National Aeronautics and Space Administration

NASA Model Equal Employment Opportunity (EEO) Agency Plan: FY 17-19 and FY 16 EEO Program Accomplishment Report

Office of Diversity and Equal Opportunity

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Introduction to the NASA Model EEO Agency Plan and Accomplishment Report

Background

NASA demonstrates its commitment to equal employment opportunity (EEO) in the workplace through a variety of means, including the development and implementation of a 3-year "Model EEO Agency Plan" ("EEO Plan"). This plan, required by the U.S. Equal Employment Opportunity Commission (EEOC), under Management Directive 715 (MD-715), is used by Agency leadership to ensure equal opportunity and program accountability in NASA programs. Consistent with NASA's core values, however, NASA's Model EEO Agency Plan goes beyond the minimum requirements of EEOC's MD-715 and challenges NASA to achieve excellence.

NASA's Office of Diversity and Equal Opportunity (ODEO) leads the effort to evaluate NASA's management infrastructure, including policies, procedures, and practices, to identify challenges to EEO, and to develop actions to address them. In FY 14, ODEO developed a streamlined approach to the Agency EEO Plan. The new approach has two purposes: 1) to focus attention and actions on a limited number of high-priority challenges; and 2) to define the over-arching Agency challenges and strategies, but leave it to the Centers to define the tactical actions they will use to address the challenges. This was a departure from the past, when ODEO identified a number of detailed actions for all Centers to implement. The FY 17-19 Model Agency EEO Plan is the second 3-year plan under this streamlined approach.

Methodology

NASA's Model EEO Plan is based on the six essential elements of a Model EEO Agency identified by EEOC: (1) Demonstrated Leadership Commitment, (2) Proactive Prevention of Discriminatory Actions, (3) Integration of EEO into the Agency Strategic Mission, (4) Management and Program Accountability, (5) Efficiency of EEO Operations, and (6) Responsiveness and Legal Compliance.

In developing the plan for FY 17 through FY 19, ODEO established a working group; reviewed the challenges, strategies, and results of the FY 14-16 EEO Plan; and consulted with Center Equal Opportunity (EO) offices and other NASA offices to identify challenges relating to the six essential elements of a Model EEO Agency throughout NASA. In addition, ODEO analyzed workforce data (including demographic data, data on personnel actions), the results of the 2014 NASA Diversity and Inclusion (D&I) survey, and data from the 2015 and 2016 Federal Employee Viewpoint Surveys (EVS) to identify areas where EEO groups may be faring differently or having different experiences than other groups at NASA. ODEO used this information to develop strategies and actions to address the challenges identified. These strategies are intended to "attract and advance a highly skilled, competent, and diverse workforce…" consistent with Objective 3.1 of the NASA Strategic Plan.

The accomplishments and activities highlighted in this report were compiled by ODEO staff and staff of NASA Center[1] EO offices. Accomplishments reported here correspond to the high-priority challenges

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[1] For the purposes of this Plan, "Center" includes Headquarters (HQ) and the NASA Shared Services Center (NSSC), as well as the nine field Centers.

identified in the FY 14-16 EEO Plan; Centers may report additional accomplishments that reflect Center-level challenges and strategies.

Findings and Accomplishments

As in previous years, in FY 16, NASA ODEO and Center EO offices undertook many activities to address EEO in the NASA workforce. These activities included:
- presenting detailed workforce analyses at various forums to highlight where EEO gaps exist;
- participating on a variety of Agency-led committees and teams;
- providing input and advice regarding performance ratings, promotions, awards, and leadership development programs;
- sustaining and enhancing programs such as the Anti-Harassment Program, the Conflict Management Program, and Special Emphasis Programs;
- processing and resolving complaints of discrimination or harassment;
- encouraging the use of Alternative Dispute Resolution (ADR) in the EEO complaints process;
- overseeing and advising on requests for reasonable accommodations for individuals with disabilities; and
- developing and delivering a variety of outreach and education programs.

Nonetheless, there is room for improvement in several areas, such as recruitment of women and minorities in certain positions as well as promotions. Details on specific activities are provided in the section of this report titled, "FY 16 EEO Program Accomplishment Report."

Organization of Report

Part I of this document presents the NASA Model EEO Agency Plan for FY 17-19. This plan identifies the challenges to EEO faced by NASA and strategies and actions to address those challenges. The plan details specific measures of success and includes target beginning and completion dates.

Part II of this document summarizes NASA FY 16 EEO accomplishments, based on the FY 14-16 EEO Plan. This section discusses workforce data analyses that also informed the development of the FY 17-19 Plan and areas of continuing concern are highlighted. The data in this section also establish the baseline from which to measure the progress of the FY 17-19 EEO Plan. A detailed description of the status of each strategy and action in the FY 14-16 Plan is provided in the Appendix.

Part I: FY 17-19 NASA Model EEO Agency Plan

CHALLENGE 1. DEMONSTRATED LEADERSHIP COMMITMENT

Statement of the Challenge: NASA leadership will continually demonstrate its commitment to EEO by affirming EEO policies, communicating EEO messages, and modeling EEO in personnel actions to ensure that the message of commitment reaches all employees.

Findings: Among NASA employees who responded to the NASA Diversity & Inclusion Survey and the Employee Viewpoint Survey, there are differences by race, ethnicity, gender, and disability status regarding employee views and perspectives on leadership commitment to EEO and the effectiveness of EEO policies and practices:[2]

- Non-White employees are less likely than White employees to agree that NASA values employees with varied backgrounds and experiences (66% and 81%, respectively, including 71% of Asian Americans and Pacific Islanders (AAPI), 70% of Hispanics, 66% of multiracial employees, 64% of American Indians and Alaska Natives (AIAN), and 62% of Blacks).
- Fewer non-White (49%) than White (58%) employees agree that NASA Center leadership helps employees recognize biases that foster workplace discrimination or exclusion.
- Fewer non-White than White employees and fewer women than men agreed that Agency policies and programs promote diversity in the workplace (81% of Whites, 80% of men, 75% of women and Asians, 74% of individuals with disabilities (IWD), and 67% of Blacks).

Strategies to Address the Challenge:

Strategy 1.1 At the Agency level, NASA senior leadership conveys the importance of EEO to the workforce through dissemination of Agency policy, strategic planning activities, Core Values messaging, and leadership behaviors reflective of EEO principles. *Lead Offices/Officials: NASA Administrator, Deputy Administrator, Associate Administrator, Officials-in-Charge of Headquarters Offices.*

Actions	Measurement	Implementation Timeframe	
		Begin	**End[3]**
1. The Administrator issues annual EEO and Anti-Harassment policy statements; provides policy statements and annual Model EEO Agency Plan updates to Officials-in-Charge.	Policies/plans transmitted timely	Q2, 2017	Q4, 2019
2. Agency senior management addresses Agency personnel and external stakeholders on EEO or D&I matters via in-person events, pre-recorded videos, or similar means.	Change in EVS and D&I responses	Q3, 2017	Q4, 2019

Strategy 1.2 At the Center level, Centers operationalize this Plan through Model EEO Center Implementation Plans that align with the Agency plan. Center leadership also models behaviors reflective of EEO. *Lead Offices/Officials: Center Directors, other Center Senior Leadership*

Actions	Measurement	Implementation Timeframe	
		Begin	**End**
1. Center Directors develop and issue Model EEO Center Plans for FY 18-20 that are aligned with the Model EEO Agency Plan.	Plans issued by 1/31/18	Q2, 2017	Q2, 2018
2. Center Directors issue Center EO and Anti-Harassment policies, or affirm the Agency policies.	Statements issued timely	Q3, 2017	Q4, 2019

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[2] 2014 NASA D&I Assessment Survey, Final Report, Jan. 2015, pp. E-8, E-17, F-17; 2015 Employee Viewpoint Survey (EVS) Results Disability Status Comparison Report, p. 8; EVS Results Gender Comparison Report, p. 8; EVS Results Race Comparison Report, p. 12. The response rates for the D&I survey and the EVS were 36.8 percent and 59.2 percent, respectively.

[3] Note that some end dates may reflect the end of this three-year plan, although the actions may be ongoing or annual actions.

CHALLENGE 2. PROACTIVE PREVENTION OF DISCRIMINATORY ACTIONS

Statement of the Challenge: NASA will advance EEO in hiring, promotions, leadership development, and awards to provide work environments that honor the values of excellence, inclusion, teamwork, and safety.

Findings: Diversity in the NASA workforce does not reflect diversity in the civilian labor force for certain positions, and employee opinions regarding hiring, promotions, and other opportunities differ by group:[4]

- Women and minorities in NASA Aerospace Technology (AST) positions are underrepresented in comparison to the relevant civilian labor force (RCLF).
- NASA is below the Government-wide goal for employment of Individuals with Targeted Disabilities (IWTD).
- More female (19%) than male (6%) employees and more non-White (22%) than White (5%) employees have felt out of place at work because of their gender or race.
- Individuals with disabilities (IWD) and AIAN employees are less likely than other employees to agree that their talents are well-used in the workplace (percentage that agreed: 63% of IWD, 72% of individuals without a disability; 60% of AIAN, 73% of AAPI, 73% of White, and 70% of Black employees; 72% of females, 71% of males).
- Just over half of all NASA employees agree that promotions in their work unit are based on merit.
- AAPI, Black, Hispanic, and AIAN employees are underrepresented in promotions to GS-14 in comparison to their representation in GS-13 positions at NASA. Likewise, AAPI and Hispanics also are underrepresented in promotions to GS-15.

Strategies to Address the Challenge:

Strategy 2.1 NASA engages in robust Agency outreach and recruitment activities that include individuals from groups who are underrepresented in the NASA workforce and in various NASA occupations. *Lead Offices/Officials: ODEO, Office of Human Capital Management (OHCM), Education*			
Actions	**Measure(s)**	**Implementation Timeframe**	
		Begin	***End***
1. ODEO collaborates with OHCM to implement recommendations from the Agency's Baseline Services Assessment for Human Capital regarding recruitment, including: (1) conducting an assessment of current NASA Recruitment Activities and identify best and most innovative practices; (2) developing an Agency-wide digital recruitment strategy, with sequential milestones and activities clearly defined; and (3) developing an Agency-wide recruitment event framework, where Centers coordinate with each other for coverage and there is greater accountability and collaboration.	ODEO included in OHCM deliberations; recommen-dations implemented	Q1, 2017	Q4, 2019
2. ODEO analyzes NASA workforce by both occupation and demographic characteristics, including identifying the RCLF for all NASA occupations.	Analysis completed	Q3, 2016	Q4, 2017
3. ODEO inventories current outreach and recruitment activities conducted by ODEO and Center EO offices, including number of years conducted, and reports on promising practices.	Inventory completed	Q1, 2017	Q3, 2018
4. Agency and Center Special Emphasis Program Managers (SEPMs) forward NASA job announcements to organizations, such as the Society of Women Engineers and National Society for Black Engineers, for distribution and posting on Web sites.	Number of announcements posted	Q1, 2018	Q4, 2019
5. ODEO enhances its Web site to focus more on outreach to underrepresented and underserved groups.	Enhancements completed	Q2, 2017	Q4, 2019

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[4] 2014 NASA D&I Report, pp. E-27, E-28; EVS Results (Disability), pp. 3, 6; EVS Results (Gender), pp. 3, 6 ; EVS Results (Race), pp. 5, 12. See also workforce data analyses in Part II of this report.

Strategy 2.2 NASA increases utilization of hiring authorities for IWD, such as schedule A. *Lead Offices/Officials: ODEO,*			
Actions	**Measure(s)**	**Implementation Timeframe**	
		Begin	***End***
1. Agency and Center EO and HR offices provide information and training to Agency hiring managers regarding individuals with disabilities and targeted disabilities.	Percentage of IWD and IWTD increases	Q1, 2017	Q4, 2019
2. Agency and Center EO and HR offices collaborate to identify potential Schedule A candidates.	No. of Schedule A hires increases	Q1, 2017	Q4, 2019

Strategy 2.3 NASA takes steps to ensure equal opportunity in promotions, performance ratings, awards (performance and honorary), and leadership development programs. *Lead Offices/Officials: ODEO, OHCM*			
Actions	**Measure(s)**	**Implementation Timeframe**	
		Begin	***End***
1. The Associate Administrator (AA), ODEO, continues to serve on the NASA Performance Review Board, Executive Resources Board, and Employee Development Advisory Board and participate in other high-level meetings to ensure EO and demographic diversity are supported during discussions and decision making.	AA regularly involved in review boards and relevant high-level meetings	Q1, 2017	Q4, 2019
2. ODEO and OHCM review systems and processes for promotions, awards, performance ratings, and leadership development programs; brief senior leadership on potential disparities for women, minorities, and IWD; and provide recommendations for improvements.	ODEO regularly briefs leadership on potential disparities	Q1, 2017	Q4, 2019

Strategy 2.4 NASA better utilizes Special Emphasis Programs to proactively prevent discrimination. *Lead Office/Official:*			
Actions	**Measure(s)**	**Implementation Timeframe**	
		Begin	***End***
1. NASA Centers complete SEPM Self-Evaluation Checklist (included in ODEO's January 2016 SEPM Guidance) annually and the Agency uses the information to guide SEP planning and management.	Checklist competed by 9/30 each year	Q4, 2017	Q4, 2019
2. Centers address any areas of concern identified by SEPM self-evaluation in Center EEO plans.	Issues addressed in plans	Q1, 2017	Q4, 2019

Strategy 2.5 Improve communication to NASA employees regarding EEO principles and issues and continue education			
Actions	**Measure(s)**	**Implementation Timeframe**	
		Begin	***End***
1. ODEO continues to provide EO training and information under its Anti-Harassment and Conflict Management Programs and expand its training portfolio through "just-in-time" trainings in a variety of areas, such as selection panel participation.	Information provided timely	Q1, 2017	Q4, 2019
2. ODEO continues to update its online Information Resource Guide.	Updates completed	Q1, 2017	Q4, 2019

CHALLENGE 3. INTEGRATION OF EEO INTO THE AGENCY STRATEGIC MISSION

Statement of the Challenge: EEO will be viewed as a fundamental part of the NASA mission and critical to strategic planning and key workforce decision making.

Findings: Employee perceptions regarding leadership commitment, effectiveness of policies, and fairness in human capital related processes appear to differ by race, gender, and disability status (see findings under Challenges 1 and 2); thus, NASA must continue to ensure that equal opportunity, diversity, and inclusion are understood to be essential to the NASA mission.

Strategies to Address the Challenge:

Strategy 3.1 NASA includes EEO performance in the Agency Strategic Plan. *Lead Offices/Officials: ODEO, Office of the Chief Financial Officer (OCFO)*			
Actions	**Measure(s)**	**Implementation Timeframe**	
		Begin	*End*
• ODEO develops multi-year EEO goals and annual performance indicators and reports progress to the OCFO.	Indicators included	Q1, 2017	Q4, 2019

Strategy 3.2 ODEO communicates EEO concerns, priorities, and performance indicators to the Administrator and other Agency leadership on a regular basis. *Lead Office/Official: AA, ODEO*			
Actions	**Measurement**	**Implementation Timeframe**	
		Begin	*End*
1. The AA, ODEO, meets monthly with the NASA Administrator to keep him or her apprised of leading EEO issues and concerns.	Monthly meetings held	Q1, 2017	Q4, 2019
2. ODEO reports on EEO progress at least twice per year at the Baseline Performance Review meetings.	Biannual reporting	Q1, 2017	Q4, 2019
3. ODEO presents annual "State of EEO" briefing to NASA senior leadership.	Annual briefing held	Q1, 2017	Q4, 2019

Strategy 3.3 NASA considers EEO in Agency deliberations prior to decisions regarding recruitment strategies, succession planning, and other workforce policies and plans that may impact EEO progress directly or indirectly. *Lead Offices/ Officials: NASA Administrator, Officials-in-Charge of Headquarters Offices*			
Actions	**Measurement**	**Implementation Timeframe**	
		Begin	*End*
1. The AA, ODEO, or his/her representative participates in executive-level meetings such as the Strategic Management Council to ensure EEO is supported in top-level decision making.	No. and types of meetings participated in	Q1, 2017	Q4, 2019
2. The AA, ODEO, and the Assistant Administrator, OHCM, meet regularly to discuss overlapping areas of concern and develop collaborative programmatic strategies.	Meetings held	Q1, 2017	Q4, 2019

CHALLENGE 4. MANAGEMENT AND PROGRAM ACCOUNTABILITY

Statement of the Challenge: NASA managers and supervisors will be held accountable for advancing EEO to better ensure healthy work environments in which fairness and equity can thrive.

Findings: Employees with disabilities, women, and members of minority groups are less likely to agree that NASA effectively addresses discrimination and unfair practices:[5]

- Fewer non-White (59%) than White (76%) employees agreed that supervisors and managers investigate reports of unfair treatment.
- Fewer non-White (59%) than White (71%) employees agreed that supervisors, managers, and Agency leaders are held accountable for ensuring that employees are treated fairly.
- Individuals with disabilities (71%) and women (80%) were less likely than individuals without a disability (85%) and men (85%) to agree that prohibited personnel practices, such as discrimination, are not tolerated at NASA.

Strategies to Address the Challenge:

Strategy 4.1 NASA rates managers and supervisors on EEO performance as part of their annual performance appraisals. *Lead Offices/Officials: NASA Administrator, second-level (and above) supervisors, ODEO, OHCM*			
Actions	**Measurement**	**Implementation Timeframe**	
		Begin	*End*
• ODEO and Center EO offices provide guidance on valid and effective EEO and diversity performance indicators.	Type and extent of guidance provided	Q3, 2017	Q4, 2019

Strategy 4.2 ODEO evaluates EEO operations through onsite functional reviews of NASA Centers. *Lead Office/ Official: ODEO*			
Actions	**Measurement**	**Implementation Timeframe**	
		Begin	*End*
1. ODEO conducts at least one onsite EEO/diversity functional review of a NASA Center and report findings, recommendations, and promising practices to the Center Director and EEO Director.	Functional review completed	Q4, 2017	Q4, 2019
2. Centers address recommendations from ODEO functional reviews.	Recommendations addressed	Q4, 2017	Q4, 2019

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[5] 2014 NASA D&I Report, pp. E-11, E-12, E-19; EVS Results (Disability), p. 9; EVS Results (Gender), p. 9.

CHALLENGE 5. EFFICIENCY OF EEO OPERATIONS

Statement of the Challenge: NASA will improve EEO delivery through more efficient systems and processes designed to address EEO matters in a timely and effective manner.

Findings:

- NASA's ADR participation rate at the informal stage (50%) is lower than the Government-wide rate (88%) and that of comparable agencies.
- The Government-wide participation rate at the formal stage is 9%. In FY 16, NASA's participation rate at the formal stage was 72% (but only 3% in FY 15).
- NASA has been challenged in meeting regulatory timeframes for complaints processing. One reason for this is that the Complaints Management Division, due to hiring freeze, has been unable to replace experienced EEO specialists who have left the Agency. As a result, processing times for various aspects of the complaints process, including investigations and adjudications, have been impacted.

Strategies to Address the Challenge:

Strategy 5.1 NASA continues to advocate EEO ADR as a highly effective and cost-efficient means of resolving EEO disputes. To this end, the EEO ADR shall be utilized to the maximum extent practicable at the earliest opportunity. *Lead Office/Official: ODEO*

Actions	Measurement	Implementation Timeframe	
		Begin	*End*
1. NASA offers ADR to the aggrieved and/or complainant at all times, with a few exemptions. Decisions not to offer ADR in an individual case shall be based exclusively on the criteria listed under NASA Procedural Requirements (NPR) 3713.2A, and shall be in writing, and shall articulate the reason why ADR was not offered.	Change in ADR offer rate	Q2, 2017	Q4, 2019
2. NASA will begin aggressive marketing of ADR by developing an ADR resource or toolkit that will include an ADR Web site, new brochure and quick tips card for Managers and Supervisors, and updated brochure for employees.	Change in ADR participation rate	Q3, 2017	Q4, 2019
3. ODEO develops and deploys mandatory EEO ADR training to managers and supervisors.	No. employees trained	Q4, 2017	Q4, 2019
4. ODEO develops and deploys supplemental or "Just in Time" training for managers and supervisors.	No. employees trained	Q4, 2017	Q4, 2019
5. ODEO develops and deploys ADR training for EEO staff and ADR teams.	No. employees trained	Q4, 2017	Q4, 2019

Strategy 5.2 ODEO streamlines processing of discrimination complaints (e.g., informal processing, investigations, and final Agency decisions (FADs)) to meet regulatory timeframes. *Lead Office/Official: ODEO*

Actions	Measurement	Implementation Timeframe	
		Begin	*End*
1. ODEO streamlines the process of issuing acceptance/review letters, investigations, and FADs by eliminating duplicative layers of review and shortening the review and approval periods.	Improved processing time	Q4, 2017	Q4, 2019
2. On a monthly basis, ODEO reviews informal complaint processing data by Center to track compliance to regulatory requirements and address timeliness and quality of processing issues as expeditiously as possible when there is a need.	Timeliness and quality increased	Q4, 2017	Q4, 2019

CHALLENGE 6. RESPONSIVENESS AND LEGAL COMPLIANCE

Statement of the Challenge: NASA will be in compliance with EEO statutes, EEOC regulations and guidance, and with its own Policy Directives and Procedural Requirements to ensure legal compliance.

Findings: Several NASA employees have reported that they have been harassed about differences or feel that there would be negative consequences if they reported unfair treatment. In addition, many do not know the process for requesting a reasonable accommodation. For example:[6]

1. More non-White (31%) than White (20%) employees feel there would be negative consequences if they reported unfair treatment at work.
2. Nearly one-third of NASA employees are unsure or do not know the process for requesting a reasonable accommodation.
3. More non-White (12%) than White employees (7%) stated they had been harassed about differences or perceived differences in their personal characteristics.

Strategies to Address the Challenge:

Actions	Measurement	Implementation Timeframe	
Strategy 6.1 NASA improves timeliness and consistency in providing reasonable accommodations to qualified individuals with disabilities. *Lead Office/Official: ODEO*			
		Begin	*End*
• ODEO tracks and analyzes reasonable accommodations (RA), pursuant to the updated NPR 3713.1A.	RA information quantified	Q3, 2017	Q4, 2019

Actions	Measurement	Implementation Timeframe	
Strategy 6.2 ODEO continues to enhance the Agency's Anti-Harassment Program to ensure it comports with EEOC guidance. *Lead Office/Official: ODEO*			
		Begin	*End*
• ODEO issues updated Anti-Harassment Implementation Guide as part of ongoing technical assistance and training for the Agency anti-harassment practice community.	Guide updated and issued	FY 16	Q4, 2017

Actions	Measurement	Implementation Timeframe	
Strategy 6.3 ODEO ensures that NASA is in compliance with revisions to MD-110, issued in August 2015. *Lead Office/Official: ODEO*			
		Begin	*End*
• ODEO updates NPD 3713.6 to incorporate changes made to MD-110.	NPD reissued	FY 16	Q3, 2017

Actions	Measurement	Implementation Timeframe	
Strategy 6.4 NASA continues to upgrade its facilities to ensure compliance with Federal law and accessibility for IWD. *Lead Offices/Officials: ODEO, Office of Strategic Infrastructure*			
		Begin	*End*
• NASA identifies and increases number of facilities accessible to IWD (that need to be).	No. of compliant facilities	Q1, 2017	Ongoing

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[6] 2014 NASA D&I Report, pp. iv, E-25, E-36, E-38, E-39.

Part II: FY 16 EEO Program Accomplishment Report

The FY 16 accomplishments below highlight the ongoing work of the Agency as well as the status of strategies and actions in the NASA FY 14-16 Model EEO Agency Plan Update. Several ongoing and annual actions have been transferred to the FY 17-19 plan as well as actions for which the implementation timeline has been extended. A complete status report for the FY 14-16 plan appears in the Appendix.

CHALLENGE 1. DEMONSTRATED LEADERSHIP COMMITMENT

NASA leadership will continually demonstrate its commitment to EEO by affirming EEO policies, communicating EEO messages, and modeling EEO in personnel actions to ensure that the message of commitment reaches all employees.

Strategy 1.1. NASA senior leadership conveys the importance of EEO through Agency policy, strategic planning, messaging, and behaviors reflective of EEO principles. In FY 16, NASA leadership demonstrated its commitment to EEO through a variety of means, including affirming EEO policies, communicating EEO messages, and modeling EEO in personnel actions. The NASA Administrator, Charles F. Bolden, Jr., signed the annual Model EEO Agency Plan Update, EEO Plan Accomplishments, and EEO and anti-harassment policies on February 16, 2016. These documents were transmitted to NASA OICs and Center Directors on March 15, 2016, after all documents were made Section 508 compliant.

Agency leaders also participated in events and activities that demonstrated their commitment to EO and D&I in FY 16. For example:

- In January, NASA coordinated with the Capital Area Food Bank to participate in a Martin Luther King, Jr., Day Community Service Project. NASA Deputy Administrator Dava Newman and Chief Technologist Dave Miller, along with other NASA employees, volunteered at the Joyful Food Market at Plummer Elementary School in Washington, DC, assisting with the setup and management of a healthy food market, supporting cooking demos for healthy recipes, and helping children and families with food shopping.
- In February, Administrator Bolden attended and delivered the opening remarks for NASA's Black History Month Celebration, at which he honored several of NASA's African American trailblazers.
- On March 12, 2016, both the Administrator and Deputy Administrator participated in the "Museum Day Live!" event sponsored by Smithsonian Magazine.
- Administrator Bolden participated in a panel on women in Leadership positions, sponsored by the American Association of University Women on March 30.
- Also in March, Dr. Newman and other NASA leaders attended a Women's History Month event hosted by NASA, in partnership with the White House Council on Women and Girls, which explored the role of women in the fields of science, technology, engineering and math (STEM). The event provided students a glimpse of NASA women in action at NASA Goddard Space Flight Center (GSFC) and featured a panel of speakers that included Dr. Newman; Dr. Ellen Stofan, NASA Chief Scientist; Lesa Roe, NASA Deputy Associate Administrator; and Dr. Ellen Ochoa, Director, Johnson Space Center.
- The Deputy Administrator routinely addressed EO and D&I issues in her blog, including posts during Women's History Month on celebrating women in STEM and female NASA pioneers.
- Other NASA leaders, including Dr. Stofan and Dr. Gale Allen, Deputy Chief Scientist, contributed articles to the NASA Leadership Blog on topics such as encouraging diversity in research.

- NASA Deputy Associate Administrator Lesa Roe represented NASA on the White House Council on Women and Girls.
- In June, the Deputy Administrator spoke at the Engaging Women and Girls in STEM through Data Science event at NASA Headquarters in Washington, which was held as part of the White House's United State of Women Summit.
- In July, Administrator Bolden held a town hall with employees at NASA Headquarters to discuss issues related to racial tensions and race relations.
- In August, several NASA senior officials participated in the NASA MissionSTEM Summit, an event that brought together NASA grantees, employees, and STEM faculty and students to discuss the need for greater diversity in STEM. NASA speakers included: Dr. Newman; Dr. Stofan; Associate Administrator Robert Lightfoot; Associate Administrator for Diversity and Equal Opportunity Brenda Manuel; Associate Administrator for Education Donald James; Associate Administrator for Small Business Programs Glenn Delgado; Associate Administrator for Space Technology Steve Jurczyk; and Acting Chief Technologist Dennis Andrucyk.

Nonetheless, NASA's leaders do not necessarily represent the NASA workforce demographically (see Tables 1 and 2). Although women accounted for nearly 35 percent of the NASA workforce in FY 16, they were only 29 percent of the NASA SES. Further, *there has been little change in the demographics of the SES ranks over the last 20 years, while the demographics of the NASA workforce, overall, have changed*. For example, between FY 96 and FY 16, the percentage of AAPI who were SES remained the same while the percentage of SES who were Black or African American declined somewhat. However, during the same time percentage of employees who were non-White increased. (Additional workforce data findings are discussed under Challenge 2.)

Table 1. NASA SES Employees by Race, Ethnicity, and Gender: FY 96 to FY 16

	AAPI	Black	Hispanic	More than One Race	AIAN	White	Male	Female
FY 96 (n=439)	4.5%	10.5%	4.3%	0.0%	0.8%	79.9%	67.1%	32.9%
FY 01 (n=380)	5.4%	10.7%	4.7%	0.0%	0.9%	78.3%	65.9%	34.1%
FY 06 (n=437)	6.2%	11.5%	5.8%	0.2%	1.1%	75.2%	64.8%	35.2%
FY 11 (n=441)	5.2%	6.3%	4.8%	0.2%	0.2%	83.2%	73.7%	26.3%
FY 16 (n=406)	4.4%	9.6%	4.4%	0.2%	1.0%	80.3%	71.4%	28.6%

Source: Workforce Information Cubes for NASA (WICN) (data as of 10/1/2016).

Table 2. All NASA Employees by Race, Ethnicity, and Gender: FY 96 to FY 16 (including comparison data)[7]

	AAPI	Black	Hispanic	More than One Race	AIAN	White	Male	Female
FY 96 (n=21,700)	4.5%	10.5%	4.3%	0.0%	0.8%	79.9%	67.1%	32.9%
FY 01 (n=19,283)	5.4%	10.7%	4.7%	0.0%	0.9%	78.3%	65.9%	34.1%
FY 06 (n=18,732)	6.2%	11.5%	5.8%	0.2%	1.1%	75.2%	64.8%	35.2%
FY 11 (n=18,916)	6.8%	11.6%	6.5%	0.2%	1.1%	73.8%	64.8%	35.2%
FY 16 (n=17,504)	7.4%	11.7%	7.5%	0.3%	1.1%	72.0%	65.5%	34.5%
Federal STEM Workforce	10.0%	9.4%	5.5%	1.4%	0.9%	72.8%	74.1%	25.9%
U.S. Population, 18+	4.9%	11.7%	14.2%	1.2%	0.7%	67.1%	48.5%	51.5%
U.S. Population	4.7%	12.3%	16.3%	1.8%	0.7%	63.9%	49.2%	50.8%

Sources: WICN (data as of 10/1/2016); U.S. Office of Personnel Management, FedScope, Federal Human Resources Data, Diversity Cube, data as of March 2016 <https://www.fedscope.opm.gov>; U.S. Census Bureau, Population Division, Annual Estimates of the Resident Population by Sex, Age, Race, and Hispanic Origin, June 2016, <http://www.census.gov/popest/data/national/asrh/2015/index.html>.

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[7] Comparison data are provided for illustration only. The Relevant Civilian Labor Force (RCLF) is the preferred comparison, because it is comprised of the occupations similar to Agency occupations. See discussion of the RCLF below.

Strategy 1.2. Centers operationalize the Agency-level plan through Model EEO Center plans. NASA Centers continued to develop and implement their Model Center EEO plans throughout FY 16. Leadership commitment to EEO was demonstrated at all NASA Centers through a variety of ways. For example, at Johnson Space Center (JSC), the Associate Center Director premiered a video to engage all on the importance of the MD-715. At Glenn Research Center (GRC), the GRC Center Director met with each advisory group at least once during the year to listen to concerns and provide a mechanism for issues of concern to be addressed. Wallops Flight Facility (WFF) offers a periodic "Coffee with the Director" series, in which employees can have informal dialogue with Wallops' Facility Director.

CHALLENGE 2. PROACTIVE PREVENTION OF DISCRIMINATORY ACTIONS

NASA will advance EEO in hiring, promotions, leadership development, and awards, to provide work environments that honor the values of excellence, inclusion, teamwork, and safety.

Strategy 2.1. Outreach and recruitment activities for underrepresented groups in science and engineering occupations. Certain groups continue to be underrepresented in mission critical occupations at NASA. Each year, NASA reviews its "mission critical" occupations, including AST Engineering and Physical Science positions. Between FY 96 and FY 16, NASA increased the percentage of employees who are AAPI, Black, and Hispanic in AST Engineering positions, as well as the percentage who are female (see Table 3). However, *AAPI AST Engineers continue to be employed in the NASA workforce at lower rates than in the RCLF.*[8] In fact, these employees are also employed at lower rates than their representation among recent college graduates. Women, on the other hand, are employed as NASA AST Engineers at double the rate they were in the RCLF (22 percent compared to 11 percent). Further, despite some gains in representation since FY 96, *all minorities and women are underrepresented in NASA AST Physical Scientist positions* in comparison to the RCLF (see Table 4). This suggests that NASA needs to do a better job, in part through more strategic action as identified in this Plan, at targeted recruiting for its positions, particularly Physical Scientist positions.

Table 3. NASA AST Engineers by Race, Ethnicity, and Gender: FY 96 to FY 16

	AAPI	Black	Hispanic	More than One Race	AIAN	White	Male	Female
FY 96 (n=10,529)	5.9%	5.4%	4.4%	0.0%	0.6%	83.8%	83.3%	16.7%
FY 01 (n=9,443)	7.1%	6.0%	4.7%	0.0%	0.6%	81.7%	81.4%	18.6%
FY 06 (n=9,551)	7.7%	6.4%	6.1%	0.1%	1.0%	78.6%	79.0%	21.0%
FY 11 (n=10,229)	8.3%	6.4%	6.8%	0.1%	1.0%	77.4%	78.1%	21.9%
FY 16 (n=9,719)	8.6%	6.6%	7.4%	0.2%	1.0%	76.3%	77.5%	22.5%
2010 RCLF[9]	*11.8%*	*4.8%*	*5.2%*	*0.4%*	*0.6%*	*77.2%*	*88.8%*	*11.2%*
2013 Graduates[10]	*16.8%*	*5.2%*	*8.3%*	*7.8%*	*0.4%*	*61.5%*	*80.0%*	*20.0%*

[8] EEOC requires agencies to compare their workforce demographic data to the RCLF, that is, the occupations in the civilian labor force that are directly comparable to the occupations in the Agency's the labor force. EEOC, Management Directive 715, accessed at <https://www.eeoc.gov/federal/directives/md715.cfm>; U.S. Census Bureau, "Frequently Asked Questions – EEO Tabulation 2006-2010," accessed at <https://www.census.gov/people/eeotabulation/about/faq5year.html#Q16>. The RCLF was calculated according to the EEOC guidance, *Technical Assistance for Federal Agencies in Using the 2006-2010 American Community Survey [ACS] Equal Employment Opportunity Tabulation,* using the U.S Census Bureau EEO Tabulation from the 2006-2010 ACS (data set EEO-CIT02R).

[9] For comparison to the NASA AST Engineer workforce, the RCLF includes occupations equivalent to the following occupational series: Aerospace (0861), Electrical (0850), Computer (0854), Electronics (0855), and General (0801) Engineers.

[10] Data for college graduates are provided for comparison only. These data include all earned Bachelor's, Master's, and Doctoral degrees in Aerospace, Electrical, and Other Engineering in 2013 (the most recent year for which data are available). National Science

Table 4. NASA AST Physical Scientists by Race, Ethnicity, and Gender: FY 96 to FY 16

	AAPI	Black	Hispanic	More than One Race	AIAN	White	Male	Female
FY 96 (n=1,084)	6.4%	2.6%	1.4%	0.0%	0.3%	89.4%	86.9%	13.1%
FY 01 (n=1,021)	7.7%	3.2%	1.7%	0.0%	0.4%	87.0%	83.7%	16.3%
FY 06 (n=948)	7.8%	3.0%	3.2%	0.0%	0.5%	85.5%	81.1%	18.9%
FY 11 (n=950)	8.4%	3.3%	3.7%	0.0%	0.2%	84.4%	76.2%	23.8%
FY 16 (n=898)	9.2%	2.7%	4.0%	0.0%	0.1%	84.0%	75.7%	24.3%
2010 RCLF[11]	14.4%	3.5%	4.3%	0.5%	0.6%	76.7%	62.6%	37.3%
2013 Graduates[12]	6.9%	3.0%	6.6%	8.2%	0.5%	74.8%	76.1%	23.9%

Sources (Tables 3 and 4): WICN (data as of 10/1/2016); U.S Census Bureau EEO Tabulation from the 2006-2010 American Community Survey (data set EEO-CIT02R); National Science Foundation, *Science and Engineering Indicators 2016*. Percentages highlighted in red indicate a group whose employment at NASA is below the RCLF.

In FY 16, NASA sought to assist with outreach to diverse STEM communities through participation in conferences of STEM-related professional societies. NASA ODEO coordinated with OHCM, the Office of Education, and Center EO offices to support NASA participation in conferences of professional societies. Conference support included participation in recruitment events, organizing panels and sessions, and providing information on NASA programs. Conferences were selected based on longstanding NASA relationships with organizations as well as the target audience for the conference (see Table 5). Center EO, HR, and Education offices participated in these and other conferences, including the Mexican American Engineers and Scientists (MAES) Symposium and career fairs at minority-serving schools and institutions of higher education, such as Alabama A&M University, Hampton University, Howard University, Navajo Technical College, Texas A&M University, Tuskegee University, and the University of Puerto Rico. Other targeted outreach included the following:

- Staff from Armstrong Flight Research Center (AFRC) attended the Tribal College University Program (TCUP) Research Symposium in August 2016.
- The Native American Advisory Council at Ames Research Center (ARC) participated in outreach to the Choctaw Nation through its Choctaw Nation STEM Camp event in July. The one-day event, focused on Astrobiology and Space Science, was attended by 28 participants.
- GRC staff visited the Southwestern Indian Polytechnic Institute (SIPI) in Albuquerque, New Mexico, and the Jemez Pueblo nation in September 2016. Staff provided a 3-Day "NASA STEM Day" event to expand the region's interest in STEM and to build relationships with the SIPI by meeting with faculty and institute leaders to provide NASA managers insight into the institutions' technologies and to promote recruitment.
- GSFC's Asian Pacific American Advisory Committee collaborated with the Society of Asian Scientists and Engineers to offer discussions on student employment opportunities through Pathways internships and educational internships.

Foundation (NSF), *Science and Engineering Indicators 2016*, accessed at <http://www.nsf.gov/statistics/2016/nsb20161/#/data>. In these data, "Multicultural" also includes "other races" and "unspecified" and, thus, is not comparable to the other data sources.

[11] For comparison to the NASA AST Physical Scientist workforce, the RCLF includes all occupations that are equivalent to the following occupations: Physical Scientists (1301), Physicists (1310), and Space Scientists (1330).

[12] Data for college graduates are provided for comparison only. These data include all earned Bachelor's, Master's, and Doctoral degrees in Astronomy, Physics, Atmospheric Sciences, and Other Physical Sciences in 2013 (the most recent year for which data are available). NSF, *Science and Engineering Indicators 2016*, accessed at <http://www.nsf.gov/statistics/2016/nsb20161/#/data>. In these data, "Multicultural" also includes "other races" and "unspecified" and, thus, is not comparable to the other data sources.

- JSC supported several outreach events such as the Essence Festival, Pride Festival, and Mexico's National Week of Science and Technology.
- Langley Research Center (LaRC) extended its outreach to additional minority-serving institutions (MSIs), such as New Mexico Tech, Sitting Bull College, and University of Texas at El Paso.
- Senior leadership at Marshall Space Flight Center (MSFC) attended the annual Conference on Asian Pacific American Leadership in 2015 leading to the placement of MSFC job notices on their Web site in FY 16. In addition, through relationship building, the Federal Asian Pacific American Conference (FAPAC) is now considering Huntsville, Alabama, to host a future FAPAC conference and because of this relationship, an Asian American was hired at the Center.
- GRC's Office of Education made a strategic commitment to attracting and placing top science and engineering talent from MSIs across the United States in the GRC summer internship program. To achieve this goal, Education staff developed a multi-faceted recruitment strategy; due to limited travel funding this recruitment strategy was primarily executed through virtual means. Nonetheless, as a result, GRC received applications from over 500 MSI students (compared to the 1,100 applications from MSIs for all Centers combined in FY 15).

Table 5. Outreach and Recruitment at Professional Conferences: FY 16

Target Audience	Conference Name	ODEO Support
American Indians and Alaska Natives (AIAN)	American Indian Science and Engineering Society (AISES)	$5,000
Asian Americans and Pacific Islanders	Federal Asian Pacific American Council (FAPAC)	$10,000
	Society of Asian Scientists and Engineers (SASE)	$5,000
Blacks and African Americans	Black Engineer of the Year Award (BEYA) Global Competitiveness Conference	$10,000
	Congressional Black Caucus	$10,000
	National Society of Black Engineers (NSBE)	$10,000
	NSBE Aerospace Systems Conference	$8,000
Hispanics and Latinos	Great Minds in STEM Hispanic Engineer National Achievement Awards Corporation (HENAAC)	$10,000
	National Council of La Raza *(*NCLR)	$5,000
	Society of Hispanic Professional Engineers (SHPE)	$5,000
Hispanics and Latinos and AIAN	Society for Advancement of Chicanos/Hispanics and Native Americans in Science (SACNAS)	$5,000
Lesbian, Gay, Bisexual, and Transgender Individuals	Out and Equal	$10,000
Women	Society of Women Engineers (SWE)	$10,500
	Women of Color (WOC) STEM Conference	$10,500

Source: Internal NASA ODEO data.

Applicant flow data suggest that applications from groups underrepresented in NASA's workforce have increased somewhat, although the role played by recruitment and outreach efforts is unclear and additional analysis is necessary. Comparing FY 11 to FY 16 (see Figure 1):[13]

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[13] FY 11 was chosen as the point of comparison to FY 16 simply because it was five years prior to the most recent data. Trend data over several years was not readily available.

- The percentage of **applicants** for Physical Scientist positions who were Hispanic and Black was slightly higher in FY 16 than in FY 11. Hispanics accounted for 9 percent of applicants in FY 11 and 11 percent in FY 16; Blacks accounted for 7 percent and 11 percent, respectively.
- The percentage of applicants that were **referred** to hiring officials who were AAPI, Hispanic, and Black was higher in FY 16 than in FY 11.
- The percentage of applicants **selected** for positions who were Hispanic and Black was higher in FY 16; however, the percentage selected who were AAPI was lower.
- In both years, *the percentage of White applicants who were hired was greater than their representation among those referred and those who applied*. For example, in FY 16 Whites were 61 percent of the applicant pool, 64 percent of those referred, and 76 percent of those hired.

Similar trends in applications and referrals occurred for Aerospace Engineer positions (see Figure 2). The percentage of applicants who were AAPI, Hispanic, and Black was higher in FY 16, compared to FY 11, as was the percentage of referred applicants who were Hispanic. However, the percentage of applicants selected for positions who were AAPI was the same in FY 11 and FY 16, the percentage who were Black was lower in FY 16, and the percentage of applicants selected who were Hispanic was higher in FY 16. As with the Physical Scientist positions, in FY 16 Whites accounted for: 61 percent of the applicant pool for Aerospace Engineer positions, 67 percent of those referred, and 75 percent of those hired.

Figure 1. Applicants for NASA Physical Scientist Positions (1301), by Race and Ethnicity: FY 11 and FY 16
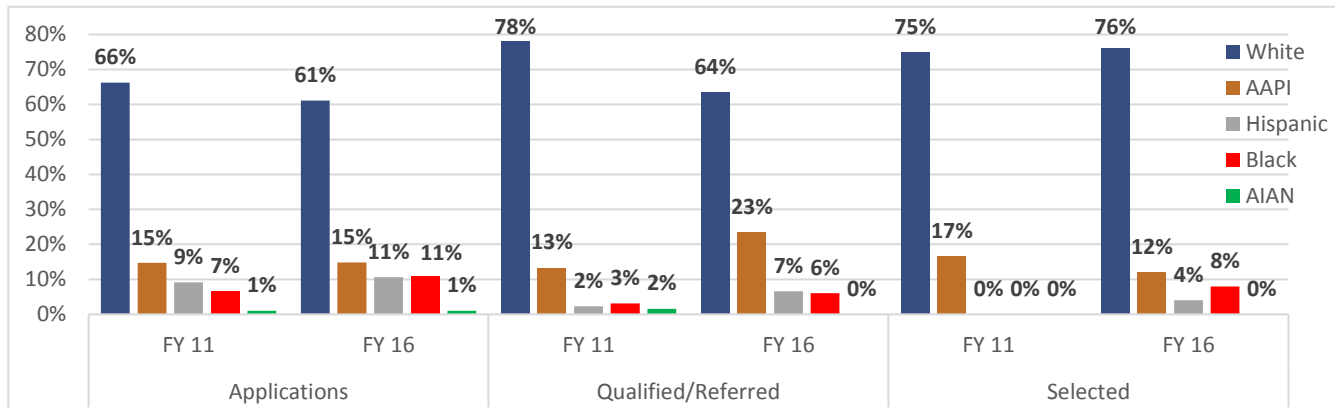
Source: WICN (data as of 10/1/2016). In FY 11, 736 individuals applied, 128 were referred, and 12 were selected; in FY 16, 1,985 applied, 167 were referred, and 25 were selected.

Figure 2. Applicants for NASA Aerospace Engineer Positions (0861), by Race and Ethnicity: FY 11 and FY 16
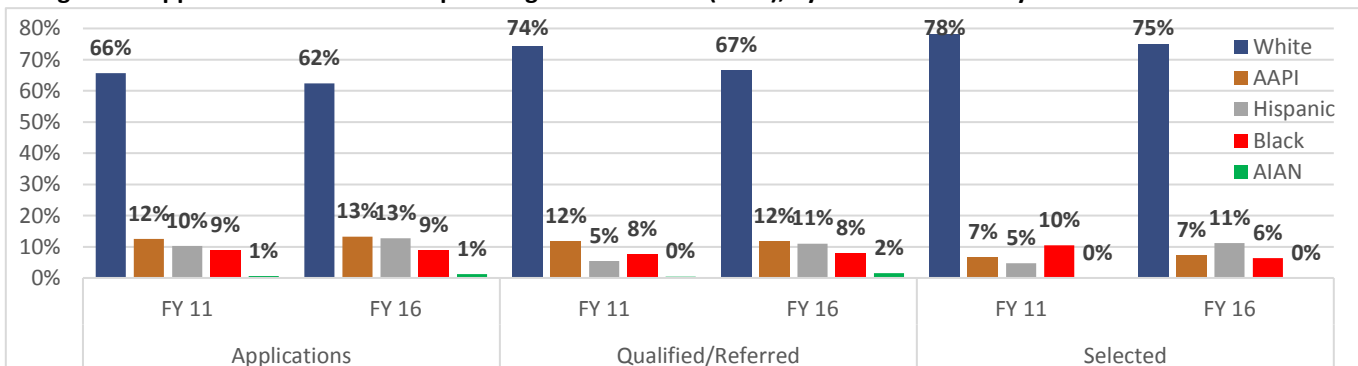
Source: WICN (data as of 10/1/2016). In FY 11, 4,055 individuals applied, 550 were referred, and 105 were selected; in FY 16, 11, 402 applied, 1,268 were referred, and 251 were selected.

Strategy 2.2. Recruit and retain individuals with targeted disabilities (including disabled veterans) in all NASA occupational categories. Between 2011 and 2016, NASA increased the percentage of its workforce who are IWD (employees with targeted or non-targeted disabilities) from 6 to 7 percent, achieving the Government-wide goal of 7 percent of the workforce being IWD largely through recent hiring efforts. In the past 20 years, NASA has doubled the percentage of new hires who were IWD from 6.5 to 13 percent. The percentage of new hires who are IWTD also has doubled from 1 to 2 percent (see Figure 3). However, *NASA has not achieved the Federal goal of 2 percent of the workforce being IWTD.* All but one Center is below the Federal hiring goal of 2 percent (see Figure 4).

Figure 3. New Hires of IWD and IWTD: FY 96 to FY 16

New Hires of Individuals with Disabilities and IWTD, FY 96 - FY 16
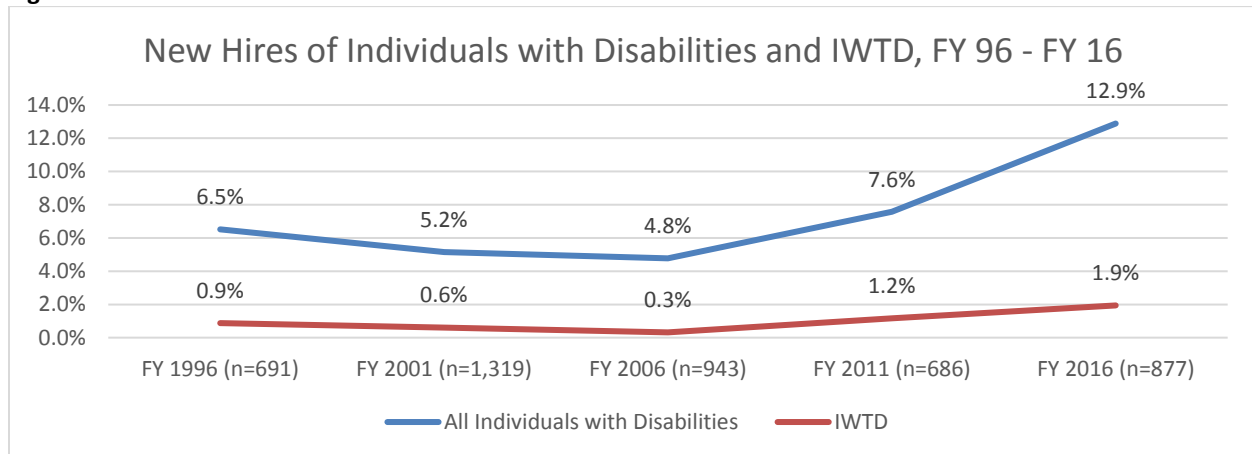
Source: WICN (data as of 10/1/2016); "n" represents the total number of new hires in each year.

Figure 4. IWTD by NASA Center: FY 16
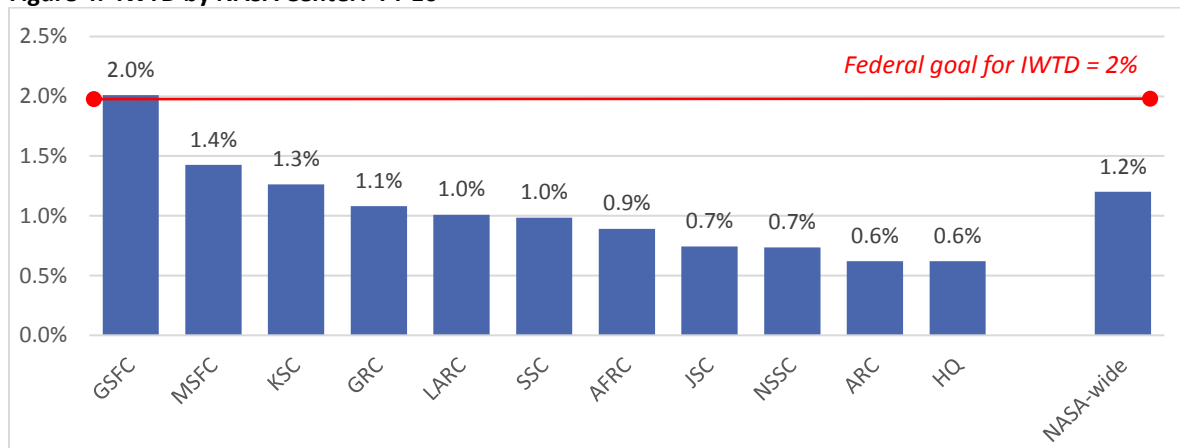
Source: WICN (data as of 10/1/2016).

Despite the increase in the percentage of employees who are IWD, these individuals are employed primarily in clerical positions. In FY 16, 17 percent of employees in clerical positions were individuals with disabilities, compared to 5 percent of employees in Science and Engineering (S&E) positions. In fact, *in the past 20 years, the percentage of S&E positions occupied by IWD has increased only 1 percentage point while the perecentage of clerical positions occupied by IWD has doubled* (see Figure 5).

Figure 5. Percentage of Occupation That Are IWD: FY 96 - FY 16
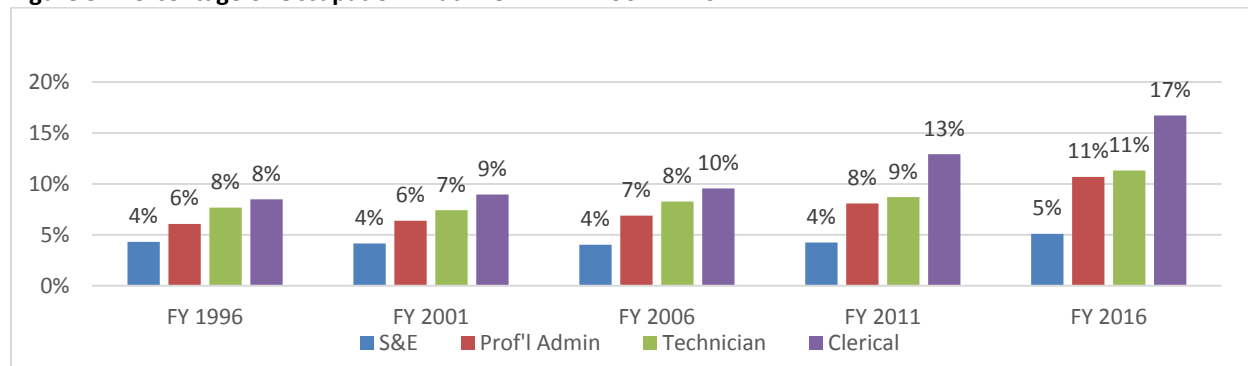
Source: WICN (data as of 10/1/2016).

In addition, ***individuals with targeted and non-targeted disabilities leave the Agency at higher rates than their workforce representation rates*** (see Figure 6). Between FY 12 and FY 16, while the percentage of the workforce who were IWTD remained at 1.1 percent, the percentage of individuals who quit, were terminated, or transferred to another agency who were IWTD increased from 4.7 to 11.1 percent. (Agency separation rates are low overall: about 2 percent of employees quit, are terminated, or transfer to another agency each year.)

**Figure 6. Separation Rates by Disability Status: FY 12 - FY 16**
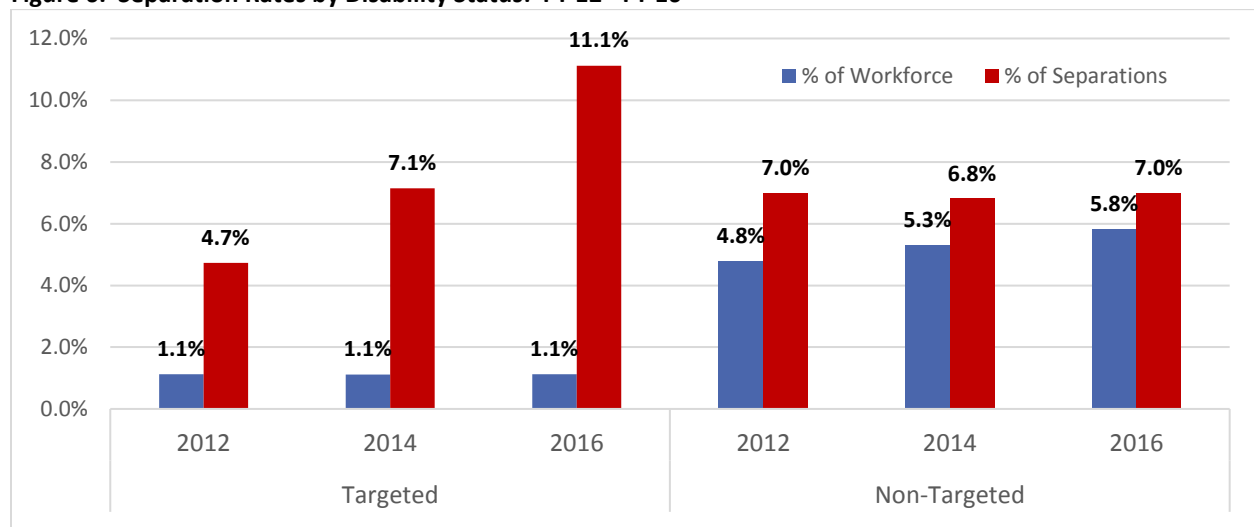
Source: WICN (data as of 10/1/2016). Separations include all reasons other than retirement or death.

Center EO offices have partnered with other Center organizations to develop strategies to address the recruitment, hiring, and retention of IWD. In FY 16, the MSFC EO and HR offices established partnerships with the Alabama and Tennessee Departments of Vocational Rehabilitation and colleges and universities to identify and increase hires of Schedule A candidates. At Kennedy Space Center (KSC), the Disability Program Manager accompanied the Pathways Program Manager to recruit IWD at the annual Family Café Employment Expo supported by the Florida Governor's office. The KSC HR office also established a new working group focused on IWD and IWTD to address recruitment and retention called Respecting Inclusion (and) Supporting Employees (RISE).

Strategy 2.3. Take steps to ensure equal opportunity in promotions, performance ratings, awards (performance and honorary), and leadership development programs. ODEO and Center EO offices continue to monitor demographic data on promotions, performance ratings, awards, and leadership development programs. EO staff either served on selection boards for development programs or revised final selections. This work is ongoing and will be carried over to the FY 17-19 Model EEO Agency Plan.

For NASA as a whole, the total distribution of awards resembles the demographics of the workforce; yet individual awards vary in their demographic distribution (see Figure 7). For example, in FY 16, Whites made up 72 percent of the NASA workforce but accounted for 78 percent of Honor Awards received; Blacks accounted for 11 percent of the workforce but received about 8 percent of Honor Awards.

Figure 7. Agency Awards by Race and Ethnicity: FY 16
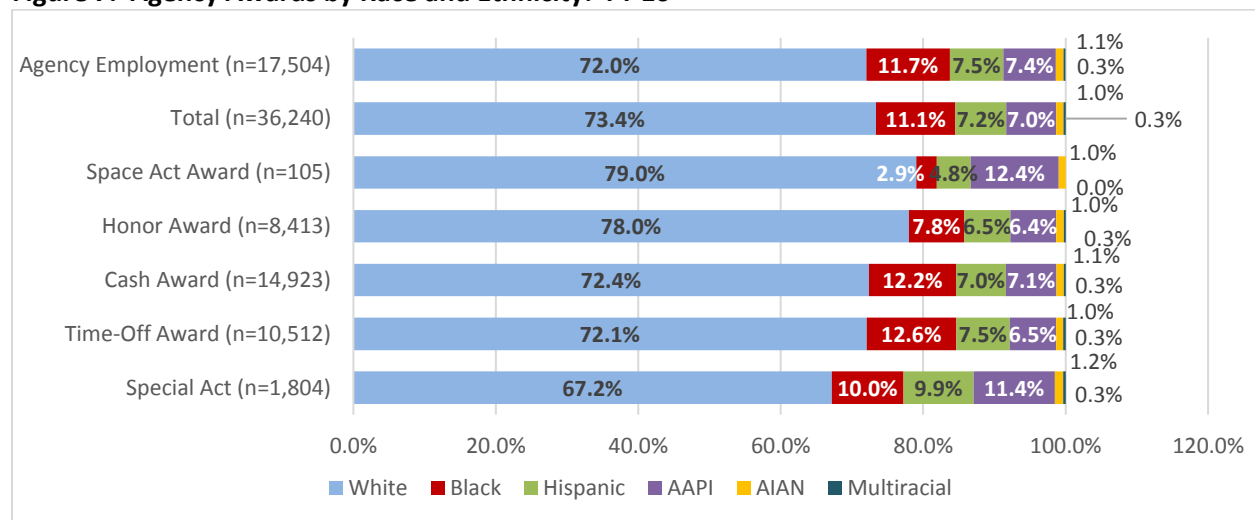
Source: WICN (data as of 10/1/2016).

NASA made inconsistent progress in the diversity of promotions to GS-13, GS-14, and GS-15, by race, ethnicity, and gender. When analyzing promotions in various occupations, there are differences between certain groups' representation in the pool of employees at the next lower grade level and the percentage promoted. For example, in FY 16 Black employees accounted for 8 percent of the GS-13's in AST positions, but were only 3 percent of the AST employees promoted to GS-14 positions (see Table 6). Similarly, Blacks are promoted to GS-13, GS-14, and GS-15 Professional Administrative positions at rates lower than their representation in GS-12, GS-13, and GS-14 positions (see Table 7). Women were 61 percent of GS-13's in Professional Administrative positions, but only 49 percent of those promoted to GS-14.

Table 6. Promotions in AST Positions: FY 16

AST Promotions		White	Black	Hispanic	AAPI	AIAN	Multi-racial	Male	Female
GS 13	Pool (n=319)	69%	9%	10%	12%	0.3%	0.0%	71%	29%
	Promoted (n=167)	68%	8%	11%	13%	0.6%	0.0%	71%	29%
GS 14	Pool (n=2,927)	73%	8%	8%	10%	1.0%	0.2%	74%	26%
	Promoted (n=308)	80%	**3%**	10%	**6%**	0.6%	0.3%	71%	29%
GS 15	Pool (n=3,167)	79%	6%	6%	8%	1.2%	0.1%	78%	22%
	Promoted (n=209)	80%	9%	6%	**4%**	1.0%	0.0%	74%	26%

Table 7. Promotions in Professional Administrative Positions: FY 16

		White	Black	Hispanic	AAPI	AIAN	Multi-racial	Male	Female
GS 13	Pool (n=899)	59%	27%	8%	5%	1.2%	0.2%	33%	67%
	Promoted (n=146)	58%	**21%**	14%	7%	0.7%	0.0%	40%	**60%**
GS 14	Pool (n=1,631)	63%	22%	7%	5%	1.5%	0.4%	39%	61%
	Promoted (n=107)	64%	**17%**	10%	6%	2.8%	0.0%	51%	**49%**
GS 15	Pool (n=1,176)	67%	20%	6%	5%	1.0%	0.4%	46%	54%
	Promoted (n=65)	72%	**17%**	3%	6%	1.5%	0.0%	**40%**	60%

Source (Tables 6 and 7): WICN (data as of 10/1/2016). Numbers in red indicate areas where the percentage of promotions is lower than the percentage of individuals in the available pool (i.e., individuals at the next grade down).

Strategy 2.4. Better utilize the SEPs to proactively prevent discrimination. In FY 16, NASA ODEO finalized its SEPM guidance and conducted a briefing on the guidance for Center EO and Diversity Managers. In August, ODEO requested Center EO offices to complete the SEPM self-evaluation checklist that was developed in conjunction with the guidance. Completed checklists were used to guide the development of the FY 17-19 Model EEO Agency Plan and to guide the work of the Agency special emphasis program managers. The information provided suggested the need for ODEO to assist Center SEPMs in: coordinating with OHCM and the Office of Education on planning outreach and recruitment events, ensuring broad dissemination of vacancy announcements, and measuring the return on investment for outreach and recruitment efforts.

At the Center level, along with the ongoing work of SEPMs and employee resource groups (ERGs), at least one new ERG was established. The Women Inspiring Stennis Excellence (WISE) ERG was created to leverage the unique perspectives of all women at Stennis Space Center (SSC). Monthly WISE meetings will feature a new topic each month to address various issues women face professionally and personally. Participants will receive credit for training. In addition, AFRC appointed all collateral duty SEPMs in April 2016; they are allocated 10 percent of their time to work on SEPM activities.

Strategy 2.5. Continue education and awareness efforts, such as the Conflict Management Program and the ODEO Information Resource Guide. ODEO continued to disseminate EO and diversity information in a variety of ways, including posting the Administrator's EEO and Anti-Harassment Policy Statements on the ODEO Web site, publishing a quarterly newsletter, *Endeavor*, and updating brochures describing ODEO programs. In addition, the ODEO Conflict Management Program sponsored 21 instructor-led conflict management classes at eight NASA Centers, as well as 8 webinars covering the following topics: Trust Building, Effective Communication, Handling Difficult Emotional Situations, and Performance Expectations. In FY 16, ODEO offered 8 webinars to the entire Agency workforce. Individual conflict consultations with a trained professional were offered for employees and management officials on a voluntary basis. In many instances, the private consultations are used to prevent disputes or escalation of disputes that may lead to EEO complaints or grievances. Web-based Conflict Management Refresher Training also was utilized Agency wide. This training provides follow-on to the Basic Conflict Management classroom training and reviews the core concepts of conflict prevention, management, and resolution.

CHALLENGE 3. INTEGRATION OF EEO INTO THE AGENCY STRATEGIC MISSION

EEO will be viewed as a fundamental part of the NASA mission and critical to strategic planning and key workforce decision making.

Strategy 3.1. Include EEO performance in the Agency Strategic Plan. ODEO reported FY 16 EEO performance to the NASA Office of the Chief Financial Officer for inclusion in the Agency's annual financial performance reports to the Office of Management and Budget (OMB), pursuant to the Government Performance and Results Modernization Act. NASA's EO and diversity goals are included in the Agency's 2014-2018 Strategic Plan in Objective 3.1: "Attract and advance a highly skilled, competent, and diverse workforce, cultivate an innovative work environment, and provide the facilities, tools, and services needed to conduct NASA's missions." For the NASA Strategic Plan annual performance indicator relating to EEO for FY 16, ODEO stated that it would sustain three programs and processes designed to proactively prevent discrimination, as outlined in the Model EEO Agency Plan: (1) ADR in the EEO complaints process, (2) Agency Anti-Harassment Program, and (3) reasonable accommodations for IWD. (Performance data and accomplishments for these areas are reported below under strategies 5.2, 6.2, and 6.3.)

This was mirrored at the Center level. For example, at ARC, the EEO Director was part of the strategic planning team for the Center tasked to update Armstrong's Strategic Plan. The new plan focuses on people first and then the projects and programs. The EEO Director is part of the team looking at a reorganization of the Center.

Strategy 3.2. Communicate EEO concerns, priorities, and performance indicators to the Administrator and other Agency leadership on a regular basis. The AA, ODEO, met monthly and on an as needed basis with the NASA Administrator to keep him apprised of priority EO concerns and efforts, such as the Anti-Harassment Program, MD-715 reporting, recruitment efforts, EO technical guidance for NASA grant recipients, complaints management, and employee concerns. The AA, ODEO, also participated in meetings held by the Deputy Associate Administrator regarding initiatives of the White House Council on Women and Girls.

As in previous years, in FY 16 NASA ODEO reported quarterly on EO and D&I performance outcomes at meetings of the Baseline Performance Review (BPR) and at the annual "State of EEO" briefing on May 23. Several Centers conducted their own "State of EEO" briefings in FY 16 and/or provided Center organizations information on EEO trends in their organizations and recommended actions to address areas of concern. In addition, ODEO conducted a three-day technical assistance and information sharing meeting for Center EO Directors and Diversity managers in May.

Strategy 3.3. Consider EEO in Agency deliberations prior to decisions regarding recruitment strategies, succession planning, and other workforce policies and plans that may impact EEO progress directly or indirectly. The AA, ODEO, continued her work as member of the Strategic Management Council (SMC), the Agency's senior decision-making body for strategic direction and planning. The SMC determines NASA strategic direction, assesses Agency progress toward achieving NASA's vision, and serves as a forum for the review and discussion of issues affecting Agency management. In addition to monthly meetings with the NASA Administrator, the AA, ODEO, also met regularly with the AA for Human Capital Management to discuss collaborative programmatic strategies, for example, in the areas of performance management, separations, and the Agency's Diversity and Inclusion Strategic Partnership. Similarly, Center EO offices met regularly with Center leadership in meetings such as the BPR, State of EEO briefings, and other regular and as needed meetings.

CHALLENGE 4. MANAGEMENT AND PROGRAM ACCOUNTABILITY

NASA managers and supervisors will be held accountable for advancing EEO to better ensure healthy work environments in which fairness and equity can thrive.

Strategy 4.1. Rate managers and supervisors on EEO performance as part of their annual performance appraisals. Changes were implemented in supervisors and managers' performance plans in FY 13 and later, and NASA continues to provide guidance on these changes. There continues to be a need to develop better performance measurements in this area. An action to address this has been included in the FY 17-19 EEO Plan.

Strategy 4.2. Evaluate EEO operations through onsite functional reviews of NASA Centers. ODEO continued its onsite Functional Review Program, the purpose of which is to assess the effectiveness of EEO efforts for the NASA workforce, as well as EO in NASA-conducted programs at the operational level. Major programmatic updates in FY 16 included the development of a streamlined EO Function Review Reporting format designed to ensure efficient and effectiveness in capturing observations, recommendations, corrective actions, and promising practices. Additionally, the new format is intended to help Centers to prioritize findings and focus resources needs. The FY 16 review was conducted at KSC.

CHALLENGE 5. EFFICIENCY OF EEO OPERATIONS

NASA will improve EEO delivery through more efficient systems and processes designed to address EEO matters in a timely and effective manner.

Strategy 5.1. Improve the Agency's timeliness and consistency in providing reasonable accommodations to qualified individuals with disabilities. To ensure consistency and efficiency in the implementation of NASA's new Reasonable Accommodations Procedures, issued in FY 15, the Agency deployed training on these procedures to the NASA EO, HR, and legal communities. ODEO trained almost half of its management and supervisory workforce on these procedures to promote disability awareness and increase this community's comfort, confidence, and competence in managing employees with disabilities. In addition, ODEO continued to identify and implement process and system adjustments to the Reasonable Accommodation Management System.

Strategy 5.2. Encourage ADR and earlier settlement of discrimination complaints. ODEO has expanded its efforts to actively advocate for the use of alternative dispute resolution (ADR) to resolve complaints. As a result, there has been significant improvement in ADR offer and participation rates:

- At the informal stage, from FY 15 to FY 16, the offer rate increased from 38 to 50 percent of all informal complaints. The participation rate at the informal stage increased from 19 to 51 percent of all complaints receiving offers of ADR.
- At the formal stage, ODEO has promoted ADR as an asset for effective management and an essential catalyst to resolve workplace conflicts, eliminate poor morale, and thereby enhance mission success. As a result, NASA's offer rate at the formal stage increased from 13 to 40 percent between FY 15 and FY 16. Moreover, the participation rate in FY 16 soared to 72 percent, a substantial increase from 3 percent in FY 15.

- In FY 16, the average processing days for complaints that are resolved through ADR was 50 days, while those processed without ADR was 484 days. This demonstrates the need to continue to utilize ADR in the interest of greater efficiency and cost effectiveness in addressing potential discrimination issues quickly.

These efforts show that the use of ADR in EEO is highly effective in quickly and effectively addressing EEO issues. In addition, ODEO developed enhanced training and informational brochures for managers and supervisors to reinforce knowledge and awareness of ADR and its benefits. ODEO also updated the Agency-wide ADR procedural guidance (NPR 3713.2A) to conform to changes in the EEOC MD-110 (issued August 15, 2015) and bolster ADR activity as a matter of Agency-wide policy and procedure. To continue to maximize the use and benefits of ADR, NASA plans to institute a new Agency-wide requirement that ADR be utilized to the maximum extent practicable in EEO cases.

ODEO collaborated with all NASA Centers and other of its partners to conduct its third annual Agency-wide Conflict Awareness Month observations. Conflict Awareness Month activities took place at each Center and Headquarters. The observations emphasized ADR and other proactive means of addressing conflicts, grievances, and complaints. This is the second year ODEO facilitated the release of the Administrator's video message highlighting the Agency's continuing efforts to fully engage employees in creating a positive work environment, open lines of communication, and early conflict resolution. The observance was conducted in partnership with OHCM, the Ombuds Program, and the Safety and Mission Assurance Directorate.

Strategy 5.3. Streamline processing of discrimination complaints (e.g., investigations and final Agency decisions (FADs)) to meet regulatory timeframes. ODEO continued its work to meet regulatory timeframes for processing discrimination complaints. Accomplishments include:

- Instituting an E-File Initiative and conducting a rollout of NASA's first ever Agency-wide database that allows Agency employees to file formal complaints of discrimination electronically.
- Enhancing the NASA Policy Directive Designation of Authority (NPD 3713.6Q) for EEO Complaints to adhere with requirements of MD-110. Enhancements also clarify roles and responsibilities throughout the EEO process involving both individual and class complaints of discrimination.
- Conducting an Agency-wide in-house EEO Counselor 8-Hour Refresher Training webinar and quarterly meetings with EEO Directors to provide EEO complaints data analyses for ADR and discrimination complaints activity.
- Processing one NASA Assisted and Conducted Activity complaint of discriminatory treatment addressing a failure to accommodate a museum patron directed at a museum that received NASA funds. Through ODEO's intervention, the matter was eventually resolved between the museum and the patron. Also oversaw inquiry into complaint of sexual harassment and systemic discrimination based on gender at an institution that receives NASA research funds.
- Timely Quarterly Agency-wide posting of EEO complaint data and statistics on NASA Web sites as required by EEOC Regulations and the No FEAR Act.
- Timely Annual 462 Report to EEOC.

Nonetheless, *NASA has been challenged in meeting regulatory timeframes for complaints processing*. Due to a hiring freeze, the Complaints Management Division in ODEO has been unable to replace experienced EEO specialists who have left the Agency. This has impacted processing times for various aspects of the complaints process, including investigations and adjudications.

CHALLENGE 6. RESPONSIVENESS AND LEGAL COMPLIANCE

NASA will be in compliance with EEO statutes, EEOC regulations and guidance, and with its own Policy Directives and Procedural Requirements to ensure legal compliance.

Strategy 6.1. Ensure Agency reasonable accommodation procedures meet EEOC guidelines. In FY 16, ODEO offered mandatory training on disability-related issues to supervisors and managers, including facts to overcome stereotypes about people with targeted disabilities, detailed instructions on special hiring authorities, and reasonable accommodations procedures. Pursuant to the updated NASA reasonable accommodation procedures (issued in March 2015), in FY 16, Centers established Reasonable Accommodation Working Teams comprised of the Center Disability Program Manager, the Office of Human Capital, and the Chief Counsel's Office, as well as select members of management and other stakeholders as deemed appropriate based on the specific case to ensure the timely and effective provision of accommodations.

In addition, ODEO requested that Centers report on the number of reasonable accommodations requested, approved, and denied, as well as additional information such as: reasons for denial, average days to process, and sources of technical assistance consulted. ODEO reviewed the information submitted and continues to work on streamlining the reporting process required under the new procedures.

Strategy 6.2. Implement requirements of the Notification and Federal Employee Antidiscrimination and Retaliation (No FEAR) Act of 2002. ODEO submitted the annual No FEAR Act report to the NASA Office of Legislative and Intergovernmental Affairs on March 26, 2016, for dissemination to the Congress, EEOC, the Office of Personnel Management, and the Office of Management and Budget. (Training for the No FEAR Act was not required in FY 16 and will be deployed in FY 17.)
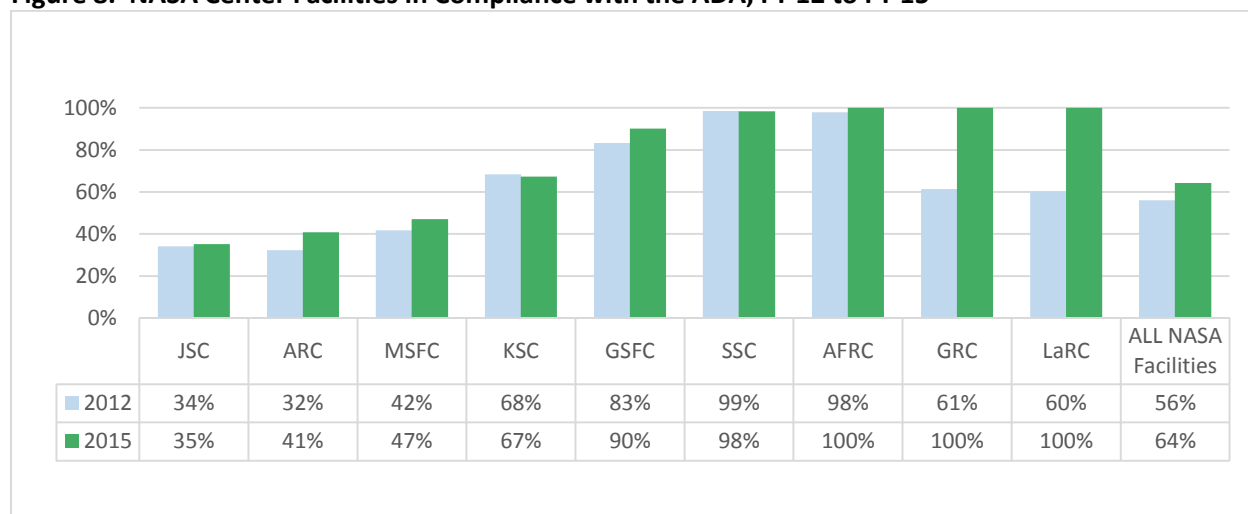
Strategy 6.3. Continue to enhance the Agency's Anti-Harassment Program (AHP) to ensure it comports with EEOC guidance. NASA has continued to vigorously administer its AHP. Under the AHP, the Agency kept processing times to an average of 44 days, which is very low compared with EEO complaint processing times (without ADR). In addition, harassment allegations were sustained in 8 percent of cases, while action was taken to address the matter even in the absence of a finding of a policy violation in 45 percent of cases. This reflects the AHP's effectiveness in helping NASA to address inappropriate behavior before it reaches the level of harassing conduct under Agency policy or the law. NASA also provided face-to-face anti-harassment training to managers, supervisors, and employees at 11 Agency facilities in FY 16, as part of its strong commitment to harassment-free workplaces for its employees. ODEO is developing new guidance for the Centers specifically focusing on new and emerging issues, such as cases involving contractors as parties, the role of labor, and maintenance of an appropriate firewall between the EEO complaints process and the AHP.

Strategy 6.4. Continue to upgrade NASA facilities to ensure compliance with Federal law and accessibility for IWD. Between FY 12 and FY 15, NASA increased the percentage of buildings that are compliant with the ADA from 56 percent to 64 percent (see Figure 8). While great strides have been made at some NASA Centers (through improvements to facilities or demolition of older facilities), other Centers have not had the resources to comply.[14]

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[14] "All NASA Facilities" in figure above includes all NASA Centers and other facilities, such as the Jet Propulsion Laboratory in California and Plum Brook Station in Ohio. However, such facilities are not included in the individual Center totals in the figure.

Figure 8. NASA Center Facilities in Compliance with the ADA, FY 12 to FY 15

	JSC	ARC	MSFC	KSC	GSFC	SSC	AFRC	GRC	LaRC	ALL NASA Facilities
2012	34%	32%	42%	68%	83%	99%	98%	61%	60%	56%
2015	35%	41%	47%	67%	90%	98%	100%	100%	100%	64%

Source: NASA Facilities Engineering Division

In addition, in FY 16, NASA's Chief Information Officer identified an Agency Section 508 Coordinator to manage and oversee the Agency's Section 508 program. Responsibilities of this position include: developing and maintaining Agency policies and guidebooks; disseminating best practices; providing consultation to, or participating in, Agency capital planning and/or business case development and IT governance to ensure NASA appropriately considers Section 508 across the information technology and acquisition life cycles; and partnering with other Section 508 Coordinators throughout the Agency to assist in meeting Section 508 goals and objectives. This position had been dormant at the Agency level for over seven years and represented a true gap in this arena.

Appendix. Status of NASA Model EEO Agency Plan: FY 14-16

Challenge 1. Demonstrated Leadership Commitment: NASA leadership demonstrates its commitment to EEO by affirming EEO policies, communicating EEO messages, and modeling EEO in personnel actions.		
Strategy 1.1 At the Agency level, NASA senior leadership conveys the importance of equal employment opportunity through Agency policy, strategic planning, messaging, and behaviors reflective of EEO principles. **Lead Offices/Officials:** Administrator, Deputy Administrator, Associate Administrator, Officials-in-Charge (OICs) of Headquarters (HQ) Offices.		
Actions and Measurements	**Timeframe for Implementation**	**Status/ Accomplishments**
• The Administrator issues annual EEO and Anti-Harassment Policy Statements.	Q3, 2016 Annually	**Accomplished.** The NASA Administrator signed the updated FY 16 Model EEO Agency Plan as well as the updated EEO and Anti-Harassment Policies on 2/16/2016.
• The Administrator issues 2016 Model EEO Agency Plan Update to Officials-in-Charge.	Q3, 2016 Annually	**Accomplished.** The Plan was forwarded to NASA OICs and Center Directors on 3/15/2016, after all documents were made Section 508 compliant.
• EEO policies directives and procedures are updated and disseminated through the NASA Online Directives Information System.	Q1, 2016 Ongoing	**Ongoing.** ODEO updated NPD 3713.2J, Federal EEO Program of NASA (effective 2/25/2016), to reflect current policies, procedures. ODEO continues to update policies and directives in the NODIS system as warranted.
Strategy 1.2 At the Center level, Centers operationalize this Plan through Model EEO Center Implementation Plans that align with the Agency plan. In addition, Center Directors follow the lead of the Administrator and issue/affirm policies reflective of the Agency's commitment to EEO. Center leadership also models behaviors reflective of EEO. **Lead Offices/Officials:** Center Directors, other Center Senior Leadership.		
Actions and Measurements	**Timeframe for Implementation**	**Status/Accomplishments**
• ODEO provides technical assistance to Centers in development of new Center Plans.	Q2, 2015	**Completed.** ODEO provided technical assistance for and feedback on new Center Plans in FY 14 and FY 15.
• Center Directors issue Model EEO Center Implementation Plans and related EEO policies aligned with the Model EEO Agency Plan.	Q1, 2016	**Completed.** Centers submitted their final plans to ODEO in the first quarter of FY 16.

Challenge 2. Proactive Prevention of Discriminatory Actions: NASA will take actions to prevent EEO discrimination in hiring, promotions, leadership development, and awards.

Strategy 2.1 Conduct outreach and recruitment activities for underrepresented groups in science and engineering occupations (African Americans, Asian Americans, Hispanics, and women). **Lead Offices/Officials:** ODEO, OHCM, Education.

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• Targeted outreach and recruitment events are conducted for each underrepresented group.	Q1, 2016 Annually	**Ongoing.** NASA will continue to conduct these activities pursuant to outreach and recruitment plans based on workforce data analyses.

Strategy 2.2 Recruit and retain individuals with targeted disabilities (including disabled veterans) in all NASA occupational categories. **Lead Offices/Officials:** ODEO, OHCM, Education.

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• EEO and HC managers develop strategies for recruiting IWTD.	Q1, 2016 Ongoing	**Ongoing.** NASA will continue to develop strategies for IWTD recruitment based on ongoing workforce data analyses.
• Agency gathers and analyzes data to identify reasons for high separation rates of IWTD.	Q1, 2016 Ongoing	**Ongoing.** NASA will continue to monitor workforce demographics.

Strategy 2.3 Take steps to ensure equal opportunity in promotions, performance ratings, awards (performance and honorary), and leadership development programs. **Lead Offices/Officials:** ODEO, OHCM

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• The Associate Administrator (AA), ODEO, continues to serve on the NASA Performance Review Board (PRB), Executive Resources Board (ERB), and Employee Development Advisory Board (EDAB) and participate in other high-level meetings to ensure EO and demographic diversity are supported during discussions and decision making.	Q1, 2016 Ongoing	**Ongoing.** The AA, ODEO, will continue to serve on these boards and meetings.
• ODEO and OHCM jointly review systems and processes for promotions, awards, performance ratings, and leadership development programs; brief senior leadership on potential disparities for women, minorities, and IWD; and provide recommendations for improvements.	Q1, 2016 Ongoing	**Ongoing** ODEO and OCHM will continue to review these systems and processes and make recommendations for improvements.

Strategy 2.4 Better utilize the Special Emphasis Programs (SEPs) to proactively prevent discrimination. **Lead Office/Official:** ODEO		
Actions and Measurements	**Timeframe for Implementation**	**Status/Accomplishments**
SEP Team report is finalized and recommendations are disseminated to NASA Centers.	Q1, 2016	**Completed.** The ODEO document, *NASA Guidance: A Strategic Approach to Special Emphasis Program Management*, was finalized on 1/28/16 and transmitted to HQ OICs and Center Directors on 2/10/16.
ODEO and NASA Centers begin implementing recommendations.	Q2, 2016 Ongoing	**Completed/Ongoing.** ODEO conducted a briefing on the SEPM guidance for Center EO and Diversity Managers on 2/3/16. Implementation is ongoing.
Strategy 2.5 Continue education and awareness efforts, such as the Conflict Management Program and the ODEO Information Resource Guide. **Lead Office/Official:** ODEO		
Actions and Measurements	**Timeframe for Implementation**	**Status/Accomplishments**
Enhance Conflict Management Program training and information offerings.	Q1, 2016 Ongoing	**Ongoing.**

Challenge 3. Integration of EEO into the Agency Strategic Mission: EEO is viewed as a fundamental part of the Agency mission.		
Strategy 3.1 Include EEO performance in the Agency Strategic Plan. **Lead Offices/Officials:** ODEO, OCFO		
Actions and Measurements	**Timeframe for Implementation**	**Status/Accomplishments**
• ODEO works with the OCFO to develop annual EEO performance indicators and reports progress on EEO to the Chief Financial Officer (CFO).	Q1, 2016 Quarterly	**Ongoing.**
Strategy 3.2 Communicate EEO concerns, priorities, and performance indicators to the Administrator and other Agency leadership on a regular basis. **Lead Office/Official:** AA, ODEO		
Actions and Measurements	**Timeframe for Implementation**	**Status/Accomplishments**
• The AA, ODEO, will meet monthly with the NASA Administrator to keep him apprised of leading EEO issues and concerns.	Q1, 2016 Monthly	**Ongoing.** The AA, ODEO will continue regular meetings with the NASA Administrator and other NASA leaders.
• ODEO will report on EEO progress at least twice per year at the BPR meetings.	Q3, 2016 Biannually	**Ongoing.** ODEO will continue reporting on EO, D&I, complaints, ADR, and the Anti-Harassment Program at the BPR.

	Timeframe for Implementation	
• ODEO will present a "State of EEO" briefing to NASA senior leadership.	Q3, 2016 Annually	**Annual**. ODEO conducted the annual "State of EEO" briefing on 5/23/16; the NASA Administrator, Deputy Administrator, and Associate Administrator, among other top leaders, attended.

Strategy 3.3 Consider EEO in Agency deliberations prior to decisions regarding recruitment strategies, succession planning, and other workforce policies and plans that may impact EEO progress directly or indirectly. **Lead Offices/Officials:** NASA Administrator, Officials-in-Charge of Headquarters Offices

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• The AA, ODEO, or her representative will participate in executive-level meetings such as the Strategic Management Council to ensure EEO is supported in top-level decision making.	Q1, 2016 Quarterly	**Ongoing**. The AA, ODEO, will continue to participate in these meetings.
• The AA, ODEO, and the Assistant Administrator, OHCM, will meet quarterly to discuss overlapping areas of concern and develop collaborative programmatic strategies.	Q1, 2016 Monthly	**Ongoing**. The AA, ODEO, will continue to participate in these meetings.

Challenge 4. Management and Program Accountability: NASA managers and supervisors will be held accountable for advancing EEO.		

Strategy 4.1 Rate managers and supervisors on EEO performance as part of their annual performance appraisals. **Lead Offices/Officials:** NASA Administrator, second-level (and above) supervisors

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• EEO and diversity performance will be included in performance plans and appraisals of all supervisors and managers, including SES and non-SES supervisors.	Q1, 2016 Ongoing	**Completed/Ongoing**. NASA continues to provide guidance on changes implemented to supervisors and managers' performance plans in FY 13 and later. There continues to be a need to develop better performance measurements in this area.

Strategy 4.2 Evaluate EEO operations through onsite functional reviews of NASA Centers. **Lead Office/Official:** ODEO

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• ODEO will conduct at least one onsite EEO/diversity functional review of a NASA Center and report findings, recommendations, and promising practices to the Center Director and EEO Director.	Q4, 2016 Annually	**Completed/Annual.** ODEO conducted a functional review of KSC in September 2016. Working continues on streamlining the process.

Challenge 5. Efficiency of EEO Operations: NASA improves EEO delivery through more efficient systems and processes.

Strategy 5.1 Improve the Agency's timeliness and consistency in providing reasonable accommodations to qualified individuals with disabilities. **Lead Office/Official:**

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• Identify deficiencies in the Agency's Reasonable Accommodation Management System (RAMS) and work with the database administrator to make needed updates.	Q4, 2016	**Ongoing.**
• Explore options for improving the provision of reasonable accommodations.	Q4, 2016	**Ongoing.**

Strategy 5.2 Encourage ADR and earlier settlement of discrimination complaints. **Lead Office/Official:** ODEO

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• ODEO will update and enhance NPR 3713.2, ADR for Discrimination Complaints.	Q4, 2016	**Implementation Timeline Extended**. ODEO expects to issue the new NPR in the second quarter of FY 17.
• Improve marketing of ADR by redrafting and disseminating ADR brochures and other materials.	Q4, 2016	**Implementation Timeline Extended**. ODEO continues to develop ADR marketing materials and expects to disseminate such materials by the fourth quarter of FY 17.

Strategy 5.3 Streamline processing of discrimination complaints (e.g., investigations and FADs) to meet regulatory timeframes. **Lead Office/Official:** ODEO

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• Identify inefficiencies in the processing of EEO formal complaints and develop strategies to effectively resolve them.	Q4, 2016 Ongoing	**Ongoing.** ODEO continues to explore new strategies for resolving inefficiencies in complaints processing. This work has been slowed due to staffing losses in the Complaints Management Division.
• Streamline the process of issuing acceptance/review letters, investigations, and FADs by eliminating duplicative layers of review and shortening the review and approval periods.	Q4, 2016 Ongoing	**Ongoing.** ODEO continues to explore new strategies for streamlining these processes. This work has been slowed due to staffing losses in the Complaints Management Division.

Challenge 6. Responsiveness and Legal Compliance: NASA is in compliance with EEO statutes, EEOC regulations and guidance, and with its own Policy Directives and Procedural Requirements.

Strategy 6.1 Ensure Agency reasonable accommodation procedures meet EEOC guidelines. **Lead Office/Official:** ODEO

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• Update NPR 3713.1A, Reasonable Accommodations Procedures, incorporating EEOC recommendations and making the procedures more clear and efficient.	Q2, 2015	**Completed.** The new procedures were issued on 3/2/15 as NPR 3713.1A.
• Disseminate information to managers and employees regarding the new procedures.	Q4, 2016	**Implementation Timeline Extended**. The development of an informational brochure on disability and reasonable accommodations is in process.
• Develop and deploy training for all employees regarding the new procedures.	Q4, 2016	**Completed/Ongoing.**

Strategy 6.2 Implement requirements of the Notification and Federal Employee Antidiscrimination and Retaliation (No FEAR) Act of 2002. **Lead Office/Official:** ODEO

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• Deploy Agency-wide No FEAR Act training and monitor completion rates.	Q1, 2016 Biannually	**Biannual.** No FEAR Act Training will be deployed in FY 17.
• Submit No FEAR Act Report to Congress, the White House, EEOC, the Office of Personnel Management, and the Department of Justice.	Q3, 2016 Annually	**Annual.** ODEO submitted the annual No FEAR Act report to the Office of Legislative and Intergovernmental Affairs on 3/26/16.

Strategy 6.3 Continue to enhance the Agency's Anti-Harassment Program to ensure it comports with EEOC guidance. **Lead Office/Official:** ODEO

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• Issue updated Anti-Harassment Implementation Guide as part of ongoing technical assistance and training for the Agency anti-harassment practice community.	Q4, 2016	**Implementation Timeline Extended**. ODEO expects the updated Anti-Harassment Implementation Guide to be issued by the end of the second quarter of 2017.

Strategy 6.4 Continue to upgrade NASA facilities to ensure compliance with Federal law and accessibility for IWD. **Lead Offices/Officials:** ODEO, Office of Strategic

Actions and Measurements	Timeframe for Implementation	Status/Accomplishments
• Increase percentage of facilities accessible to IWD (that need to be).	Q4, 2016 Ongoing	**Ongoing**. Since FY 12, NASA has increased the percentage of its facilities that are in compliance with the Americans with Disabilities Act from 56 to 64 percent. Work continues in this area.