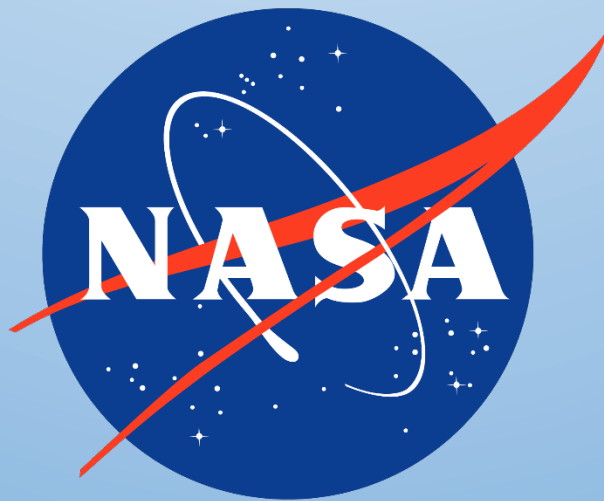


NASA GUIDANCE FOR SUPPORTING GENDER TRANSITION/AFFIRMATION IN THE WORKPLACE



January 2022

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Introduction

In alignment with our core value of Inclusion, NASA is committed to embracing and fully supporting any employee's gender transition and affirmation, and ensuring that all employees, applicants, and visitors are treated in a respectful, professional manner. This includes individuals who are transitioning or have transitioned¹, as well as those who are gender non-conforming, gender expansive, non-binary, or gender fluid (e.g., employees expressing their² gender identity through attire, grooming, personal style, voice, mannerisms, medical treatments,³ and/or name and personal pronoun preference – in alignment with their gender identity).

As such, these guidelines were developed to address gender transition in the NASA workplace. If an employee communicates their intent to transition to a different gender, NASA is committed to supporting the employee's announced plans, within the span of systems and data within NASA's control. In addition, depending on the physical requirements of the employee's job and the potential physical changes of the transition, management will work to ensure the employee can perform their job safely and effectively (e.g., customization of spacesuits).

These guidelines are consistent with NASA's policy which protects employees against discrimination on the basis of gender identity and gender expression. The guidance herein does not address every workplace situation that might arise but instead offers an overview and processes to follow in assessing each employee's needs on a case-by-case basis. These guidelines provide managers and supervisors a framework for ensuring employees gender identity and gender transition needs are addressed with dignity and respect.

NASA promotes equal employment opportunity for its employees and applicants, and it does not tolerate unlawful discrimination or harassment, including on the basis of gender identity, gender expression, sex, or sexual orientation. As such, NASA seeks to provide a work environment founded on respect, trust, and collaboration to help create a sense of belonging by which employees can bring their whole and authentic selves to work, fully contribute, and thrive in their careers.⁴ This guidance is intended to help all individuals at NASA (including supervisors and employees) maintain an inclusive and supportive workplace for gender transition and affirmation, and to communicate and reinforce NASA's strongest support for all employees with respect to the full spectrum of gender identity and expression.

¹ For simplicity, the term "transitioning employee" is used throughout this document to refer to any civil servant or contract employee in the process of transitioning to a different gender.

² Please note this document uses the terms "they", "them", "their", and "theirs" as gender-neutral, generic stand-ins for any pronoun that the transitioning employee prefers to use.

³ Medical treatments might include hormone injections, counseling, and/or surgical procedures.

⁴This document serves as a high-level guidance and is not intended to serve as granular Standard Operating Procedures addressing every possible workplace situation that could arise. For procedures and instructions on any specific employment action (e.g., how an employee may change their name in personnel files or security badging), please consult the appropriate Center organization with responsibility over the specific action (e.g., Office of the Chief Human Capital Officer (OCHCO) or Office of Protective Services (OPS)).

Any employee or applicant who believes they have been discriminated against based on gender identity has the right to file a complaint of sex discrimination under the Equal Employment Opportunity (EEO) complaints process. To initiate the process, contact an EEO Counselor at the Center where the alleged discrimination took place within 45 calendar days of the date of the matter alleged to be discriminatory. Contact information for each Center's Office of Diversity and Equal Opportunity (ODEO) may be found at <https://www.nasa.gov/offices/odeo/home>. In addition, if the individual believes they have been subjected to harassing conduct, their manager or supervisor, or the Center's anti-harassment coordinator, should be notified. Harassment based on gender identity is covered under the Agency's anti-harassment policy and procedures at http://www.hq.nasa.gov/office/nasaonly/odeo/anti-harassment_brochure-final.pdf.

For additional information on gender transition/affirmation, equity, diversity and inclusion, and anti-harassment at NASA, please visit the Agency ODEO website at <https://www.nasa.gov/offices/odeo/home>.

In General – Gender Transition/Affirmation

This document uses the term “gender transition/affirmation” to refer to the process of an individual publicly changing their gender expression, including through their attire, grooming, personal style, voice, mannerisms, medical treatments, and/or name and personal pronoun preference – in alignment with their gender identity. This document uses the term “transitioning employee” to refer to any civil servant or contract employee in the process of transitioning to a different gender.

Transitioning employees may have a diversity of individual gender transition/affirmation needs, challenges, and preferences. For example, not everyone who considers themselves transgender will undergo a medical (or physiological) transition procedure, and those who choose to undergo such procedures may opt for all or only some available options. Gender transition is a personal process and will vary from person to person.

Each transitioning employee will have their own set of unique factors that will require a customized plan of action. The transitioning employee should communicate and work with their supervisor and their Human Resources representative to enable a smooth transition in the workplace, and the employee should be empowered to set the pace and the tone of these communications. Transitioning employees have the right to be open and feel safe about their identity, and to professionally express their gender identity or characteristics in the manner they choose. Transitioning employees may specifically elect to disclose their transition to key stakeholders at the Agency who can provide assistance with the employees' workplace transition. These key stakeholders may include, but are not limited to:

- Immediate supervisor or another supervisor at NASA;
- The Office of Chief Human Capital Officer (OCHCO), the NASA Shared Services Center (NSSC) and/or their Servicing Human Resources (HR) Office;

- Office of Diversity and Equal Opportunity (ODEO);
- Employee Assistance Program (EAP) representatives;
- Applicable Employee Resource Group (ERG) leaders/members; and
- Other employees/co-workers.

Privacy & Confidentiality

Employees have the right to be who they are without unnecessary disclosure of medical information or gender history. An employee’s transgender or transitioning/affirming status or history is considered private and should only be disclosed on a need-to-know basis by NASA officials.

Key Terms

The following definitions are provided for clarity in understanding and applying this guidance.

- **Affirming name/gender/pronoun(s)** are terms used to refer to the name, gender, and pronouns with which an individual identifies and will use the following gender transition/affirmation at NASA. See also “**Dead name/gender/pronoun(s).**”
- **Agender** is a term some individuals use to identify as no gender.
- **Cisgender**⁵ is a term used for an individual who internally identifies as the gender corresponding to the sex that the individual was assigned at birth.
- **Dead name/gender/pronoun(s)** are terms used to refer to the name, gender, and pronouns an individual used prior to gender transition/affirmation, but no longer uses. See also “**Affirming name/gender/pronoun(s).**”
- **Gender expansive** is an umbrella term sometimes used to describe people who expand notions of gender expression and identity beyond perceived or expected societal gender norms. Some gender-expansive individuals identify as a mix of genders, some identify more binarily as a man or a woman, and some identify as no gender (see also **agender**).⁶

⁵ It should be noted that the prefixes “cis” (meaning ‘in alignment with’) and “trans” (meaning ‘across from’) have been in use for many years, evidenced in terms such as Translunar Injection and Cislunar Orbit. In common vernacular, the terms “cisgender” and “transgender” are sometimes shortened to “cis-” and “trans-,” as in cis-woman or trans-man.

⁶ Gender-expansive people might feel that they exist among genders, as on a spectrum, or beyond the notion of the man/woman binary paradigm. Sometimes gender-expansive people use gender-neutral pronouns, but people can exist as any gender while using any pronouns. They also may or may not be comfortable with their bodies, regardless of how they express their gender.

- **Gender expression** refers to how a person represents or expresses gender identity to others. This might be communicated through appearance, dress, mannerisms, speech patterns, social interactions, name, and/or other characteristics and behaviors. The observed expression may or may not correspond to societal expectations of gender identity.⁷
- **Gender identity** is a term that refers to an individual’s internal sense of being a male, female, another gender, no gender, of multiple genders, or fluid in gender (see also definition of “**gender non-binary**”). A person’s gender identity is not necessarily linked to sexual, romantic, or emotional orientation.

It is important to note that gender identity and gender expression are unrelated to sexual orientation. For example, a person assigned male at birth, transitioning to female gender, does not automatically change sexual orientation. If she was attracted to women before transitioning and is attracted to women after, then she is a lesbian, or gay. If she was attracted to men both before and after transition, she is heterosexual.

- **Gender non-binary** is a term used for an individual whose gender identity is both male and female, neither male nor female, or fluid. Some individuals who identify as gender non-binary also identify themselves as “gender queer” or “gender expansive.”
- **Gender non-conforming** is a broad term used to refer to people who do not appear, behave, or identify in conformity with societal gender norms, stereotypes, expectations, or preferences.
- **Gender transition/affirmation** is a term used to refer to the process by which a transitioning employee changes their gender expression in the NASA workplace. This may or may not include changing their name and/or gender on legal documents, receiving medical treatment such as hormone replacement therapy, counseling, and/or surgical procedures.
- **Intersex** is a term used to refer to people who are biologically between the medically expected definitions of male and female. This can be through variations in hormones, chromosomes, internal or external genitalia, or any combination of any or all primary and/or secondary sex characteristics. While many intersex people are noticed as intersex at birth, many are not. As intersex is about biological sex, it is distinct from gender identity and sexual orientation. An intersex person can be of any gender identity and can also be of any sexual or romantic orientation. In the past, the medical terms “hermaphrodite” and “pseudohermaphrodite” were used; these terms are now considered neither acceptable nor scientifically accurate.
- **LGBTQ+** is an acronym that is often used as an umbrella term referring to lesbian, gay, bisexual, transgender, queer/questioning, intersex, asexual, and other individuals who do

not identify as typically cisgender and heterosexual. LGBTQIA is an equivalent acronym that also includes allies.

- **Sex** is a term that refers to anatomical, physiological, genetic, or physical attributes typically used to assign a person as male, female, or intersex at birth. These include both primary and secondary sex characteristics, including genitalia, gonads, hormone levels, hormone receptors, chromosomes, and genes. Variations of this term might also include “biological sex,” “physical sex,” “anatomical sex,” or “sex assigned at birth.”
- **Transgender⁸** is an umbrella term that refers to people whose gender identity and/or expression is different from the sex and gender assigned to them at birth (e.g., the term transgender woman typically is used to refer to someone who was assigned male at birth but who identifies as female; the term transgender man typically is used to refer to someone who was assigned female at birth but who identifies as male). An individual does not need to undergo any medical procedure to be considered transgender.
- **Transitioning employee** is an umbrella term used in this document to broadly refer to any employee who is undergoing, is about to undergo, or has undergone the process of changing gender expression in the workplace. This employee might stay at a specific point of the gender transition/affirmation spectrum; they might move along the gender transition/affirmation spectrum via a one-time, one-direction, finite sequence of actions; or they might move through a continuous, evolving, or even multi-directional flow.

Key Stakeholders, Roles, and Responsibilities in the Gender Transition/Affirmation Process at NASA

The following information is provided on key stakeholders and their various roles and responsibilities:

Transitioning Employee:⁹ See definition of “Transitioning Employee” under “Key Terms” of this document.

Supervisor of the Transitioning Employee: Supports transitioning employee and promotes, cultivates, and reinforces non-discriminatory inclusive practices and a safe work environment.

⁸ It should be noted that the prefixes “cis” (meaning ‘in alignment with’) and “trans” (meaning ‘across from’) have been in use for many years, evidenced in terms such as Translunar Injection and Cislunar Orbit. In common vernacular, the terms “cisgender” and “transgender” are sometimes shortened to “cis-” and “trans-,” as in cis-woman or trans-man.

⁹ Contractor employees should work directly with their contractor management regarding employment-related requirements applicable to gender transition/expression in the workplace. Contractor employees should promptly contact their relevant Center anti-harassment coordinator or the Agency anti-harassment coordinator to report claims of harassment or discrimination.

Agency Office of Diversity and Equal Opportunity (ODEO): Establishes transition/affirmation policy and procedures, and provides technical assistance and oversight of implementation, through Center ODEO LGBTQ+ Special Emphasis Program Managers (SEPMs) and in coordination with agency-level partners and stakeholders.

NASA Shared Services Center (NSSC) and/or Servicing HR Office: Works with transitioning employees, Center LGBTQ+ SEPMs, and internal staff and external stakeholders to process related personnel actions (e.g., updating transitioning employees' records to reflect current genders, names, and pronouns, upon request of the transitioning employee). The NSSC and Servicing HR Office are essential partners in processing personnel actions required for gender transition/affirmation in the workplace – from answering questions to initiating and facilitating updates to NASA-hosted data systems and resources on behalf of the transitioning employee. Servicing HR Offices also may be involved in providing relevant training to the workforce (e.g., sensitivity/awareness training).

Center Facilities Office: Coordinates with the Center ODEO and Servicing HR Office to ensure the avoidance and removal of barriers to equal access to NASA facilities (e.g., availability of gender-inclusive restrooms or locker rooms) for employees, applicants, and visitors.

Center Office of Protective Services: Provides needed services to ensure work accessibility for transitioning employees throughout their transition/affirmation process, including but not limited to physical security, personnel security, identity and credential management (badging), and electronic physical access management.

Co-workers: Comprise a large and significant proportion of the transitioning employee's work environment; therefore, they also play a major role in the experience of the transitioning employee.

Recommended Process for Transitioning Employees

All NASA employees are protected under non-discrimination and anti-harassment laws and policies. ***Although an employee is not required to provide notification about their intended gender transition/affirmation to NASA (e.g., to the employee's supervisor, Center ODEO, NSSC or Servicing HR Office), NASA strongly encourages employees to provide this notice*** because NASA can better support the employee's transition/affirmation process if the Agency is aware of the transitioning employee's needs.

NASA recommends, but does not require, that transitioning employees follow the steps below when changing gender expression in the workplace:

1. **Notification of Intent:** The transitioning employee is encouraged to notify their immediate supervisor, the NSSC, their Servicing HR Office, and/or their Center ODEO of their intended or ongoing gender transition/affirmation. The employee is encouraged to initiate contact

well in advance, if possible, so the Agency can be as engaged and supportive as possible throughout the process.

If the transitioning employee feels uncomfortable contacting their supervisor at first, they are encouraged to consult their Center LGBTQ+ SEPM, LGBTQ+ ERG, or EAP for additional information and/or support. Transitioning employees are encouraged, however, to engage their supervisor to ensure they receive full support throughout the gender transition/affirmation process, including multiple stages that may require assistance or action by the supervisor.

2. **Establishment of a Support Team:** The transitioning employee is encouraged to establish a support team of their design and choosing. Support teams might include, but should not be limited to: the transitioning employee’s supervisor; representatives of the NSSC and/or Servicing HR Office; the Center LGBTQ+ SEPM; one or more members of the Center LGBTQ+ ERG; a representative of the Center EAP; and any others identified by the employee.
3. **Development of a Workplace Gender Transition/Affirmation Plan:** To foster a clear, planned, and coordinated process, the transitioning employee is encouraged to develop a Workplace Gender Transition/Affirmation Plan, in consultation with members of their support team (a sample Workplace Gender Transition/Affirmation Plan can be found in Appendix A of this document). Such plans are not required but will likely inspire mutual understanding, facilitate collaboration, promote communication, and reduce uncertainties for all parties involved – all resulting in a smooth, efficient, and helpful process to help employees with their workplace gender transition/affirmation. While timing is an important factor to include in the plan, the plan should not be treated as a strict timetable or formal contract, as situations and needs may change based on any number of factors. Furthermore, some aspects of workplace gender transition may evolve over time, necessitating different timeframes and solutions. The transitioning employee and their supervisor and support team should regularly engage and collaborate on resolving any questions or concerns that may arise while developing or implementing the plan.

NASA recommends that a Workplace Gender Transition/Affirmation Plan includes the following, at a minimum: (1) the initial date upon which the transitioning employee plans to change gender expression at work (“effective date”); (2) the name and/or pronouns that others should use from that date forward; and (3) any process by which the transitioning employee prefers to provide awareness of their gender transition to others in the workplace.

The Workplace Gender Transition/Affirmation Plan might also include:

- Expected timelines, based on anticipated milestones and other events¹⁰;

¹⁰ Consider, for example, the timing necessary to change legal name and data systems including timekeeping, payroll, and badging/security/access to facilities and electronic systems. The employee may need to consult the NSSC or their Servicing HR Office, as appropriate, for guidance and timing on name change requests and their Center OPS for badging and access issues.

- Whether the transitioning employee chooses to play an active role in informing/educating their co-workers, clients, or others¹¹;
- Whether and when the transitioning employee anticipates taking any extended periods of leave; and
- Any specific issues that may need to be addressed (for example, whether any accommodations might be needed following medical treatment/procedure(s)).

Appendix B identifies some of the elements that may need to be updated as a result of gender transition/affirmation. Appendix C provides sample tools for supervisors of transitioning employees.

Recommended Practices for Supervisors

NASA recommends the following two main responsibilities for the supervisor of a transitioning employee:

1. Support the transitioning employee.

- Maintain a focus on the goal of the workplace gender transition/affirmation process. The ultimate goal of the process is for NASA to fully support and help transitioning employees proceed and complete their workplace gender transition/affirmation in an efficient, effective, constructive, and inclusive manner to support the employees' engagement and wellness at work. This will enable employees to continue bringing their authentic and whole selves to work, and to be fully included and contribute to NASA's mission.
- Demonstrate patience, genuine empathy, and commitment. For a transitioning employee, notifying their employer about their transition might be a stressful event, compounded with concerns about the possibility of rejection, discrimination, job loss, or more. Supervisors should consistently treat the employee with respect, concern, and care, and be aware of and sensitive to the stress and anxiety possibly experienced by the employee before, during, and/or after their workplace gender transition/affirmation process.
- Engage in interactive dialogue with the transitioning employee. Listen to the employee's needs and concerns, and support a process and experience for the employee that is inclusive, welcoming, and free from unlawful discrimination and harassment.
- Be willing and available to collaborate with the transitioning employee on the development, implementation, and evolution of a Workplace Gender.

¹¹ The transitioning employee should be empowered to decide whether their gender transition/affirmation is acknowledged or announced, including what information should be included in any announcement, who will make the announcement, and how the announcement will be made.

- Transition/Affirmation Plan. The plan can facilitate clear and uniform understanding and support of an efficient and effective process, in efforts to promote a safe, secure, and respectful work environment before, during, and after the employee's gender transition/affirmation. The focus of the plan should be to provide support and assistance to the transitioning employee, not compliance with the Workplace Gender Transition/Affirmation Plan.
- Follow the lead of the transitioning employee. Supervisors should follow the lead and comfort level of the transitioning employee in discussions and collaborations on the employee's Workplace Gender Transition/Affirmation Plan. Supervisors should discuss with the transitioning employee if they want to actively engage in any notification of their colleagues and, if so, how (see Appendix C for suggested language for making such notifications).

Supervisors should note that their assistance and support may also be needed if/when the transitioning employee requests changes to NASA-hosted systems or resources or different supplies (e.g., business cards, if cards are provided to all employees). Appendix B provides a list of potential actions that may be further supplemented to fully support transitioning employees.

Supervisors should provide sufficient flexibility to meet the transitioning employee's needs for medical appointments. Supervisors should consider and grant leave requests for medical appointments relating to gender transition/affirmation by following NASA policy and procedures applying to all leave.

If and when a supervisor makes a gender transition/affirmation announcement (upon request of the transitioning employee), the supervisor should mention the availability of resources, including support organizations such as the Center ODEO, the NSSC and/or Servicing HR Office, the LGBTQ+ ERG, and/or the EAP. Supervisors should inform other employees that if they choose to ask a transitioning employee about the transitioning employee's gender transition/affirmation, any and all questions or discussions should be respectful in tone and appropriate in content and context (the same as with any other employee) – with the understanding that if the transitioning employee wishes to keep such details private, those wishes must be respected. Supervisors are also encouraged to reaffirm the Agency's commitment to equal employment opportunity, diversity, inclusion, and anti-harassment. Appendix C provides additional points that supervisors may wish to consider when communicating about gender transition/affirmation in the workplace.

2. Model non-discriminatory practices and promote, cultivate, and reinforce an inclusive work environment.

- Supervisors have a responsibility to promote, model, cultivate, and reinforce a work environment that is inclusive and free from harassment and illegal discrimination. Supervisors should communicate strong support for transitioning employees and set an example and expectations for all employees on appropriate conduct and full support.
- Supervisors are required to take appropriate steps to address and correct any situation in which the supervisor has awareness (or reasonably should be expected to have awareness) of offensive remarks or behavior relating to an employee's gender transition/affirmation, including promptly contacting the Center's anti-harassment coordinator.

Recommended Practices for Co-workers

The following provides an initial, but not all-inclusive, set of recommended practices for co-workers of transitioning employees:

- Be familiar with NASA's policies prohibiting unlawful discrimination and harassment, including on the basis of gender identity, gender expression, and/or non-conforming status.
- Do not engage in any prohibited discriminatory or harassing behavior in the workplace.
- Be mindful not to make assumptions about a person's sexuality or gender – not everyone's appearance or behavior matches societal stereotypes.
- Maintain an open mind and willingness to listen and engage in discussion and learning.
- Be respectful and honest when interacting or communicating with a transitioning employee, as you would with any other employee:
 - If gender transition/affirmation is new for you, it is not abnormal to feel awkward at first. There may be learning experiences or awkward moments for all.
 - Be genuine and sincere in your communications with your co-workers, especially in your desire to learn how to best communicate respectfully with them. Let your co-workers know you support their inclusion and access to a respectful and safe work environment free from unlawful discrimination.
 - Ask your co-worker to be honest with you about what you say or do that may make them uncomfortable. Be prepared for an honest response. Listen, be respectful, learn, and support NASA's culture of inclusion and employee engagement.
 - Let your co-worker know if they say or do something that makes you uncomfortable, being mindful that mutual respect is essential.
 - If you choose to ask an employee about their transition, ensure your communication and interaction consistently demonstrates respect and appropriate professionalism in content and tone. Consider whether you would ask a cisgender co-worker the

same question. Before asking a personal question, consider what value the response to your question might have, as well as the potential impact on the other person. If the transitioning employee wishes to keep details of their transition/affirmation private, respect the wishes of the employee.

- Do not disclose the transitioning employee’s transition/affirmation plan, gender identity, gender history, and/or gender expression without the express consent of the transitioning employee.
- Be a good ally. If you hear or observe a co-worker using an incorrect name or incorrect pronouns after an announcement or request to refer to the transitioning employee by a specific name and with specific pronouns, gently and discreetly correct them or discuss the matter with your supervisor. If you become aware of any offensive workplace conduct relating to a co-worker’s gender transition/affirmation, you should promptly contact an appropriate NASA official (e.g., the Center anti-harassment coordinator or a supervisor).
- Consider reaching out to your Center LGBTQ+ ERG for self-education and awareness.
- Reach out to your supervisor, the Center ODEO, or the EAP if you have questions and/or concerns.

Because some people might be unfamiliar with gender transition/affirmation, it is possible that co-workers might make mistakes, such as referring to the transitioning employee by the wrong name or pronoun, or by asking inappropriate questions. Transitioning employees are encouraged to gently correct co-workers who make mistakes, especially early in the transition/affirmation process. It is assumed that mistakes will become less frequent after a reasonable period of time.¹² However, if an employee continually addresses the transitioning employee by the wrong name, pronouns, and/or gender identity after a reasonable period of time, the transitioning employee may contact their supervisor, support team, and/or the Center ODEO for guidance.

Federal laws and NASA’s policy on equal employment opportunity prohibit adverse employment actions based on an employee’s gender or gender identity. Additionally, NASA will not honor any request that an employee, contractor, vendor, or customer makes to avoid working with a transitioning employee.

Outside of information voluntarily disclosed by the transitioning employee, employees should not discuss medical conditions or procedures with other employees. Employees should keep medical information confidential. Discussion of such information at the workplace is a breach of confidentiality that could subject the Agency to liability.

¹² What is considered a “reasonable period of time” may differ in length depending on the relationship of the co-worker to the transitioning employee.

Assistance Through the NASA Shared Services Center (NSSC) and Center Servicing HR Offices

The NSSC and Center Servicing HR Offices are available to assist the transitioning employee in making official name and gender change requests, in requesting reconstruction of their electronic Official Personnel Folder (eOPF) due to gender change, and in changing their NASA ID badge and PIV credential. It should be noted that a name change prompts the need for the transitioning employee to update their PIV credential and NASA ID badge accordingly.

Requesting a Name Change: The transitioning employee should initiate their name change request through the Servicing HR Office. Refer to [Chapter 20 of the Office of Personnel Management's \(OPM's\) Guide to Processing Personnel Actions](#) for more details, including the types of supporting documentation that will be required.

Requesting a Gender Change: The transitioning employee should initiate their gender change request through the Servicing HR Office. Refer to [OPM's Guide to Personnel Recordkeeping](#) for more details, including the types of supporting documentation that will be required.

Requesting Reconstruction of the electronic Official Personnel Folder (eOPF) due to Gender Change: Employees requesting a reconstruction of their eOPF must provide a written statement with their signature and date to their Servicing HR Office at the time they make a gender change request. The transitioning employee should consult their Servicing HR Office about the specifics of the statement, including supporting documentation.

Changing NASA ID Badge and PIV Credential: Concurrent with an official name change, an employee also needs to update their NASA ID badge and PIV credential. The transitioning employee should coordinate their name change with their Servicing HR Office and Security Office, following the processes described in [NASA Procedural Requirements \(NPR\) 1600.4, Identity and Credential Management](#), specifically Chapter 3.5 (On-Site Enrollment and Issuance Procedures for NASA Credentials) and Chapter 6.6 (PIV Credential Re-issuance).

Additional Points to Consider Regarding Gender Transition/Affirmation

Right to Privacy. A transitioning employee has the right to be who they are without unnecessary disclosure of personal or medical information. The transitioning employee should understand that some individuals, groups, and/or organizations might be made aware of their gender transition/affirmation on a need-to-know basis in order to process the transitioning employee's request(s), including personnel actions such as changes to employee records. Supervisors, Agency and Center ODEO staff, NSSC and Servicing HR Office staff, and others should be mindful not to disclose information identified in the transitioning employee's

Workplace Gender Transition/Affirmation Plan, or in any other communications to implement changes requested by the transitioning employee, except on a need-to-know basis or with the transitioning employee's consent. Release of information regarding an employee's planned, ongoing, or past gender transition/affirmation may result in unauthorized disclosure of confidential information prohibited under laws such as the Rehabilitation Act of 1973 and the Privacy Act.

Appearance Standards. Whether or not a transgender employee plans to medically or legally transition, the employee is permitted to dress consistently with their gender identity. NASA does not restrict employees' clothing, hair style, or other aspects of appearance on the basis of gender or gender stereotypes. Any requirements or expectations imposed regarding appropriate attire will not be applied based on gender. All employees have a right to comply with NASA's dress code in a manner consistent with their gender identity or gender expression. Additionally, NASA's dress code does not prohibit an individual from maintaining a gender-neutral appearance.

Access to Restroom, Locker Rooms, and Other Dedicated Gender-Specific Areas. NASA continues to work to provide all employees equitable access to restrooms, locker rooms, and other facilities, including rebranding single-occupancy areas where possible as gender-neutral to accommodate the full spectrum of genders. A transitioning employee may use the restroom, locker room, or other facility that they feel most comfortable using. If there are instances in which others have personal concerns about sharing a restroom, locker room, or other facility with a transitioning employee, supervisors should exercise care in discussing such matters or refer concerned individuals to the Center ODEO, the NSSC or Servicing HR Office, or the EAP. The transitioning employee should not be asked or required to use an alternate facility in order to accommodate such concerns. Further, NASA will not require a transitioning employee to have undergone any particular medical procedure or to provide proof that the employee underwent any procedure, in order for that employee to have access to any facility designated for use by a particular gender.

Pronoun and Name Changes. Upon notification of a transitioning employee's intent to use a new name, and consistent with their Workplace Gender Transition/Affirmation Plan, managers/supervisors should take steps to use the employee's affirming name and pronouns in all personnel, administrative records, and materials, path forward (e.g., all website pages, identification badge/access card, door/name plates, business cards, organizational charts, mailing lists, telephone listings, etc.).¹³ Transitioning employees should take reasonable steps to inform colleagues of their preferred pronouns. However, if there is uncertainty of the appropriate pronouns to use with an individual, it is appropriate to respectfully ask the employee which pronoun they prefer. Managers/supervisors should be aware that intentionally referring to someone by the wrong name or pronouns after they have made them clear, could be viewed as a violation of NASA's anti-harassment policy and procedures.

¹³ It should be noted that while a preferred name and pronoun should be used insofar as possible, certain records may need to be retained using the employee's legal name until changed.

Changes to Personnel Records and Identity Documents. Transitioning employees may wish to change their official personnel records and other records to reflect their name, gender, and/or pronouns. Employees and their support teams should work with the NSSC or their Servicing HR Office, as appropriate, to determine the steps and associated timelines for changing personnel records and other identity documents.¹⁴

Employees involved in the record-changing process must ensure steps are taken to maintain confidentiality during the transition/affirmation process. For example, record changes should be coordinated to coincide with the effective date of the transition/affirmation, or soon after so as not to reveal sensitive or private information beforehand. If the transitioning employee is uncomfortable with a specific employee's involvement in their record-changing process, they should notify a member of their support team as soon as possible.

The transitioning employee should notify insurance carriers and other benefits providers to ensure personnel records reflect the employee's correct name and gender. The Servicing HR Office can assist the employee with the official correspondence required. Transitioning employees who already have Federal insurance benefits are expected to be allowed to continue their participation in their insurance plan, and new employees should be allowed to elect participation based on the gender with which they identify.

¹⁴ This list might include, but is not limited to, health care records, identification tags, door/desk nameplates, computer system login names, and software application login information.

Appendix A: Sample Workplace Gender Transition/Affirmation Plan

The following template is a sample Workplace Gender Transition/Affirmation Plan that can be adopted in whole or in part, as desired.

Transitioning employees may also wish to consider the following when developing their gender transition/affirmation plans:

- Information/documentation required for each record change request, and the estimated time to process each change request.
- Date(s) by which requests may need to be initiated or documentation submitted so that requested changes go into effect by a specific date.
- Follow-up by transitioning employee to ensure that all requested record changes have occurred.
- Whether a change request results in a one-time change, or iterative changes (such as may be the case when the transitioning employee’s physical appearance may change over time).

SAMPLE Workplace Gender Transition/Affirmation Plan For [AFFIRMING NAME] (formerly known as [DEAD NAME])

[EMPLOYEE NAME] (“The transitioning employee”) has notified NASA of their intention to change gender expression in the workplace. This plan will outline the actions and expectations of the Agency, the Center at which the employee is stationed, and the transitioning employee.

1. Key Points of Contact.

Points of Contact <i>(not required to include all)</i>	Name	Email Address	Phone Number
Transitioning Employee			
Supervisor of Transitioning Employee			
Center LGBTQ+ Special Emphasis Program Manager (SEPM)			
Center Servicing Human Resource Office Representative(s)			
Center LGBTQ+ Employee Resource Group, Chair/Member(s)			
Center Employee Assistance Program (EAP) Representative			
Other(s)			

2. Notification of Intent to Change Gender Expression.

The transitioning employee contacted [NAME AND TITLE OR RELATIONSHIP TO EMPLOYEE] to notify the Agency that effective [DATE], the employee will change their name, gender, and/or pronouns, and is to be referred to as [AFFIRMING NAME] with [AFFIRMING PRONOUNS] as pronouns.

3. Identification Changes.

The transitioning employee is responsible for initiating any and all changes related to their gender transition/affirmation including, but not limited to name change, badge, access to facilities, etc.

4. Planned Gender Transition/Affirmation Announcements.

The employee has requested that the following individuals, groups, and/or organizations be made aware of their gender transition/affirmation:

Audience(s) to be notified	Notification Method	Notification Target Date
<i>Example: Sue Smith and Tom Thomas</i>	<i>Email from Supervisor</i>	<i>TBD</i>

The transitioning employee is reminded that there may be additional people who might be made aware of their gender transition/affirmation as a result of processing requested action(s).

Upon request of the transitioning employee, a Gender Transition/Affirmation Announcement Meeting may be convened for those in frequent workplace contact with the employee, such as co-workers, customers, certain teams, etc. The purpose of the meeting is to announce the employee’s gender transition/affirmation, articulate expected norms of conduct, answer questions, and/or implement training. Medical privacy will be maintained. The Gender Transition Announcement Meeting can be conducted by the transitioning employee, a supervisor, a representative from the NSSC or Servicing HR Office, EAP, Center ODEO, or another individual, per the transitioning employee’s request. The transitioning employee may opt to be present in or absent from all or part of this meeting. If the transitioning employee so chooses, they may draft a short letter/email or create another type of brief message to be shared with those attending the meeting.

5. Updating Historical Technical Reports/Work Products.

The employee gives consent/does not give consent (circle one) for historical technical reports and/or work products to be updated with their name and pronouns, following their gender transition/affirmation.

6. Disability-related Reasonable Accommodations.

If a disability-related reasonable accommodation becomes necessary during or after the gender transition/affirmation process, the employee must request the accommodation through NASA's Reasonable Accommodation process, per NPR 3713.1C (Reasonable Accommodations Procedures for Individuals with Disabilities).

7. Family and Medical Leave Act (FMLA).

If the employee wishes to request leave pursuant to the FMLA, the employee must do so through NASA's FMLA leave request process. The employee should consult their Servicing HR Office for information about the availability and use of FMLA leave.

8. Additional Points of Agreement.

Other points of agreement between the employee and their supervisor include the following (for example, anticipated period(s) of leave):

9. Amendment(s) to Plan.

If this transition/affirmation plan needs to be modified for any reason, a request should be made in writing and submitted to the employee's supervisor or support team, who, within a reasonable period of time, will consult with the employee and other pertinent parties, as appropriate, to coordinate review of the proposed amendment(s) and prepare an updated Workplace Gender Transition/Affirmation Plan.

Signatures

_____ Employee	_____ Date
_____ Employee's Immediate Supervisor	_____ Date
_____ Human Resource Office Representative	_____ Date

Appendix B: Selection of Elements to Update for Gender Transition/Affirmation

Below is a list of elements that may need to be modified as a result of gender transition/affirmation. The list below is not exhaustive, nor does it address systems or data outside of NASA's control. You may wish to supplement this list with tasks engaged to support a newly onboarding employee before and during their first weeks of employment.

Office of the Chief Human Capital Officer (OCHCO)

- Federal Employee Health Benefit Election Form (FEHB): SF 2809
- Notice of Change in FEHB Enrollment: SF 2810
- Federal Employees Dental and Vision Insurance Program (FEDVIP): Dental and Vision
- Federal Employees' Group Life Insurance Program Election (FEGLI): SF 2817
- FEGLI Beneficiary: SF 2823
- NASA 24-Hour Personal Accident Enrollment Form
- Unpaid Compensation Beneficiary Form: SF 1152
- Civil Service Retirement System (CSRS) Designation of Beneficiary: SF 2808
- Federal Employees Retirement System (FERS) Designation of Beneficiary: SF 3102
- Thrift Saving Plan Election Form (TSP): TSP-1
- TSP Designation of Beneficiary: TSP-3
- Federal Flexible Spending Account Program (FSAFEDS)
- Federal Long-Term Care Insurance Program (FLTCIP)
- Office of Workers' Compensation Program (OWCP)

Office of Protective Services (OPS)

- Federal Employee Identification & PIV Credentials (Badge)
- Building Access (Cards and Keys)

Office of the Chief Financial Officer

- Government Travel Access
- Government Travel Credit Card

Office of Technology and Innovation

- Login name for all computer software systems, including initial login, Outlook, EPP, eOPF, WebTADS, HR Connect, inCompass, TLMS, and other system access
- Access to mobile device(s) and RSA token
- Change of email address, contact list, voicemail
- Updates to distribution lists, contact lists, POC lists
- Change of name and information listed on the Wiki

Local Office

- Notification of Personnel Action: SF-50
- Office Name Plate and Business Cards
- Local Transit Benefits

Appendix C: Sample Tools for Supervisors of Transitioning Employees

The following sample tools may assist supervisors when asked to announce gender transition/affirmation in the workplace. These are intended to only provide very high-level suggestions and general examples – specific communications should be customized based on the expressed wishes of the transitioning employee.

Suggested Talking Points

Supervisors may wish to include the following in announcements:

- The name and pronouns by which the transitioning employee should be addressed.
- The date after which the transitioning employee should be addressed by the name and pronouns.
- Names and contact information of resources who can answer questions about gender transition/affirmation at NASA, such as the Center ODEO, NSSC, Servicing HR Office, LGBTQ+ ERG, and/or EAP.

If the transitioning employee has explicitly expressed willingness to receive questions regarding their gender transition/affirmation, supervisors should inform staff that they can direct questions to the transitioning employee, as long as the discussion is respectful in tone and appropriate in content and context (the same as with any other employee).

Email Template for Supervisors

Sent: Monday, June XX, XXXX 8:00 AM
To: XXXXXXXX@nasa.gov
Subject: Staff change

Dear [NAME OF DIRECTORATE/OFFICE/BRANCH]:

I am writing to notify you that effective [DATE], the employee formerly known as [DEAD NAME] is to be referred to as [AFFIRMING NAME], with the use of [AFFIRMING PRONOUNS] as pronouns.

Leadership supports [AFFIRMING NAME] in their transition/affirmation, in accordance with NASA's policies on equal employment opportunity, diversity and inclusion, and anti-harassment. If you have questions or concerns, or if you need additional information, please consult [NAME OF SUPERVISOR] at [SUPERVISOR'S EMAIL AND PHONE NUMBER] or [NAME OF NSSC/SERVICING HR OFFICE REPRESENTATIVE], NSSC/Servicing HR Office representative, at [NSSC/SERVICING HR OFFICE REPRESENTATIVE'S EMAIL AND PHONE NUMBER].

If you are interested in learning more about how NASA supports gender transition/affirmation, I invite you to refer to the *NASA Guidance for Supporting Gender Transition/Affirmation in the Workplace* at [\[WEB SITE LOCATION\]](#). You may also contact the Center's LGBTQ+ Special Emphasis Program Manager (SEPM) in the Office of Diversity and Equal Opportunity (ODEO) at [\[LGBTQ+ SEPM PHONE NUMBER OR ODEO PHONE NUMBER\]](#) or reach out to the Center's LGBTQ+ Employee Resource Group at [\[LGBTQ+ ERG WEBSITE\]](#).