are 43.4 percent of Physical Scientists in the RCLF. Similarly, AAPI make up 13.2 percent of Physical Scientists at NASA, but account for 16.4 percent of such positions in the RCLF. In addition, AAPI account for 7.1 percent of General Engineers (job series 0801) compared to 12.1 percent in the RCLF. Further, Blacks or African Americans account for just 1.5 percent of NASA Space Scientists (job series 1330), although they are 3.6 percent of Space Scientists in the RCLF. As noted in Part I of this report, NASA initiated a barrier analysis for Physical Science positions, the preliminary findings of which appear in Appendix B.

¹ 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.

² 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>.

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 3). For example:

- AAPI employees are 12.5 percent of NASA Accountants, compared to 8.6 percent of Accountants in the RCLF. AAPI also account for 6.7 percent of Human Resources Specialists at NASA and 4.3 percent of similar positions in the RCLF.
- Black employees are employed at rates more than three times their representation in the RCLF in Contract Specialist and Accountant positions. Blacks account for 27.1 percent of NASA Contract Specialists and 30.6 percent of NASA Accountants, but only 8.5 percent and 8.1 percent, respectively, in the RCLF.
- Hispanic employees are 11.1 percent of Management and Program Analysts, compared to 4.6 percent in the RCLF; 10.6 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 individuals with disabilities (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 22.5 percent and five percent of the NASA employees in those grades, respectively. For grades GS-11 and above, IWD and IWTD are 13.1 percent and 2.6 percent of NASA employees in those grades. The Agency will continue to monitor overall employment data on IWD and IWTD, with regard to recruitment, hiring, promotions, awards, and retention.

NASA continues to improve its data analytics capability and obtain data needed to monitor workforce demographics and conduct barrier analyses. In FY 2021, NASA implemented a new staffing solution and continues to develop new applicant flow data reports to meet EEOC's specifications. Thus, although this data was included in past MD-715 reports, NASA was unable to analyze applicant flow data for FY 2021.

Section IV. FY 2021 Model EEO Program Accomplishments

In FY 2021, NASA corrected three of the eight program deficiencies identified in the previous fiscal year:

1. *Revise exit surveys to include questions on how the Agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.* NASA redesigned its exit survey to be more user-friendly and added and/or revised questions to obtain information on former employees' experiences, with regard to DEIA. The new survey was deployed in on October 4, 2021 (see Part H-3).

2. *Establish timeframes to issue acceptance letters/dismissal decisions within a reasonable time after receipt of the written EEO Counselor report.* NASA established a timeframe of 45 days for issuing acceptance/dismissal decisions and is monitoring its timeliness (see Part H-5).
3. *Complete FADs within established timeframes.* NASA issued 100 percent of FADs timely in FY 2021, compared to 76 percent in FY 2020 (see Part H-8).

Section V. FY 2022 Planned Activities

No new program deficiencies were identified in FY 2021; work continues on five deficiencies identified in FY 2020:

1. *Revise Agency structure so that the AA, ODEO, reports directly to the NASA Administrator, pursuant to 29 CFR §1614.102(b)(4).* The NASA Administrator was sworn in on May 3, 2021. The AA, ODEO, now reports directly to the Deputy Administrator. NASA will determine how to address this deficiency, which NASA identified in Part G of the FY 2019 MD-715 report, and EEOC highlighted in an April 2020 Agency audit report (see Part H-1).
2. *Establish timeframes for completing inquiries of harassment allegations under the Anti-Harassment Program.* In January 2021, NASA published new Anti-Harassment Procedures (NASA Procedure Requirement (NPR) 3713.3A) that include EEOC-specified timeframes for initiating action on and completing the processing of reports of harassment. To ensure timelines are met, NASA is developing a tracking system and will continue to provide training and technical assistance to Center Anti-Harassment Coordinators (see Part H-2).
3. *Ensure EEO counseling is completed timely within 30 or 90 calendar days, pursuant to 29 CFR §1614.108.* FY 2021, NASA completed 89 percent of its counseling timely (compared to 93 percent in FY 2020). NASA has instituted “Coffee Chats” and bi-monthly meetings with counselors and provided EEO counselor refresher training provided March and April (see Part H-4).
4. *Ensure EEO investigations are completed timely, pursuant to 29 CFR §1614.108.* The timeliness of investigations increased from 86 percent in FY 2020 to 95 percent in FY 2021 (see Part H-6).
5. *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).* NASA plans to issue 180-day letters, when appropriate, within 185 calendar days of when a formal complaint is filed (see Part H-7).

In addition, NASA continues to strengthen its data analytics capabilities and conduct barrier analyses regarding Women, AAPI, and IWD. NASA will complete additional phases of its barrier analysis regarding the employment of Women and AAPIs as Physical Scientists at NASA, including conducting interviews with subject matter experts, and will continue to address issues related to its disability program (see Parts I and 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,	Stephen T. Shih, 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>		
		6/14/2022
Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD 715.		Date
		5/31/2022
Signature of Agency Head or Agency Head Designee		Date

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PART G: AGENCY SELF-ASSESSMENT CHECKLIST – FY 2021

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 policy on September 28, 2021.
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 8/11/2021 and presented data at the Agency Baseline Performance Review on a quarterly basis.
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	Objective 4.4, Manage Human Capital, references proactive efforts to ensure EEO and prevent workplace discrimination.
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-	Yes	

	715, II(E)]. <i>If not, identify the systems with insufficient funding in the comments section.</i>		
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. Dep't of Defense (Defense Commissary Agency)</i> , EEOC Appeal No. 0120130331 (5/29/15)] <i>If no, provide the percentage of timely-processed inquiries in the comments section.</i>	No	NASA uses an indicator of 60 days for case completion. In FY 2021, NASA completed 56.7 percent of cases in a timely fashion. See Part H-2.

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 supervise in a workplace with diverse employees? [MD-715 Instructions, Sec. I]	Yes	
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 §	Yes	

	1614.102(a)(6); see also <i>Douglas v. Veterans Administration</i> , 5 MSPR 280 (1981)]		
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	No individuals were disciplined or sanctioned in FY 2021.
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	Completed in FY 2021. See Part H-3.
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	Yes	Complaints, climate surveys (e.g., FEVS), anti-harassment

	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>		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 completed 89 percent of counseling timely in FY 2021. See Part H-4.
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 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>	Yes	Timeframes achieved in FY 2021; the average processing time was 57 days. See Part H-5.
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	Achieved in FY 2021. See Part H-6.
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)]	No	NASA does not issue 180-day letters. See Part H-7.
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	Achieved in FY 2021. See Part H-8.
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 effectiveness of its EEO program? [MD-715, II(E)] <i>If yes, provide example in the comments section.</i>	Yes	NASA reviews other agencies’ MD-715 reports, benchmarks with other agencies, reviews best practice, 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	

PART H: ESSENTIAL ELEMENT DEFICIENCIES AND PLANNED ACTIVITIES

The following planned actions and accomplishments address program deficiencies identified in Part G in FY 2020. NASA completed Parts H-3, H-5, H-6, and H-8 in FY 2021. NASA plans to complete Parts H-1, H-2, H-4, H-5, and H-7 in FY 2022.

MD-715 PART H-1	<i>U.S. Equal Employment Opportunity Commission</i> 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				
<p><u>FY 2021 Progress and Accomplishments:</u> The Administrator was sworn-in on May 3, 2021. ODEO continues to discuss reorganization. The AA, ODEO, was realigned and elevated from reporting to the Deputy Associate Administrator to the Deputy Administrator.</p> <p><u>Modifications to Objective:</u> Modified completion date to 9/30/2023.</p>				

MD-715 PART H-2	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
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, 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	9/30/2022	
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		
9/30/2022	6. Provide training and technical assistance to Center Anti-Harassment Coordinators on conducting immediate interviews.	Yes		
<p>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE</p> <p><u>FY 2021 Progress and Accomplishments:</u> NASA revised its Anti-Harassment procedures (NPR 3713.3), which now include a requirement for inquiries to begin within ten days of receipt of an allegation and specifies a 60-day timeframe for Issuing final decision memoranda. NASA published the new procedures on January 12, 2021.</p> <p><u>Modifications to Objective:</u> Added planned activities #5-6; modified completion date to 9/30/2022.</p>				

MD-715 PART H-3	<i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
DESCRIPTION AND TYPE OF PROGRAM DEFICIENCY:	NASA exit surveys do not include adequate questions on how the Agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities. (Part G, Proactive Prevention, Measure D.1.c)			
OBJECTIVE:	Include specific questions regarding employees with disabilities in exit surveys.			
RESPONSIBLE OFFICIAL:	AA, ODEO, and Assistant Administrator, OCHCO			
DO THE RESPONSIBLE OFFICIAL'S PERFORMANCE STANDARDS ADDRESS THIS PLAN? (Yes or No) Yes				
DATES:	Date Initiated	Target Completion Date	Modified Date	Date Completed
	8/31/2018	9/30/2021		10/4/2021
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:				
Target Date	Planned Activities		Sufficient Funding & Staffing?	Modified Date
8/31/2018	1. Establish ODEO working group to develop exit survey questions related to IWD.		Yes	9/30/2018
9/30/2020	2. Draft exit survey questions.		Yes	9/30/2020
9/30/2020	3. Meet with OCHCO regarding revisions to exit surveys.		Yes	10/7/2020
9/30/2021	4. Launch revised exit survey format with additional questions related to DEIA and IWD.		Yes	10/4/2021
<p>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE</p> <p><u>FY 2021 Progress and Accomplishments:</u> In FY 2021, NASA redesigned its exit survey to be more user-friendly and added and/or revised questions to obtain information on former employees' experiences with regard to DEIA. The new survey was deployed for Agency-wide collection efforts on October 4, 2021.</p> <p><u>Modifications to Objective:</u> <i>This objective is now complete.</i></p>				

MD-715 PART H-4		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 counseling is 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	9/30/2022		
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 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	9/30/2022	
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 2021 Progress and Accomplishments:</u> FY 2021, NASA completed 89 percent of its counseling timely (compared to 93 percent in FY 2020). NASA has instituted "Coffee Chats" and bi-monthly meetings with counselors and provided EEO counselor refresher training provided on March 31 and April 7, 2021.</p> <p><u>Modifications to Objective:</u> Modified completion date to 9/30/2022. 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>					

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 issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report. (Part G, Efficiency, Measure E.1.d)			
OBJECTIVE:	Establish internal metrics to ensure acceptance letters/dismissal decisions are issued within reasonable timeframes.			
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
	4/1/2021	9/30/2021		9/30/2021
PLANNED ACTIONS TOWARD COMPLETION OF OBJECTIVE:				
Target Date	Planned Activities	Sufficient Funding & Staffing?	Modified Date	Completion Date
5/1/2021	1. Establish timeframes for issuing acceptance letters/dismissal decisions.	Yes		5/1/2021
5/1/2021	2. Provide guidance to staff regarding new timeframes.	Yes		5/1/2021
9/30/2021	3. Monitor progress on issuing acceptance letters/dismissal decisions within established timeframes.	Yes		9/30/2021
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE				
<p><u>FY 2021 Progress and Accomplishments:</u> NASA established a timeframe of 45 days for issuing acceptance letters/dismissal decisions and provided guidance to staff regarding the timeframe. NASA will continue to monitor its progress on issuing acceptance letters/dismissal decisions within the timeframe.</p> <p><u>Modifications to Objective:</u> <i>This objective is now complete.</i></p>				

MD-715 PART H-6		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
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 completed timely 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		
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	9/30/22	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE					
<p>FY 2021 Progress and Accomplishments: The timeliness of investigations increased from 86 percent in FY 2020 to 95 percent in FY 2021 (19 of 20 cases were timely). NASA will closely monitor its investigations to ensure compliance with regulations.</p> <p>Modifications to Objective: <i>Modified completion date to 9/30/2022.</i></p>					

MD-715 PART H-7		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		
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 185 calendar days of when the formal complaint was filed.		Yes	9/30/22	
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE					
<u>FY 2021 Progress and Accomplishments:</u> NASA developed standard operating procedures for its complaints processing program.					
<u>Modifications to Objective:</u> Modified completion date to 9/30/2022.					

MD-715 PART H-8		U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT			
DESCRIPTION AND TYPE OF PROGRAM DEFICIENCY:	NASA does not complete FADs within the timeframes established by 29 CFR. Part 1614, section 110, and EEOC regulations. (Part G, Efficiency, Measure E.1.h)				
OBJECTIVE:	Ensure all FADs are timely completed in accordance with regulatory requirements.				
RESPONSIBLE OFFICIAL:	AA, 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	9/30/2021	9/30/2021	
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. 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	3. Engage personnel who are experienced, skilled, and knowledgeable in Federal EEO complaints processing from informal processing to FADs.		Yes		9/30/2019
9/30/2019	4. Hold responsible staff, including contractors, responsible for timely and quality processing of complaints.		Yes		9/30/2019
9/30/2019	5. Review monthly complaint processing data by Center (for informal complaints) and Agency-wide (formal processing) to track compliance to regulatory requirements and address timeliness and quality issues as expeditiously as possible, as needed.		Yes		9/30/2019
9/30/2020	6. Eliminate backlog.		Yes		9/30/2020
9/30/2021	7. Prioritize timeliness and dedicate resources to completing all FADs within required timeframes.		Yes		9/30/2021
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE					
<p><u>FY 2021 Progress and Accomplishments:</u> In FY 2021, NASA issued timely FADs in 100 percent of EEO complaints, compared to 76 percent in FY 2020 and 21 percent in FY 2019.</p> <p><u>Modifications to Objective:</u> <i>This objective is now complete.</i></p>					

PART I: BARRIER ANALYSIS AND PLANNED ACTIVITIES

MD-715 PART I	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 comparison of FY 2020-21 NASA workforce data to the RCLF reveals 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: <table border="1" data-bbox="391 1031 1539 1373"> <tbody> <tr> <td data-bbox="391 1031 834 1073">All Men</td> <td data-bbox="834 1031 1490 1073">Asian Males</td> <td data-bbox="1490 1031 1539 1073">X</td> </tr> <tr> <td data-bbox="391 1073 834 1115">All Women</td> <td data-bbox="834 1073 1490 1115">Asian Females</td> <td data-bbox="1490 1073 1539 1115">X</td> </tr> <tr> <td data-bbox="391 1115 834 1157">Hispanic or Latino Males</td> <td data-bbox="834 1115 1490 1157">Native Hawaiian or Other Pacific Islander Males</td> <td data-bbox="1490 1115 1539 1157">X</td> </tr> <tr> <td data-bbox="391 1157 834 1220">Hispanic or Latino Females</td> <td data-bbox="834 1157 1490 1220">Native Hawaiian or Other Pacific Islander Females</td> <td data-bbox="1490 1157 1539 1220">X</td> </tr> <tr> <td data-bbox="391 1220 834 1262">White Males</td> <td data-bbox="834 1220 1490 1262">American Indian or Alaska Native Males</td> <td data-bbox="1490 1220 1539 1262"></td> </tr> <tr> <td data-bbox="391 1262 834 1304">White Females</td> <td data-bbox="834 1262 1490 1304">X American Indian or Alaska Native Females</td> <td data-bbox="1490 1262 1539 1304"></td> </tr> <tr> <td data-bbox="391 1304 834 1346">Black or African American Males</td> <td data-bbox="834 1304 1490 1346">Two or More Races Males</td> <td data-bbox="1490 1304 1539 1346"></td> </tr> <tr> <td data-bbox="391 1346 834 1373">Black or African American Females</td> <td data-bbox="834 1346 1490 1373">Two or More Races Females</td> <td data-bbox="1490 1346 1539 1373"></td> </tr> </tbody> </table>			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				
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BARRIER ANALYSIS PROCESS																														
SOURCES OF DATA:	<table border="1" data-bbox="391 1415 1539 1917"> <thead> <tr> <th data-bbox="391 1415 878 1482">Sources</th> <th data-bbox="878 1415 1130 1482">Source Reviewed (Y/N)?</th> <th data-bbox="1130 1415 1539 1482">Identify Information Collected</th> </tr> </thead> <tbody> <tr> <td data-bbox="391 1482 878 1530">Workforce Data Tables</td> <td data-bbox="878 1482 1130 1530">Yes</td> <td data-bbox="1130 1482 1539 1530">Table A6</td> </tr> <tr> <td data-bbox="391 1530 878 1579">Complaint Data (Trends)</td> <td data-bbox="878 1530 1130 1579">Yes</td> <td data-bbox="1130 1530 1539 1579"></td> </tr> <tr> <td data-bbox="391 1579 878 1627">Grievance Data (Trends)</td> <td data-bbox="878 1579 1130 1627">Yes</td> <td data-bbox="1130 1579 1539 1627"></td> </tr> <tr> <td data-bbox="391 1627 878 1730">Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)</td> <td data-bbox="878 1627 1130 1730">N/A</td> <td data-bbox="1130 1627 1539 1730"></td> </tr> <tr> <td data-bbox="391 1730 878 1778">Climate Survey (e.g., FEVS)</td> <td data-bbox="878 1730 1130 1778">Yes</td> <td data-bbox="1130 1730 1539 1778">FEVS Indexes</td> </tr> <tr> <td data-bbox="391 1778 878 1827">Exit Interview Data</td> <td data-bbox="878 1778 1130 1827">No</td> <td data-bbox="1130 1778 1539 1827"></td> </tr> <tr> <td data-bbox="391 1827 878 1875">Focus Groups</td> <td data-bbox="878 1827 1130 1875">No</td> <td data-bbox="1130 1827 1539 1875"></td> </tr> <tr> <td data-bbox="391 1875 878 1917">Interviews</td> <td data-bbox="878 1875 1130 1917">Yes</td> <td data-bbox="1130 1875 1539 1917"></td> </tr> </tbody> </table>	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			
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	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	9/30/2020	Yes		9/30/2020
	Complete barrier analysis.	10/1/2020	9/30/2022	Yes		
	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	No		
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 OCHCO and the Science Mission Directorate (SMD), to					9/28/2018

	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)		
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)		
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.		

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	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.		
9/30/2026	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.		
9/30/2026	17. Assess current data governance and related policies to ensure effective data management, stewardship, and security.		
9/30/2026	18. Assess current data governance and related policies to ensure effective data management, stewardship, and security.		

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

FY 2021 Progress: NASA reviewed additional workforce data, including training data, and interviewed key officials in OCHCO, SMD, and the Office of the Chief Scientist to obtain additional information regarding Physical Science positions at NASA.

Modifications to Objective: None.

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

MD-715 PART J	U.S. Equal Employment Opportunity Commission 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 2021, IWD account for 23 percent of employees GS-1 to GS-10 and 13 percent of employees GS-11 to SES. NASA's participation rate for IWD has increased over the past three years.

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 2021, IWTD account for 5 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.

EEO personnel continue 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 June 2021, 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 101 self-identified employees with disabilities. Additionally, NASA held a three day Accessibility Conference for all employees, where among many disability-related topics, numerical goals and hiring strategies were discussed.

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 & 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.

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
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 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 2021, the Agency-level Disability Employment Program (DEP) sponsored a three day Accessibility Conference, with training for all NASA employees, including supervisors and managers and Center DPMs. Sessions included: Ensuring Inclusion for Employees with Disabilities in the Workplace, the Department of Labor's Workforce Recruitment Program, Disabled Veteran Hiring Authorities and Retention, Hiring for Neurodiversity, Schedule A Hiring, ERGs Best Practices, Disability Etiquette, how to be an Ally to Individuals with Disabilities, Reasonable Accommodation, and Section 508 Compliance. As a follow-on to the Conference, the DEP sponsored a 3.5-hour RA training for Agency-wide use for employees and another such training for supervisors, 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.

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 leveraging disability ERGs and SEPs to encourage participation in job opportunities within the IWD population.

ODEO and the Office of STEM Engagement (OSTEM) have coordinated to highlight interns with disabilities for National Disability Employment Awareness Month and other avenues to support interns with disabilities. The NASA Accessibility Conference included a session by the Project Director of the Entry Point! Program at American Association for the Advancement of Science to discuss increasing numbers of interns with disabilities; follow-on discussions were held between Entry Point! and NASA's OSTEM Internship Program. Additionally, the DEP developed a public-facing NASA Disability Resources webpage, which contains information for NASA applicants with disabilities, including information on the Schedule A hiring process, 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 for the job interview process.

NASA Centers regularly worked with local colleges and universities to conduct outreach in FY 2021. For example, Goddard Space Flight Center (GSFC) completed a pilot consisting of high school and college students meeting with leadership to encourage students with disabilities to apply for internships/employment with the Agency; the Johnson Space Center (JSC) DPM and representatives of Texas Instruments, Texas A&M University, and NASA Human Resources (HR) participated in an Employer Career Webinar Panel for students with disabilities; and the Kennedy Space Center (KSC) ERGs hosted a Disability Mentoring Day virtual event with KSC subject matter experts; the event had 527 registrations, representing 100 schools/universities/non-profits.

Additional examples of how the NASA enterprise identified job applicants with disabilities for FY 2021 include: Glenn Research Center's (GRC) use of the OPM Shared List of People with Disabilities and the Ohio Means Jobs database to search for resumes of qualified applicants with disabilities; Ames Research Center (ARC) posting Pathways internship positions online on the American Association for the Advancement of Science (AAAS) website; Headquarters (HQ) staff attending employment fairs and outreach activities for veterans and disabled veterans; and JSC's participation in a job fair hosted by the Texas Veterans Leadership Program and Harris County, Texas.

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). The DEP held sessions at the NASA Accessibility Conference on Schedule A, the U.S. Department of Labor (DOL) Workforce Recruitment Program (WRP), and Disabled Veteran Hiring Authorities. The DEP also facilitated a meeting between the Department of Veterans Affairs’ (VA) National Employment Coordinator and OCHCO to encourage an increase in the use of veterans hiring authorities.

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 asks 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 provided training this year through the three day Accessibility Conference in September 2021, to all NASA employees, including managers and supervisors and Center DPMs, on Schedule A veterans' preference in hiring, and the WRP.

NASA Centers provide regular training sessions for hiring officials, particularly for new managers and supervisors. This year, ODEO worked with OCHCO to create a new “HR101” training for new supervisors and managers, which included 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. While some Centers have conducted virtual training for hiring officials this year, others are planning to resume training next year, due to the pandemic.

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 2021, 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 VA. 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 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 via social media, as well.

NASA Centers also maintain contacts with organizations that assist IWD and IWTD in securing and maintaining employment. For example, at GSFC, the DPM and the Center's Equal Accessibility Advisory Committee has established a partnership with OSTEM to create a database that captures contacts from colleges and universities to forward job announcements to IWD and IWTD.

At the Agency level, the DEP partnered with the OPM, DOL, the VA, the MITRE Corporation, Sliding Doors STEM and Dyslexia Learning Center, and the Entry Point! Program at American Association for the Advancement of Science on numerous topics surrounding the hiring and retention of individuals with disabilities.

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 No
- b. New Hires for Permanent Workforce (IWTD) Yes No

In FY 2021, ten 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
- b. New Hires for MCO (IWTD) Yes No N/A

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
- b. Qualified Applicants for MCO (IWTD) Yes No N/A

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, Women, and members of race and ethnicity 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.

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. In FY 2020, NASA implemented the Talent Marketplace automated platform that ensures developmental opportunities are widely announced to all NASA employees. Talent Marketplace provides information on the availability of opportunities such as job announcements, details, and rotational assignments. Data on applicants are collected for subsequent analyses of the applicant and selection process.

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 (%)		IWTD (%)	
	Applicants	Selectees	Applicants	Selectees	Applicants	Selectees
Internship Programs	44,236	2,344	7.3%	6.8%		
Detail Programs	3,132	175	9.6%	7.4%	3.4%	1.7%
Fellowship Programs	Data not available or programs not conducted in FY 2021.					
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 IWTD 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 No N/A
- b. Selections (IWD) Yes No N/A

There are no triggers for the internship program. For details, the IWD account for 13.1 percent of the relevant applicant pool but are only 9.6 percent of applicants. Further, IWD are only 7.4 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
- b. Selections (IWTD) Yes No

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 No
- b. Awards, Bonuses, & Incentives (IWTD) Yes No

In FY 2021, the inclusion rates were 11.5 percent for IWD and 2.5 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 \$3,000 or more. In addition, for cash awards of \$4,000 or more, IWD/IWTD accounted for fewer than two percent of awards. 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 No **X**

There were no significant triggers regarding 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%	2.1%
Type of Award:			
Time Off Awards	1-10 hours	13.1%	2.8%
	11-20 hours	12.4%	2.6%
	21-30 hours	11.4%	1.7%
	31-40 hours	14.6%	2.8%
	41 or more hours	15.0%	1.5%
Cash Awards	\$500 and Under	14.7%	3.3%
	\$501 - 999	13.4%	2.6%
	\$1000 - \$1999	12.2%	2.6%
	\$2000 - \$2999	11.1%	2.1%
	\$3000 - \$3999	9.5%	1.8%
	\$4000 - \$4999	8.4%	1.3%
	\$5000 or More	8.1%	1.1%
Other Awards	Performance Award	10.0%	1.5%
	Quality Step Increase	10.2%	1.4%

Source: NASA MD-715 Table B-9, prepared by Department of the Interior (DOI); data as of 9/30/2021. 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 | X | No | |
| 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 | <input checked="" type="checkbox"/> |
| b. New Hires to GS-15 (IWTD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| c. New Hires to GS-14 (IWTD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| d. New Hires to GS-13 (IWTD) | Yes | No | N/A | <input checked="" type="checkbox"/> |

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 | <input checked="" type="checkbox"/> |
| ii. Internal Selections (IWD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| b. Managers | | | | |
| i. Qualified Internal Applicants (IWD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| ii. Internal Selections (IWD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| c. Supervisors | | | | |
| i. Qualified Internal Applicants (IWD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| ii. Internal Selections (IWD) | Yes | No | N/A | <input checked="" type="checkbox"/> |

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 IWTD 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 (IWTD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| ii. Internal Selections (IWTD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| b. Managers | | | | |
| i. Qualified Internal Applicants (IWTD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| ii. Internal Selections (IWTD) | Yes | No | N/A | <input checked="" type="checkbox"/> |
| 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 (IWTB) | Yes | No | N/A | X |
| b. | New Hires for Managers (IWTB) | Yes | No | N/A | X |
| c. | New Hires for Supervisors (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.

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

1. 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 61 Schedule A hires with disabilities eligible for conversion (hired in FY 2019), seven were not converted. (Of the seven not converted, two were reassigned to different organizations.)

2. 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
- b. Involuntary Separations (IWD) Yes No

IWD accounted for 19.0 percent of involuntary separations (4 of 21), which is higher than the inclusion rate for IWD of 11.6 percent. NASA will continue to monitor the IWD inclusion rate for separations. (See Table J2.)

3. 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
- b. Involuntary Separations (IWTD) Yes No

IWTD accounted for a lower percentage of both voluntary and involuntary separations, compared to their overall inclusion rate. (See Table J2.)

Table J2. Separations by Disability Status

Separation Type		Total	IWD	IWTD
Inclusion Rate	%	100.0%	11.6%	2.1%
Removal (Involuntary)	#	21	4	0
	%	100.0%	19.0%	0.0%
Resignation (Voluntary)	#	186	13	1
	%	100.0%	7.0%	0.5%
Total Separations	#	890	101	24
	%	100.0%	11.3%	2.7%

Source: NASA MD-715 Table B-1 (Losses), prepared by DOI; data as of 9/30/2021. Triggers highlighted in yellow.

4. 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.

Of the four involuntary separations of IWD, two were removed, one was terminated, and one was terminated during the probationary period.

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.

1. 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

2. 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

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of 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 2021, the DEP hosted OCIO's 508 Coordinators for a session to the workforce on 508 Compliance, at the Accessibility Conference in September, with a follow-on training on how to ensure documents are 508 Compliant in October 2021.

NASA developed 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. At NASA's Accessibility Conference, options for conference access were provided by both an American Sign Language interpreter and closed captioning, a practice NASA plans to use more often in the future.

The NASA 508 Program Managers Coordination group is developing a 508 accessibility scanning tool, to be deployed Agency-wide. This tool will be a standardized process to scan NASA websites to identify and correct compliance issues. NASA made certain aspects of the tool available in FY 2021, with full utilization across NASA by FY 2022. The 508 Program Managers Coordination group also is making changes in NASAs purchasing card system to ensure it is compliance with Section 508. NASA established an IT procurement office to manage 508 compliance throughout the acquisition life cycle. The group also developed a new website to enhance their NASA-wide communication with end-users and others in the community of practice. Currently, OCIO is developing a Self-Service Project to assist end-users with their accessibility technology needs.

At the Center-level, DPMs manage all RA requests, including technology accessibility issues. For example, GSFC has an Assistive Technology Demonstration Lab available to employees.

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.)

NASA RA processing averages 36 days or less at each Center. (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	15
Armstrong Flight Research Center	7.5
Glenn Research Center	18
Goddard Space Flight Center	30
Headquarters	13
Johnson Space Center	5
Kennedy Space Center	36
Langley Research Center	1
Marshall Space Flight Center	8
NASA Shared Services Center	9
Stennis Space Center	3

Source: NASA RAMS, data for FY 2021.

- 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.

In FY 2021, NASA trained more than 1,700 employees on their roles and responsibilities regarding RA. NASA routinely provides RA awareness briefings to new employees, new supervisors, and interns. In addition, all ten NASA Centers have designated DPMs to process RA requests and to provide technical assistance to employees, interns, managers, and supervisors. In addition, NASA developed a new Reasonable Accommodation Management System (RAMS), by which the Agency expects to increase timeliness and efficiency in processing requests. The new RAMS tool also allows Agency leadership to better monitor timeliness trends in RA processing.

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 Blanket Purchase Agreement (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 act as the Contracting Officer’s Representative to the PAS BPA to monitor contractor timeliness and quality. NASA provided a PAS guide to PAS technical monitors in FY 2021. To date, NASA has not had a need to use the PAS BPA.

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 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 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 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 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
2. Has the agency established a plan to correct the barrier(s) involving IWD and/or IWTD?
Yes No N/A
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 \$3,000 or more (see Part J, section IV, C). • <u>Separations</u>: There are triggers for involuntary separations of IWD (see Part J, section V, A). • <u>Schedule A conversions</u>: Not all FY 2019 Schedule A hires were converted to permanent positions with two years (see Part J, section V, A). <p>Due to the implementation of a new staffing solution, applicant flow data were not available for FY 2021. NASA will continue to monitor triggers and initiate appropriate action and activities if trends develop.</p>			
Source of Trigger	Workforce data tables.			
EEO Group(s) Affected	Individuals with Disabilities and Individuals with Targeted Disabilities.			
EEO 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	<p>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.</p>			
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. EEO matters in general are addressed.	
Target Date	Planned Activities	Sufficient Staffing & Funding	Modified Date	Completion Date
9/28/2018	NASA ODEO will partner with OCHCO to strengthen data analytics capabilities to enable ODEO to conduct in-depth barrier analyses.	Yes		9/28/2018
9/28/2018	NASA will update and improve its standard data reports to ensure that the necessary data are available for	Yes	3/15/2019	3/15/2019

	conducting barrier analyses related to the disability program.			
9/29/2019	Place information on the NASA website regarding the ABA and how to file a related complaint.	Yes	6/30/2020	4/7/2020
9/30/2020	Leverage current NASA systems and develop additional data tools, including: the FEVS, NASA Human Capital Management Workforce Analysis Business Intelligence Tools, climate surveys, pulse surveys, and potential new database systems. These additional tools will enhance ODEO's ability to analyze programs and practices at more granular levels.	Yes	9/30/2021	9/30/2021
12/31/2020	Award a BPA for PAS to ensure efficiency and consistency across the Agency.	Yes		9/28/2020
4/30/2021	Develop a Disability Resources webpage to provide employees and applicants with information on the application process, Schedule A hiring, requesting an RA in the application process, and the availability of resources to assist in creating a more accessible and inclusive workplace.	Yes		6/16/2021
9/30/2021	Develop a new RAMS to increase RA efficiencies and permit greater insight into RA trends for leadership.	Yes		4/19/2021
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	9/30/2022	
9/30/2021	Change the procurement and purchasing card systems to be in line with 508 compliance.	Yes		9/30/2021
9/30/2022	Develop and deploy a 508 accessibility scanning tool to standardize the process of scanning for compliance issues.	Yes		9/30/2021
Fiscal Year	Accomplishments			
FY 2021	In FY 2021, ODEO DEP implemented the RAMS, which enhances standardization of RA processes and timeliness, and developed a comprehensive Disability Resources page for the ODEO website. This webpage includes an extensive amount of resources, links, educational information, and tools to assist NASA			

	<p>leaders, managers, supervisors, and employees in fulfilling a wide range of disability-related inquiries.</p> <p>In addition, NASA held its first-ever Accessibility Conference. The conference was accessible to all employees through closed captioning, sign language interpretation, and full 508 compliance. NASA also developed a new “HR101” training for new managers and supervisors, including sessions on DEIA, Anti-Harassment, Reasonable Accommodation, EEO Complaint Management, and the full spectrum of hiring flexibilities.</p> <p>The Agency made improvements in processes related to information technology (IT) acquisitions. These processes include reviews to ensure that Section 508 conformance and accessibility are considered for all acquisitions. Further, NASA has renewed an Agency license for Sortsite which allows websites to be scanned for Section 508/IT Accessibility issues.</p>
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4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

All planned activities are being conducted according to the anticipated completion dates.

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

In FY 2021, NASA revised its exit survey to include more diversity, and disability-related questions are forthcoming.

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

Table 1 reveals the following triggers³ (highlighted in yellow) for some traditionally underrepresented groups at NASA, when compared to their total representation:⁴

- **Asian Americans and Pacific Islanders (AAPI)** are underrepresented in SES and SL positions (4.9 percent and 4.2 percent, respectively) compared to their overall participation in the NASA workforce (8.7 percent).
- **Blacks and African Americans** are underrepresented in ST, SL, and student positions (2.3 percent, 1.1 percent, and 7.1 percent), compared to their overall participation in the NASA workforce (10.9 percent).
- **Hispanics and Latinos** are underrepresented in SES, ST, and SL positions (4.9 percent, 3.5 percent, and 6.3 percent, respectively) compared to their overall participation in the NASA workforce (8.7 percent).
- **American Indians and Alaska Natives (AIAN)** represent 1.0 percent of the NASA workforce. Their small number (175 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 through GS-15 positions (19.8 percent, 17.9 percent, and 30.6 percent, respectively) compared to their overall representation at NASA (34.9 percent) of the NASA workforce.

³ 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/>>.

⁴ EEOC identifies the appropriate benchmarks for comparison. The total agency workforce should be compared to the Civilian Labor Force (CLF), which includes all non-institutionalized civilians age 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.

Table 1. NASA Employees (Selected Groups) by Race, Ethnicity, and Gender: FY 2021

NASA Workforce	Total Number	AAPI	Black	Hispanic	AIAN	White	Multi-Racial	Undeclared	Male	Female
All Employees:	18,339	8.7%	10.9%	8.7%	1.0%	70.0%	0.4%	0.4%	65.1%	34.9%
Permanent	16,771	8.3%	11.3%	8.4%	1.0%	70.4%	0.4%	0.2%	65.3%	34.7%
Temporary	952	11.6%	6.4%	9.6%	0.2%	68.7%	0.4%	3.2%	63.2%	36.8%
Students	616	15.7%	7.1%	15.3%	0.8%	59.3%	0.6%	1.1%	63.1%	36.9%
All Employees, by Grade:										
SES/Other Executives	430	4.9%	11.4%	4.9%	0.7%	77.7%	0.5%	0.0%	65.1%	34.9%
ST	86	12.8%	2.3%	3.5%	0.0%	81.4%	0.0%	0.0%	80.2%	19.8%
SL	95	4.2%	1.1%	6.3%	2.1%	86.3%	0.0%	0.0%	82.1%	17.9%
GS-14 – GS-15	9,706	8.7%	9.4%	7.1%	0.9%	73.6%	0.2%	0.2%	69.4%	30.6%
GS-11 – GS-13	6,857	8.5%	13.2%	10.5%	1.2%	65.7%	0.5%	0.4%	60.8%	39.2%
GS-03 – GS-10	1,066	12.3%	12.8%	13.8%	0.6%	58.4%	0.8%	1.3%	51.0%	49.0%
All Other Pay Rates	99	9.1%	2.0%	7.1%	0.0%	75.8%	1.0%	5.1%	64.6%	35.4%
Other Groups:										
Supervisors	2,927	5.6%	12.5%	7.5%	0.7%	73.2%	0.3%	0.1%	63.9%	36.1%
Comparison Populations:										
Federal STEM Workforce	346,123	9.8%	10.3%	6.4%	0.8%	70.4%	2.0%	0.3%	69.8%	30.2%
Civilian Labor Force		4.6%	12.3%	13.0%	0.6%	67.5%	2.1%	--	51.8%	48.2%

Notes: Triggers highlighted in yellow. “All Other Pay Rates” includes: pay rates for Advisory Committee Members, Experts, and Consultants, and administrative determined rates. “Students” are interns hired through OPM’s Pathways program.

Sources: NASA Personnel Data Warehouse (PDW) (data as of 09/30/2021); Office of Personnel Management (OPM), FedScope, Federal Human Resources Data, Diversity Cube and Employment Cube (U.S.-based employees only) (data as of 6/30/2021, 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>>; 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>>.

As shown in Table 1, the composition of the NASA workforce by race and ethnicity is similar to the CLF, with three exceptions: NASA employs a higher percentage of AAPI and a lower percentage of both Hispanics and Women than their representation in the CLF. (AAPI account for 8.7 percent of the NASA workforce, compared to 4.6 percent in the CLF; Hispanics are 8.47 percent of the NASA workforce and 10.0 percent of the CLF; and women are 34.9 percent of the NASA workforce and 48.2 percent of the CLF.) However, 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, other benchmarks can be used. Comparing NASA to the Federal STEM workforce reveals few differences. In fact, NASA’s workforce is similar to the Federal STEM workforce with the exception of the employment of Hispanics and women, who are employed in higher percentages at NASA.

Occupational Categories, by Race and Ethnicity

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). In addition,

data on recent college graduates provides insight into the pipeline for similar jobs. Thus, employment ratios below the RCLF for any group is another trigger.⁵ Tables 2 and 3 reveal the following:

- In mission critical engineering positions, Blacks, Hispanics, and Women are employed at higher percentages at NASA than in the RCLF. However, **AAPI are employed in lower percentages at NASA than in the RCLF in Aerospace and General Engineering positions.** (See Table 2.)
- Among Physical Scientists, Whites are well-represented at NASA compared to Physical Scientists in the RCLF, and Blacks and Hispanics are employed in similar proportions to those in the RCLF. However, **Women account for 32.1 percent of Physical Scientists at NASA and 39.1 percent of those in the RCLF.** (See Table 3.)
- Compared to the RCLF, AAPI, Blacks, Hispanics, and Women are overrepresented in several Professional Administrative (PA) occupations, while **Whites and Males are underrepresented in PA positions.** (See Table 4.)
- Whites and Males are underrepresented in several NASA S&E occupations, compared to the RCLF. However, because they account for the majority of employees in those occupations, NASA will focus on other triggers first.

Table 2. NASA Mission Critical S&E Occupations by Race, Ethnicity, and Gender: FY 2021

		AAPI	Black	Hispanic	Multi-racial	AIAN	White	Male	Female
<i>Engineering Occupations:</i>									
0861 - Aerospace Engineer (n=4,474)	NASA:	9.3%	5.9%	8.4%	0.2%	0.6%	75.2%	78.1%	21.9%
	RCLF:	11.2%	4.2%	7.8%	2.4%	0.3%	74.1%	87.4%	12.6%
0801 - General Engineer (n=3,326)	NASA:	7.1%	6.7%	8.0%	0.3%	1.1%	76.6%	70.9%	29.1%
	RCLF:	12.1%	4.8%	6.9%	2.0%	0.2%	74.0%	87.1%	12.9%
0855 - Electronics Engineer (n=813)	NASA:	16.6%	6.2%	9.7%	0.1%	0.5%	66.8%	84.9%	15.1%
	RCLF:	12.1%	5.6%	7.3%	2.1%	0.2%	72.8%	91.1%	8.9%
0854 - Computer Engineer (n=765)	NASA:	15.0%	9.5%	9.0%	0.3%	0.7%	65.2%	73.5%	26.5%
	RCLF:	19.0%	8.4%	6.7%	1.7%	0.1%	64.2%	85.9%	14.1%
0850 - Electrical Engineer (n=340)	NASA:	12.9%	7.1%	12.4%	0.3%	0.5%	66.8%	84.9%	15.1%
	RCLF:	12.1%	5.6%	7.3%	2.1%	0.2%	72.8%	91.1%	8.9%
<i>Physical Science Occupations:</i>									
1301 - Physical Scientist (n=468)	NASA:	13.2%	3.2%	5.6%	0.0%	0.2%	77.6%	68.8%	31.2%
	RCLF:	16.4%	3.8%	5.6%	2.3%	0.2%	71.8%	56.6%	43.4%
1330 - Space Scientist (n=339)	NASA:	7.1%	1.5%	7.1%	0.0%	0.0%	84.1%	68.7%	31.3%
	RCLF:	8.6%	3.6%	4.7%	1.8%	0.2%	81.0%	81.0%	19.0%

⁵ 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 and Other Professional Administrative Occupations by Race, Ethnicity, and Gender: FY 2021

		AAPI	Black	Hispanic	Multi-racial	AIAN	White	Male	Female
0301 - General Administrative* (n=936)	NASA:	4.9%	19.1%	7.9%	0.9%	13%	65.4%	37.4%	62.6%
	RCLF:	6.3%	12.5%	8.7%	0.6%	1.0%	70.9%	36.7%	63.3%
1102 - Contract Specialist* (n=755)	NASA:	5.1%	27.1%	10.6%	0.7%	0.7%	55.9%	40.3%	59.7%
	RCLF:	3.3%	8.5%	7.1%	0.4%	0.8%	80.0%	46.2%	53.8%
0343 – Management and Program Analyst* (n=737)	NASA:	7.6%	16.4%	11.1%	0.5%	1.5%	62.1%	36.8%	63.2%
	RCLF:	5.9%	6.8%	4.6%	0.5%	0.6%	81.6%	58.4%	41.6%
2210 - Information Technology Specialist (n=559)	NASA:	7.7%	17.2%	7.0%	0.9%	1.4%	65.5%	60.6%	39.4%
	RCLF:	6.8%	11.1%	7.6%	0.6%	0.8%	73.1%	70.4%	29.6%
0510 - Accountant (n=288)	NASA:	12.5%	30.6%	8.7%	0.0%	1.0%	46.9%	30.9%	69.1%
	RCLF:	8.6%	8.1%	6.1%	0.5%	0.6%	76.0%	39.9%	60.1%
0501 - Finance (n=304)	NASA:	6.9%	23.7%	8.2%	0.0%	0.7%	60.5%	31.3%	68.8%
	RCLF:	5.0%	12.3%	9.8%	0.5%	1.2%	71.1%	43.7%	56.3%
0201 - Human Resources Specialist (n=300)	NASA:	6.7%	26.7%	9.0%	1.7%	1.0%	54.3%	27.7%	72.3%
	RCLF:	4.3%	10.4%	9.5%	0.5%	0.7%	74.6%	39.7%	60.3%

Notes for Tables 2 and 3: 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 9/30/2021); 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 three years. NASA exceeds the Federal goal for the employment of IWD and IWTD in grades GS-10 and below, is slightly below the goal for IWD in grades GS-11 and above, and is just above the goal for the employment of IWTD in grades GS-11 and above. (See Table 4.)

Table 4. NASA Employees with Disabilities: FY 2018 – FY 2020

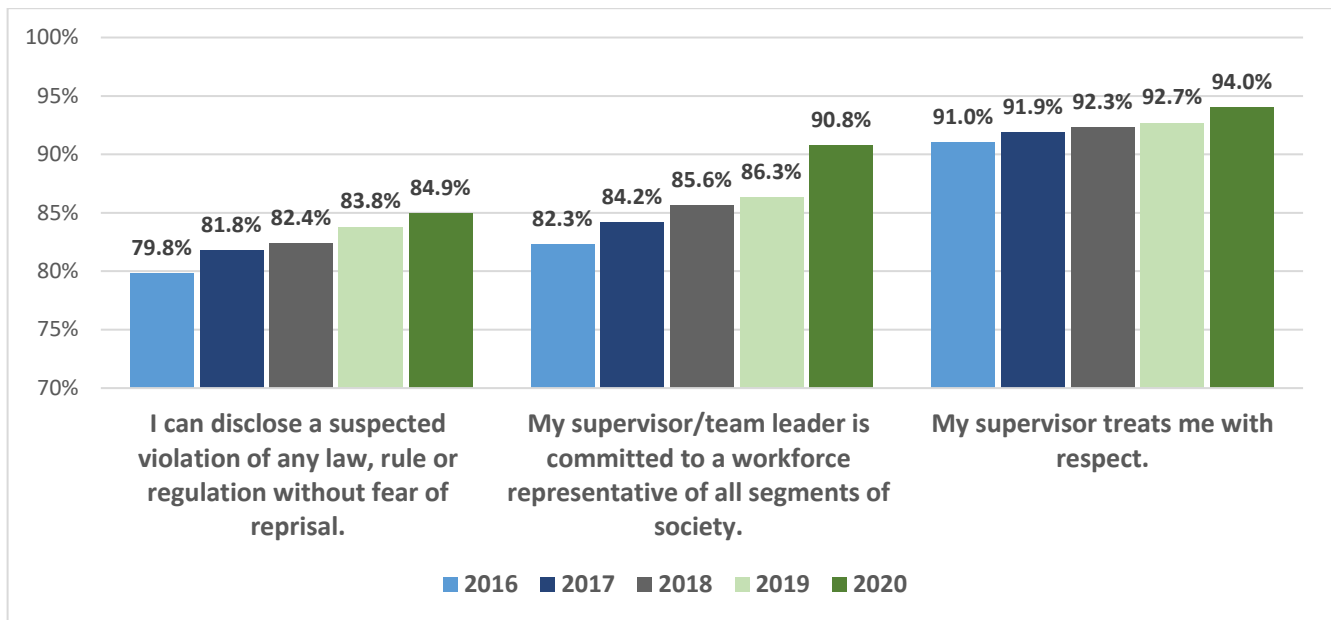
	FY 2019	FY 2020	FY 2021	Federal Goal
GS-10 and Below:				
IWD	23.9%	24.3%	22.5%	12%
IWTD	7.3%	6.5%	5.0%	2%
GS-11 and Above:				
IWD	10.6%	11.9%	13.1%	12%
IWTD	2.4%	2.6%	2.6%	2%

Source: NASA PDW; data as of the last pay period in FY 2020. NASA revised its calculations in September 2020 to better conform with EEOC requirements, which requires agencies to report only on full-time permanent employees. Data on ITD 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 has continued to improve its FEVS scores.⁶ Although the FEVS' New Inclusion Quotient (New IQ) was not calculated in the most recent survey, due to the limited number of New IQ questions asked, NASA's scores on several questions related to DEIA and compliance increased. For example, between 2019 and 2020, 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 86.3 percent to 90.8 percent (see Figure 1). In addition, the percentage of positive responses to the statement "NASA leaders take proactive steps to prevent harassment in the workplace (for example, senior leadership messages to the workforce, use of posters and other communication materials, training, dialogues, or similar activities)" increased from 80.3 percent in 2019 to 88.7 percent in 2020 (this question was first asked in 2019).

Figure 1. FEVS Questions Focused on DEIA and Compliance: FY 2016-20



Source: OPM, 2020 FEVS Results. Percentages represent the percentage of responses that were positive. Government-wide, there were 624,800 respondents; there were 10,588 NASA respondents. Because of the COVID-19 global pandemic, OPM administered the 2020 FEVS at a later date than in previous years; thus, data were not available until FY 2021. Similarly, the 2021 FEVS was administered in the first quarter of FY 2022.

⁶ The FEVS is a climate survey conducted by OPM. The New IQ is calculated by averaging a subset of 20 FEVS questions measuring five factors: Empowered, Supportive, Cooperative, Open, and Fair. The Employee Engagement Index is calculated by averaging a subset of FEVS questions measuring three factors: Intrinsic Work Experience, Supervisors, and Leaders.

APPENDIX B: PHYSICAL SCIENCE BARRIER ANALYSIS PLAN AND INITIAL FINDINGS

Barrier Analysis Overview

Purpose: NASA identified workforce triggers⁷ for Women and Asian Americans and Pacific Islanders (AAPI)⁸ within Physical Science occupations, when compared to the Relevant Civilian Labor Force (RCLF).⁹ 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.

⁷ 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.

⁸ 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.

⁹ 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.

Date Examined: First, NASA reexamined that 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: This phase is currently in the final stages; results are expected to be finalized in early FY 2022.

Subsequent Phases and Approximate Timeline

Phase 5: In Phase 5, NASA will use the data and information examined in the preceding phases to transform areas of concern into survey topics of inquiry. Staff will develop psychometric survey measures to further investigate, validate, and understand where barriers to equal employment opportunity might exist. Staff will distribute the survey to all NASA civil servant Physical Scientists and the data collected will be analyzed using quantitative inferential analytic techniques. ***Expected Completion: March 31, 2022.***

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: June 30, 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: September 30, 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