



May 2024

FEDERAL WORKFORCE

Leading Practices Related to Diversity, Equity, Inclusion, and Accessibility

GAO Highlights

Highlights of [GAO-24-106684](#), a report to congressional requesters

Why GAO Did This Study

As the nation’s largest employer, the federal government strives to be a model for DEIA, and to cultivate a workforce that draws from all segments of society. To this end, federal agencies are expected to establish and maintain a productive workforce that provides opportunities for all employees to excel. Such organizations typically foster a work environment in which people are enabled and motivated to aid mission accomplishment.

GAO was asked to identify leading practices and tools to advance DEIA. This report updates our 2005 leading diversity management practices and highlights key considerations that can help agencies advance DEIA in their workforces. Since 2005, GAO has continued to report on federal efforts to increase diversity in the workforce, ensure equity, enhance inclusive environments, and improve reasonable accommodations for people with disabilities.

GAO reviewed scholarly and peer-reviewed literature related to diversity management. GAO randomly selected 21 subject matter specialists that included, amongst others, individuals from federal, state, and local governments, for semi-structured interviews.

View [GAO-24-106684](#). For more information, contact Dawn G. Locke at (202) 512-6806, or locked@gao.gov.

May 2024










FEDERAL WORKFORCE

Leading Practices Related to Diversity, Equity, Inclusion, and Accessibility

This report presents GAO’s leading practices for diversity, equity, inclusion, and accessibility (DEIA) management and includes key considerations for implementing them (see table below). These practices can provide valuable insight and guidance for agencies to enhance their DEIA programs but are not meant to be all encompassing and are distinct from equal opportunity requirements under the law. GAO’s leading DEIA practices are interrelated, reinforce each other, and are not sequenced in any order.

Subject matter specialists and the literature generally agree that a combination of the nine identified practices should be considered when developing and implementing DEIA programs. GAO was told by all the subject matter specialists that top leadership commitment to DEIA sends a clear message about the seriousness and business relevance of DEIA. GAO has often emphasized that top leadership commitment is perhaps the single most important element in successful management improvement initiatives. Accountability provides a means for ensuring that managers at all levels are made responsible for DEIA in their organizations and are evaluated on their efforts to support DEIA initiatives. DEIA training includes organizational efforts to inform and educate management and staff about DEIA.

Leading Diversity, Equity, Inclusion, and Accessibility (DEIA) Practices and Selected Key Considerations

DEIA Leading Practice	Selected Key Considerations
 Top leadership commitment	<ul style="list-style-type: none"> Assign leadership and accountability for DEIA throughout the organization to managers and supervisors Dedicate resources for DEIA (i.e., staff, training, budget, and technology) Identify opportunities to support accessibility for employees
 DEIA as part of an organization's strategic plan	<ul style="list-style-type: none"> Complete a DEIA strategic plan with related objectives, time frames, and responsibilities and align with the agency strategic plan Monitor and report progress of DEIA initiatives and make course corrections
 Measurement	<ul style="list-style-type: none"> Collect, analyze, and report agency workforce demographic data Collect, analyze, and report employee views of DEIA Assess the equity of workplace policies and procedures
 Accountability	<ul style="list-style-type: none"> Establish and evaluate DEIA performance objectives for leaders, managers, and supervisors Recognize employees for progress on DEIA initiatives
 Succession planning	<ul style="list-style-type: none"> Create career roadmaps for employees Build a pipeline of qualified candidates identified for promotion Provide networking and mentoring programs
 Recruitment	<ul style="list-style-type: none"> Expand sources of recruitment Develop a recruitment strategy to support DEIA initiatives
 Employee involvement	<ul style="list-style-type: none"> Support employee resource groups Form workplace teams with employees of diverse backgrounds
 DEIA training	<ul style="list-style-type: none"> Provide training programs that focus on the benefits of DEIA Provide DEIA training (i.e., teambuilding, communication, and conflict resolution)
 Communication	<ul style="list-style-type: none"> Develop and implement communication strategies that support DEIA (i.e., newsletters, policy statements, speeches, and meetings) Use language that shows support for a diverse and inclusive workforce

Source: GAO analysis of relevant literature and interviews with subject matter specialists. GAO illustrations. | GAO-24-106684

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Abbreviations

DEIA	Diversity, Equity, Inclusion, and Accessibility
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
EO	Executive Order
FEVS	Federal Employee Viewpoint Survey
OMB	Office of Management and Budget
OPM	Office of Personnel Management
SES	Senior Executive Service

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May 23, 2024

The Honorable Jamie Raskin
Ranking Member
Committee on Oversight and Accountability
House of Representatives

The Honorable Gerald E. Connolly
House of Representatives

As the nation's largest employer with over 2.1 million non-postal civilian employees, the federal government strives to be a model for diversity, equity, inclusion, and accessibility (DEIA), and to cultivate a workforce that draws from all segments of society. To this end, federal agencies need to establish and maintain a productive workforce that provides opportunities for all employees to excel and add to the overall success of the organization.

We have previously reported that a high-performance organization relies on a dynamic workforce with the requisite talents, multidisciplinary knowledge, and up-to-date skills to ensure that it is equipped to accomplish its mission and achieve its goals.¹ A high-performance organization's approach toward its workforce is inclusive and draws on the strengths of employees at all levels and backgrounds. Such organizations also provide both accountability and fairness for all employees and typically foster a work environment in which people are enabled and motivated to contribute to continuous learning and improvement, as well as mission accomplishment.

You asked us to identify leading practices and tools to advance DEIA in the federal workforce. This report updates our 2005 leading diversity management practices and highlights key considerations that can help agencies advance DEIA in their workforces.² Since 2005, equity and accessibility have been identified as additional critical components to effective workforce diversity management. We have reported on federal efforts to increase diversity in the workforce, ensure equity, enhance

¹GAO, *Diversity Management: Expert-Identified Leading Practices and Agency Examples*, [GAO-05-90](#) (Washington, D.C.: Jan. 14, 2005).

²[GAO-05-90](#).

inclusive environments, and improve reasonable accommodations for people with disabilities.³

To examine whether and how our previously published diversity management practices have changed over time, and to identify whether and how to update these practices, we reviewed scholarly and peer-reviewed literature related to diversity management published from January 2017 through May 2022. We examined nearly 290 articles related to DEIA. Based on this literature search and suggestions from GAO stakeholders, we randomly selected 21 out of 80 subject matter specialists for semi-structured interviews. We conducted 11 semi-structured interviews with these 21 subject matter specialists in both group and individual interviews. These specialists included individuals from federal, state, and local governments; nonprofit U.S. and international organizations; the private sector; and academic institutions.

During these interviews, we gathered participants' views on their experiences researching, leading, or participating in diversity management efforts. We asked them to validate and update the leading practices identified in our 2005 report, as well as comment on key considerations we identified in our literature search. For reporting purposes, we developed the following indefinite quantifiers to describe collective responses from our 21 interviewees: "a few" is 3-5, "several" is 6-10, "most" is 11-20, and "all" is 21.

We shared our draft leading practices and key considerations with these specialists for their technical comments and views and incorporated their comments as appropriate. See appendix I for the list of individuals who advised us in our review of the practices and key considerations. Additionally, because the Office of Personnel Management (OPM) and the Equal Employment Opportunity Commission (EEOC) play key roles in federal human capital management, we spoke with officials from those agencies to obtain their perspectives.

We conducted this performance audit from March 2023 to May 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

³See the Related GAO Products page at the end of this report and *GAO, Federal Workforce: Strengthening Diversity, Equity, Inclusion, and Accessibility*, [GAO-23-106254](#) (Washington, D.C.: Jan. 24, 2023).

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

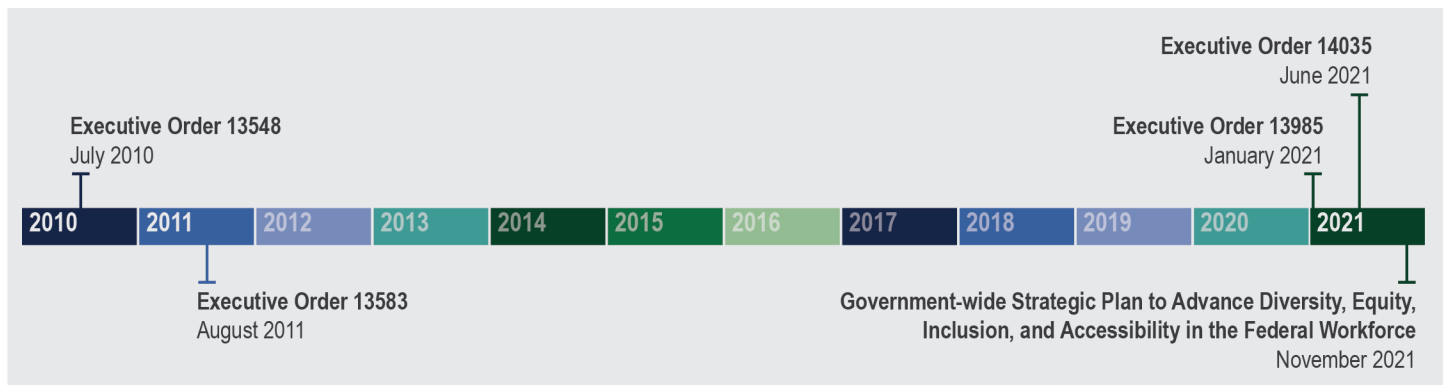
Background

Executive Order (EO) 14035, issued in June 2021, established a government wide initiative to promote DEIA in the Federal workforce (see fig. 1 for a listing of key Federal DEIA actions).⁴ The EO established a government-wide initiative to advance DEIA in federal hiring and employment practices. Among other things, the EO charges all agencies with assessing the current state of DEIA within their workforces and developing strategic plans to eliminate any barriers to DEIA in the workforce. OPM and the Office of Management and Budget (OMB), in partnership with the White House and EEOC, are tasked with leading the initiative.

Executive Orders and Guidance

The executive branch has directed the government's efforts to apply DEIA practices throughout the federal workforce. A timeline of key federal DEIA actions since 2010 is shown in figure 1.

Figure 1: Timeline of Key Federal Diversity, Equity, Inclusion, and Accessibility (DEIA) Actions Since 2010



Source: GAO. | GAO-24-106684

Note: The Executive Order titles are Exec. Order No. 13548, *Increasing Federal Employment of Individuals with Disabilities*; Exec. Order No. 13583, *Establishing a Coordinated Government-Wide Initiative to Promote Diversity and Inclusion in the Federal Workforce*; Exec. Order No. 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*; and Exec. Order No. 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*.

⁴Exec. Order No. 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86 Fed. Reg. 34593, 34594-96 (June 30, 2021).

The EOs and guidance depicted in figure 1 include the following:

- **Executive Order 13548.** This July 2010 EO emphasizes that, as the nation's largest employer, the federal government must become a model for the employment of individuals with disabilities and engage in efforts to increase the recruitment, hiring, and retention of people with disabilities.⁵
- **Executive Order 13583.** Issued in 2011, this EO establishes the government-wide diversity and inclusion strategic plan. It also directs all executive departments and agencies to develop and implement a more comprehensive, integrated, and strategic focus on diversity and inclusion as a key component of their respective human resources strategies.⁶
- **Executive Order 13985.** Issued in January 2021, this EO directs the head of each federal agency to review certain agency programs and policies to assess whether underserved communities face barriers in accessing benefits and to ensure that government programs are designed to serve all eligible individuals. It also directs agencies to consult with OMB to produce a plan to address these barriers.⁷
- **Executive Order 14035.** Issued in June 2021, this EO expands on EO 13583 and directs a government-wide initiative to cultivate a federal workforce that draws from the full diversity of the nation. This initiative also advances equitable and accessible employment opportunities and requires the development and issuance of a government-wide DEIA strategic plan. It also requires federal agencies to provide resources to implement their strategic plans and report annually on progress.
- **Government-wide Strategic Plan to Advance DEIA in the Federal Workforce.** Issued in November 2021, the government-wide DEIA strategic plan provides a roadmap for implementing EO 14035 and

⁵Exec. Order No. 13548, *Increasing Federal Employment of Individuals with Disabilities*, 75 Fed. Reg. 45039 (July 30, 2010).

⁶Exec. Order No. 13583, *Establishing a Coordinated Government-Wide Initiative to Promote Diversity and Inclusion in the Federal Workforce*, 76 Fed. Reg. 52847 (Aug. 23, 2011).

⁷Exec. Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, 86 Fed. Reg. 7009 (Jan. 25, 2021).

lays out key steps agencies can take to strengthen DEIA in their workforce policies, practices, and culture.⁸

Definitions for Diversity, Equity, Inclusion, and Accessibility

Diversity management is an organizational process used to achieve the benefits associated with DEIA in the workplace. For purposes of this work, we used definitions for each of these terms from EO 14035 (see fig. 2).

Figure 2: Definitions of Diversity, Equity, Inclusion, and Accessibility

DIVERSITY

The practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities.

EQUITY

The consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.

INCLUSION

The recognition, appreciation, and use of the talents and skills of employees of all backgrounds.

ACCESSIBILITY

The design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them.

Source: GAO analysis of Executive Order 14035. | GAO-24-106684

Note: Accessibility includes the provision of accommodations and modifications to ensure equal access to employment and participation in activities for people with disabilities, the reduction or elimination of physical and attitudinal barriers to equitable opportunities, a commitment to ensuring that people with disabilities can independently access every outward-facing and internal activity or electronic space, and the pursuit of best practices such as universal design.

⁸White House, *Government-Wide Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce* (November 2021).

Federal Leadership for DEIA

OPM serves as the chief human resources agency and personnel policy manager for the federal government. EEOC is responsible for enforcing federal equal employment opportunity laws and has additional oversight responsibility for equal employment opportunity policies and processes in the federal sector. Both OPM and EEOC have responsibilities related to DEIA for the federal workforce.⁹ The Deputy Director for Management of OMB shares leadership responsibility with the Director of OPM for the implementation of the *Government-wide Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*.¹⁰

OPM. OPM's mission is to lead and serve the federal government in human resource management, including providing policies and services to achieve a trusted and effective federal workforce. OPM also plays a leadership role in supporting agencies in advancing DEIA efforts. This includes supporting the development of government-wide diversity strategic plans in 2011, 2016, and 2021.¹¹ According to OPM, its Office of Diversity, Equity, Inclusion, and Accessibility provides agencies with concrete strategies and best practices to recruit, hire, include, develop, retain, engage, and motivate a diverse, results-oriented, high-performing workforce. OPM also reports on diversity-related analysis and employment trends. For example, OPM is responsible for annual reports to Congress on progress under the Federal Equal Opportunity

⁹Other agencies, besides OPM, also play a role in supporting DEIA policies and processes for the federal workforce. See Exec. Order No. 14035, 86 Fed. Reg. 34593, 34594 (June 30, 2021), which provides "Government-Wide Diversity, Equity, Inclusion, and Accessibility Initiative and Strategic Plan. The Director of the Office of Personnel Management (OPM) and the Deputy Director for Management of the Office of Management and Budget (OMB)—in coordination with the Chair of the Equal Employment Opportunity Commission (EEOC) and in consultation with the Secretary of Labor, the Director of the Office of Science and Technology Policy, the Assistant to the President for National Security Affairs, the Assistant to the President for Domestic Policy (APDP), the Director of the National Economic Council, and the Co-Chairs of the Gender Policy Council—shall: (a) reestablish a coordinated Government-wide initiative to promote diversity and inclusion in the Federal workforce..."

¹⁰Executive Order 14035, 86 Fed. Reg. 34593 (June 30, 2021); The White House, *Government-Wide Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce* (Nov. 2021).

¹¹Office of Personnel Management, *Government-Wide Diversity and Inclusion Strategic Plan (2011) and Government-wide Inclusive Diversity Strategic Plan* (July 2016); White House, *Government-Wide Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce* (November 2021).

Recruitment Program and on Hispanic employment in the federal government.¹²

EEOC. EEOC’s mission is to prevent and remedy unlawful employment discrimination and advance equal opportunity for all. The laws enforced by EEOC apply for both federal civilian employees and most other workers in the United States. The EEOC also provides leadership and guidance to federal agencies on all aspects of the federal government’s equal employment opportunity program. In addition, *Executive Order 14035 on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce* tasks EEOC with several responsibilities to support DEIA government-wide.¹³ For example, in conjunction with the Director of OPM, the Chair of the EEOC is to issue guidance and serve as a resource and repository for best practices for agencies to develop or enhance existing DEIA training programs, among other things.

Leading DEIA Practices and Key Considerations

This report presents our leading practices for DEIA management and includes key considerations for implementing them (see fig. 3).¹⁴ These practices can provide valuable insight and guidance for agencies to enhance their DEIA programs. These practices are not meant to be all encompassing and are distinct from equal employment opportunity requirements under the law.¹⁵

While we found that our leading diversity management practices, issued in 2005, remain valid, we included one new practice and updated the language in the others. The new leading practice, “Communication,” was prominent in the literature and most subject matter specialists identified it as critical to effective DEIA. On the other hand, we eliminated the “diversity linked to performance” practice based on our literature review results and discussions with subject matter specialists. However, we included an aspect of the eliminated practice, meeting the needs of a

¹²See 5 U.S.C. § 7201; 5 C.F.R. § 720.207; Exec. Order No. 13171, *Hispanic Employment in the Federal Government*, 65 Fed. Reg. 61251 (Oct. 16, 2000).

¹³Exec. Order No. 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86 Fed. Reg. 34593 (June 30, 2021).










¹⁴[GAO-05-90](#).

¹⁵Equal employment opportunity (EEO) focuses on those groups protected by law from employment discrimination. Federal EEO laws prohibit employment discrimination on the basis of race, color, religion, sex, national origin, age, disability, and genetic information. See, e.g., 42 U.S.C. §§ 2000e-16, 2000ff-1; 29 U.S.C. §§ 633a, 791, 794. DEIA efforts, like any employment action, must be consistent with federal EEO laws.

diverse customer base, as a key consideration under the “measurement” practice.

We also added key considerations to each practice to help facilitate implementation of the practice. Key considerations include strategies, tools, activities, or actions that organizations may pursue to drive progress implementing one or more practices. While we have defined and organized the practices individually, they are interrelated and reinforce each other and are not sequenced in any order.

Figure 3: Leading Diversity, Equity, Inclusion, and Accessibility (DEIA) Practices and Key Considerations

DEIA Leading Practice	Key Considerations
 <p>Top leadership commitment—a vision of DEIA demonstrated throughout an organization by top-level management.</p>	<ul style="list-style-type: none"> • Identify a chief diversity officer or champion to lead DEIA efforts • Assign leadership and accountability for DEIA throughout the organization to managers and supervisors • Dedicate resources for DEIA (i.e., staff, training, budget, and technology) • Identify opportunities to support accessibility for employees
 <p>DEIA as part of an organization’s strategic plan—a DEIA strategy and plan that is developed and aligned with the organization’s strategic plan.</p>	<ul style="list-style-type: none"> • Complete a DEIA strategic plan with related objectives, time frames, and responsibilities and align with the agency strategic plan • Monitor and report progress of DEIA initiatives and make course corrections • Coordinate the roles and responsibilities related to DEIA across the organization
 <p>Measurement—a set of quantitative and qualitative measures of the impact of an overall DEIA program.</p>	<ul style="list-style-type: none"> • Collect, analyze, and report agency workforce demographic data • Collect, analyze, and report employee views of DEIA • Collect, analyze, and report data on customer experience related to DEIA • Assess the equity of workplace policies and procedures
 <p>Accountability—the means to ensure that leaders and managers are responsible for DEIA by linking their performance assessment to the progress of diversity initiatives.</p>	<ul style="list-style-type: none"> • Establish and evaluate DEIA performance objectives for leaders, managers, and supervisors • Include performance evaluators from diverse backgrounds and incorporate their views into performance management processes • Recognize employees for progress on DEIA initiatives
 <p>Succession planning—an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization’s potential future leaders.</p>	<ul style="list-style-type: none"> • Create career roadmaps for employees • Build a pipeline of qualified candidates identified for promotion • Provide networking and mentoring programs
 <p>Recruitment—the process of attracting a supply of qualified, diverse applicants for employment.</p>	<ul style="list-style-type: none"> • Expand sources of recruitment • Develop a recruitment strategy to support DEIA initiatives
 <p>Employee involvement—the contribution of employees in driving DEIA throughout an organization.</p>	<ul style="list-style-type: none"> • Support employee resource groups • Form workplace teams with employees of diverse backgrounds
 <p>DEIA training—organizational efforts to inform and educate management and staff about DEIA.</p>	<ul style="list-style-type: none"> • Provide training programs that focus on the benefits of DEIA • Provide DEIA training (i.e., teambuilding, communication, and conflict-resolution) • Assess effectiveness of DEIA training and modify as necessary
 <p>Communication—communicate the organization’s support for DEIA.</p>	<ul style="list-style-type: none"> • Develop and implement communication strategies that support DEIA (i.e., newsletters, policy statements, speeches, and meetings) • Use language that shows support for a diverse and inclusive workforce • Report status of DEIA efforts to organization and stakeholders (i.e., Congress and agency employees)

Source: GAO analysis of relevant literature and interviews with subject matter specialists. GAO illustrations. | GAO-24-106684

Note: GAO’s update to its DEIA leading practices includes the addition of “Communication” as a leading practice and the deletion of “Diversity linked to Performance” as a leading practice. In addition, GAO updated the language describing its leading practices and included “Key Considerations” to help facilitate implementation of the practices.

The following sections describe each leading DEIA practice and the corresponding key considerations that help support each practice.

Top Leadership Commitment

Top leadership commitment—a vision of DEIA demonstrated throughout an organization by top-level management



Key considerations

- Identify a chief diversity officer or champion to lead DEIA efforts
 - Assign leadership and accountability for DEIA throughout the organization to managers and supervisors
 - Dedicate resources for DEIA (i.e., staff, training, budget, and technology)
 - Identify opportunities to support accessibility for employees
-

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

We have often emphasized that top leadership commitment is perhaps the single most important element in successful management improvement initiatives.¹⁶ This includes successfully implementing DEIA initiatives. All the subject matter specialists we spoke with told us that demonstrating leadership commitment to DEIA can send a clear message about the seriousness and business relevance of DEIA. The following key considerations help agencies to support the practice of top leadership commitment.

Identify a chief diversity officer or champion to lead DEIA efforts. A chief diversity officer communicates the organization’s support for diversity by articulating a vision and reinforcing DEIA principles across the organization. According to relevant literature and all subject matter specialists we interviewed, leaders and managers within organizations are responsible for the success of diversity management because they provide visibility to DEIA through their direct involvement. All the subject matter specialists we interviewed emphasized the importance of a dedicated chief diversity officer to lead agency-wide DEIA efforts.

Assign leadership and accountability for DEIA throughout the organization to managers and supervisors. It is also critical to identify DEIA champions throughout the organization and assign accountability to help achieve agency DEIA goals. All the subject matter specialists we spoke with agreed that spreading responsibility for DEIA at all levels of an

¹⁶GAO, *Government Reorganization: Key Questions to Assess Agency Reform Efforts*, GAO-18-427 (Washington, D.C.: June 13, 2018); GAO-05-90; and GAO, *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, GAO-03-669 (Washington, D.C.: July 2, 2003).

organization is a way to help build support for DEIA programs and policies and maintain momentum. Several interviewees told us that including supervisors, managers, and employee groups in DEIA efforts helps to sustain a culture that supports DEIA and reinforces the importance of these initiatives.

Dedicate resources for DEIA (i.e., staff, training, budget, and technology). Most of the subject matter specialists and practitioners we spoke with told us that leaders can provide further support for DEIA initiatives by dedicating resources to build organizational capacity for DEIA. They said the resources help build momentum and organizational capacity for the implementation of successful DEIA. Resources include staff throughout the organization to support DEIA, as well as DEIA training and technologies that support an accessible work environment.

Identify opportunities to support accessibility for employees. We previously reported that top leadership is key to implementing and sustaining improvements for employees with disabilities.¹⁷ Supporting accessible and flexible working conditions, such as providing technological and physical support and modifying work schedules, can help provide the pathway for recruiting and retaining current and future employees with disabilities. According to relevant literature, the designation of a disability champion helps to sustain accessibility efforts consistently across an organization. Additionally, according to relevant literature and two subject matter specialists we interviewed, evaluating each stage of the human capital lifecycle can pinpoint areas of program and policy concern and provide opportunities to make improvements for employees with disabilities. These efforts can help ensure that all employees, regardless of disability status, are able to access their agency's technology, facilities, and programs.

¹⁷GAO, *Highlights of a Forum: Participant-Identified Leading Practices That Could Increase the Employment of Individuals with Disabilities in the Federal Workforce*, [GAO-11-81SP](#) (Washington, D.C.: Oct. 5, 2010).

DEIA as Part of an Organization's Strategic Plan

DEIA as part of an organization's strategic plan—a DEIA strategy and plan that is developed and aligned with the organization's strategic plan.



Key considerations:

- Complete a DEIA strategic plan with related objectives, time frames, and responsibilities and align with the agency strategic plan
- Monitor and report progress of DEIA initiatives and make course corrections
- Coordinate the roles and responsibilities related to DEIA across the organization

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

We have previously reported that an agency's strategic planning effort is the foundation for defining what the agency seeks to accomplish, identifying the strategies it will use to achieve desired results, and then determining how well it succeeds in reaching its goals and achieving objectives.¹⁸ Strategic planning efforts to achieve DEIA initiatives require the same approach. Integrating DEIA into an organization's strategic plan fosters a culture that supports and values differences. The following key considerations help agencies to support the practice of including DEIA in an organization's strategic plan.

Complete a DEIA strategic plan with related objectives, time frames, and responsibilities and align with the agency strategic plan. As discussed earlier, *Executive Order 14035 on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce* requires OMB and OPM—in coordination with EEOC—to develop and issue a government-wide DEIA strategic plan.¹⁹ Furthermore, Executive Order 14035 directs agencies to implement the government-wide DEIA strategic plan. It also directs agencies to develop DEIA agency strategic plans to advance DEIA in their workforces, provide resources to implement their strategic plans, and submit them to OMB and OPM to report progress toward these goals, among other things. As noted above, in November 2021, the White House released a government-wide strategic plan to advance DEIA in the

¹⁸GAO, *Agencies' Strategic Plans Under GPRA: Key Questions to Facilitate Congressional Review (Version 1)*, GGD-10.1.16 (Washington, D.C.: May 1, 1997).

¹⁹Exec. Order No. 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86 Fed. Reg. 34593 (June 25, 2021).

federal workforce.²⁰ This plan offered a roadmap to agencies for implementing the executive order and laid out key steps they can take to strengthen DEIA in their workforce policies, practices, and culture. Most interviewees told us that strategic DEIA plans communicate actionable steps to external and internal stakeholders, such as Congress and agency employees, to embed DEIA into the organization directly (such as accessibility). Organizations are then able to hold individuals and groups accountable and to review progress more accurately toward these goals. According to EEOC officials, DEIA-related initiatives should be flexible and should not be related to demographic quotas.

Monitor and report progress of DEIA initiatives and make course corrections. Monitoring and reporting progress toward DEIA goals, to Congress and agency employees, is another way that agencies can demonstrate accountability, communicate the status of their efforts, and make course corrections as needed. We have previously reported in our body of work on strategic planning that leading organizations monitor their internal environments continuously and systematically.²¹ Monitoring helps organizations anticipate challenges and make adjustments so that potential problems do not become crises. In addition, according to relevant literature and several of the subject matter specialists we interviewed, reporting progress on DEIA efforts (whether that information is positive or negative) is important to maintaining transparency and credibility with an agency's internal and external stakeholders.

Coordinate the roles and responsibilities related to DEIA across the organization. We have previously reported that better coordination of roles and responsibilities related to employment of all groups, including employees with disabilities within and across the agency as a whole, is critical to improving federal workforce outcomes.²² Yet responsibilities related to employment of individuals with disabilities are often dispersed among departments, within the organization such as the civil rights/EEO office, the human capital office, the office of workers' compensation, the IT department, and others. When agencies decentralize responsibilities without careful coordination, they can create barriers to hiring, providing reasonable accommodations, evaluating results of agency efforts, and other processes. For example, barriers can be created if one party defers

²⁰The White House, *Government-wide Strategic Plan to Advance Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce* (November 2021).

²¹See *Managing for Results in Government* | U.S. GAO.

²²[GAO-11-81SP](#).

action, thinking that it is someone else's responsibility. About half of the subject matter specialists we interviewed agreed that it was critical to coordinate responsibilities across an organization to better implement efficient and effective implementation of DEIA and achieve desired outcomes.

Measurement

Measurement—a set of quantitative and qualitative measures of the impact of an overall DEIA program.



Key considerations:

- Collect, analyze, and report agency workforce demographic data
- Collect, analyze, and report employee views of DEIA
- Collect, analyze, and report data on customer experience related to DEIA
- Assess the equity of workplace policies and procedures

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

Performance measurement is the systematic ongoing monitoring and reporting of program accomplishments, particularly progress toward preestablished goals or standards. Our work in designing program evaluations discusses the importance of performance measurement and reporting and how measures can be used to gauge progress in meeting desired outcomes.²³ To help achieve an agency's desired DEIA organizational outcomes, it is critical to collect data and track progress toward those outcomes using a variety of measures. The following key considerations help agencies to support the measurement practice.

Collect, analyze, and report agency workforce demographic data.

According to the literature and most of the subject matter specialists we interviewed, periodically examining agency workforce demographic data allows leadership to track progress toward their goals in maintaining a diverse workforce and how such efforts lead to improved agency outcomes. Any DEIA-related numerical tracking should only focus on identifying barriers to supporting DEIA in the workforce and should not be used for creating goals for demographic quotas. Research has found that a diverse workforce can help managers better understand and address the needs of a demographically diverse employee population and agency customer base. They can also be beneficial in solving complex problems and lead to better performance. Moreover, when agencies understand the

²³GAO, *Designing Evaluations: 2012 Revision*, [GAO-12-208G](#) (Washington, D.C.: January 2012).

demographic makeup of their workforce, they can look for trends in attrition to better plan for succession management and track retirement in key positions.

Collect, analyze, and report employee views of DEIA. We previously reported that increased levels of engagement—generally defined as the sense of purpose and commitment employees feel toward their employer and its mission—can lead to better organizational performance.²⁴

Collecting and analyzing engagement information from employees can help an agency determine if its DEIA efforts are having the desired effects. To examine how employees view DEIA, agencies can use their Federal Employee Viewpoint Survey (FEVS) results. This is an organizational climate survey, administered by OPM, that assesses how employees experience the policies, practices, and procedures characteristic of their agency and its leadership. Agencies can analyze the results to assess how their DEIA initiatives are progressing. As of 2022, OPM's FEVS includes a specific DEIA index that agencies can use to better understand each of the four components of DEIA—diversity, equity, inclusion, and accessibility. Agencies can review their DEIA survey results to help identify their current state and assess changes that may be needed for addressing potential challenges, implementing future DEIA initiatives, and enhancing positive results.

Collect, analyze, and report data on customer experience related to DEIA. In focusing on agency performance and improvement, the GPRA Modernization Act of 2010 requires that agencies establish a balanced set of performance indicators to be used in measuring progress toward performance goals, including, as appropriate, goals for customer service.²⁵ Additionally, various presidential administrations have issued executive orders and guidance related to improving agency customer service and customer experience.²⁶ A key aspect of serving customers effectively is to recognize the diversity of the federal customer base and

²⁴GAO, *Federal Workforce: Additional Analysis and Sharing of Promising Practices Could Improve Employee Engagement and Performance*, [GAO-15-585](#) (Washington, D.C.: July 14, 2015).

²⁵Pub. L. No. 111-352, § 3, 124 Stat. 3866, 3868-69 (2011) codified at 31 U.S.C. § 1115.

²⁶See Exec. Order No. 13571, *Streamlining Service Delivery and Improving Customer Service*, 76 Fed. Reg. 24339 (May 2, 2011); OMB, *Implementing Executive Order 13571 on Streamlining Service Delivery and Improving Customer Service*, Memorandum M-11-24 (June 13, 2011); and Exec. Order No. 14058, *Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government*, 86 Fed. Reg. 71357 (Dec. 16, 2021).

identify and meet specific needs for a wide range of customers. We previously reported that DEIA makes good business sense as it enhances productivity and innovation and could help an organization expand services to meet the needs of a more diverse customer base.²⁷ Several subject matter specialists we spoke with told us it is important for any organization to collect and analyze data on customer experience related to DEIA to help improve individual and organizational performance.

Assess the equity of workplace policies and procedures. Conducting an equity assessment of policies, procedures, and programs helps to determine if some policies and procedures affect various groups differently or could have unintended consequences. Equity assessments aim to minimize unintended adverse outcomes and maximize opportunities and positive outcomes. According to the literature we reviewed and several subject matter specialists, agencies should review organizational policies and procedures to ensure equity across all groups. For example, agencies can take steps to periodically review job classifications and position descriptions to ensure equity across series and grade levels. Agencies can also review how much employees are paid and who is being promoted and take action to address disparities.

Accountability

Accountability—the means to ensure that leaders and managers are responsible for DEIA by linking their performance assessment to the progress of diversity initiatives.



Key considerations:

- Establish and evaluate DEIA performance objectives for leaders, managers, and supervisors
- Include performance evaluators from diverse backgrounds and incorporate their views into performance management processes
- Recognize employees for progress on DEIA initiatives

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

We have previously pointed to the importance of holding managers accountable for contributing to the achievement of an organization's strategic goals through performance management and rewards systems.²⁸ Accountability provides a means for ensuring that managers at all levels are made responsible for DEIA in their organizations and

²⁷GAO-05-90.

²⁸GAO, *Results-Oriented Government: GPRA Has Established a Solid Foundation for Achieving Greater Results*, GAO-04-38 (Washington, D.C.: Mar. 10, 2004).

evaluated on their progress toward achieving their DEIA goals and their ability to manage a diverse group of employees. The following key considerations help agencies to support the accountability practice.

Establish and evaluate DEIA performance objectives for leaders, managers, and supervisors. By establishing DEIA-related performance measures, leaders, managers, and supervisors can gauge their progress in meeting individual DEIA and organizational goals. Recognizing that an agency's people are vital assets, an organization may link managers' performance ratings and compensation to supporting progress on DEIA initiatives. OPM's regulations on Senior Executive Service (SES) performance management call for appraisal of executives using measures that balance organizational results with employee perspectives.²⁹ According to documents we reviewed, embedded within Leading People, one of the five executive core qualifications used to assess SES members, is "leveraging diversity." This is defined as an executive who "fosters an inclusive workplace where diversity and individual differences are valued and leveraged to achieve the vision and mission of the organization, which is part of one mechanism that can hold leaders accountable for DEIA goals."³⁰

Further, most of the subject matter specialists we interviewed told us it was important for organizations to ensure that their leaders and managers have DEIA performance objectives in place and to regularly evaluate them based on how well they are achieving those objectives. One of the subject matter specialists we spoke with noted that employees need to know DEIA is a value and that newer and more seasoned employees will be held accountable for these values.

Include performance evaluators from diverse backgrounds and incorporate their views into performance management processes. Most of the subject matter specialists we spoke with noted that, in addition to tracking individual performance, one way that organizations can hold themselves accountable for DEIA progress is by including performance evaluators that reflect the overall demographic composition of the staff involved. Doing so allows varied perspectives in measuring employee performance and contributes to the perception of fairness throughout the organization. EEOC officials pointed out that the

²⁹5 C.F.R. § 430.301(b)(5).

³⁰OPM, *Guide to Senior Executive Service Qualifications* (September 2012).

demographic composition of evaluators is not a rigid requirement, and the selection of evaluators should be made in accordance with EEO laws.

Recognize employees for progress on DEIA initiatives. *Standards for Internal Control in the Federal Government* stress that management designs a performance evaluation and feedback system, supplemented by an effective rewards system, to help employees understand the connection between their performance and the entity's success.³¹ To that end, rewarding and recognizing efforts for supporting DEIA initiatives communicates that DEIA is valued by the organization. Several subject matter specialists we interviewed noted that recognition for DEIA accomplishments can help create a culture of inclusiveness that encourages employees to participate and continue their efforts. Additionally, a few interviewees noted that the recognition of diversity of thought and ideas is especially important because solving many of government's most intractable and complex problems requires a wide range of perspectives and ideas.

Succession Planning

Succession Planning—an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization's potential future leaders.



Key considerations:

- Create career roadmaps for employees
- Build a pipeline of qualified diverse candidates identified for promotion
- Provide networking and mentoring programs

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

We have previously reported that effective succession planning can help agencies ensure they have a pipeline of talent to meet current and future mission requirements.³² Succession planning is a comprehensive, ongoing strategic process that involves forecasting an organization's senior leadership needs; identifying and developing candidates who have the potential to be future leaders; and selecting individuals from among a diverse pool of qualified candidates to meet the organization's mission over the long term. In our previous report on diversity management, we stated that succession planning is also tied to the federal government's

³¹GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

³²GAO, *Human Capital: Insights for U.S. Agencies from Other Countries' Succession Planning and Management Initiatives*, [GAO-03-914](#) (Washington, D.C.: Sept. 15, 2003).

opportunity to change the diversity of the senior executive corps through new appointments.³³ We also reported that agencies in other countries use succession planning and management to achieve a more diverse workforce, maintain their leadership capacity, and increase the retention of high-potential staff.³⁴ The following key considerations help support the practice of succession planning.

Create career roadmaps for employees. To increase employee retention and support career development, leading organizations go beyond a “replacement” approach. Instead, they focus on defining career trajectories for staff and identifying individuals as possible successors for specific organizational needs, including mid- and top-level management positions. Further, these organizations engage in broad, integrated succession planning and management efforts that focus on strengthening both current and future capacity. These organizations anticipate the need for leaders and other key employees with the necessary competencies to successfully meet complex challenges. Several of the subject matter specialists we interviewed agreed that it is necessary to create career roadmaps for staff that clearly articulate steps for promotion and advancement for all types of positions within an agency to build and maintain a diverse workforce. For example, developing a specific roadmap of how employees can move from one position to another is critical, as it is not always known to all employees how to make the transition to higher level positions.

Build a pipeline of qualified diverse candidates identified for promotion. Succession planning also is tied to the federal government’s opportunity to change the diversity of the executive corps through new appointments. We previously reported that the federal government faces large losses in its SES, primarily through retirement but also because of normal attrition.³⁵ Our work has shown that federal agencies will need to enhance their efforts to improve workforce diversity as current SES staff retire.³⁶ Our prior work and several of the subject matter specialists stated

³³[GAO-05-90](#).

³⁴[GAO-03-914](#).

³⁵[GAO-05-90](#).

³⁶GAO, *Human Capital: Insights for U.S. Agencies from Other Countries’ Succession Planning and Management Initiatives*, [GAO-03-914](#) (Washington, D.C.: Sept. 15, 2003).

that an organization needs to develop a pipeline of diverse new staff, including leaders, to succeed in addressing challenges of the future.³⁷

Provide networking and mentoring programs. Most of the subject matter specialists we spoke with told us that to help retain and develop staff, leading organizations should provide networking and mentoring programs, among other supportive professional development opportunities. Several subject matter specialists told us that retention and promotion efforts for underserved communities can be bolstered by career development programs. For example, a few subject matter specialists reinforced the value of employee resource groups, including, as appropriate, reskilling of employees. Reskilling can increase retention and provide new skills to help employees achieve their mission goals while also reducing turnover. Career development resources, such as reskilling and mentorship also help employees to move within the organization and find a career path that is beneficial for them and the organization.

Recruitment

Recruitment—the process of attracting a supply of qualified, diverse applicants for employment.



Key considerations:

- Expand sources of recruitment
- Develop a recruitment strategy to support DEIA initiatives

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

Recruitment is a key process by which federal agencies attract a supply of qualified, diverse applicants for employment. It is the first step toward establishing a diverse workforce and a key part of workforce planning. *Standards for Internal Control in the Federal Government* stress that management should consider how best to retain valuable employees, plan for their eventual succession, and ensure continuity of needed skills and abilities.³⁸

We were told by several subject matter specialists that recruitment should be focused on organizational needs, which, in many cases, benefit from a diverse pool of candidates. We previously reported that implementing workforce planning practices can facilitate the analysis of gaps between current skills and future needs and the development of strategies for filling

³⁷[GAO-05-90](#).

³⁸[GAO-14-704G](#).

the potential gaps. It can also help agencies with succession planning.³⁹ As more federal employees become eligible for retirement, recruitment will help address potential personnel shortages. The following key considerations can help support the recruitment practice.

Expand sources of recruitment. Federal agencies tend to recruit at colleges or universities; but, according to our prior work and some subject matter specialists, they can benefit by expanding sources of recruitment to trade organizations, different sectors or levels of government, and community organizations. Most of the subject matter specialists we spoke with agreed that expanding sources of recruitment will benefit agencies' efforts to increase diversity in hiring a wide range of employees. They also said agencies should consider options for recruitment that allow for broader reach, such as targeted recruitment in diverse communities, multilingual outreach, and paid internships. For example, several subject matter specialists noted that paid internships can provide a variety of socio-economic groups with more equitable access to career opportunities.

Develop a recruitment strategy to support DEIA initiatives.

Developing, implementing, and updating recruitment strategies can further help agencies achieve their DEIA strategic goals, while building capacity to achieve the organization's mission. Most subject matter specialists emphasized the value of developing a recruitment strategy linked to the organization's DEIA strategic plan. They also said drawing upon organizational capabilities and resources are needed to implement their recruitment strategy.

³⁹GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning* [GAO-04-39](#) (Washington DC. Dec. 11, 2003).

Employee involvement—the contribution of employees in driving DEIA throughout an organization.



Key considerations:

- Support employee resource groups
- Form workplace teams with employees of diverse backgrounds

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

We previously reported on the importance of empowering and involving employees to help agencies achieve their goals and improve government operations. We identified key practices that help empower and involve employees.⁴⁰ A critical aspect of implementing DEIA is to involve employees in such efforts and provide opportunities for them to contribute to driving diversity and inclusion throughout an organization.⁴¹ The following key considerations help support the practice of employee involvement.

Support employee resource groups. Employees may become involved in diversity management efforts by forming resource groups, including task forces, councils, boards, and networks (also called advisory, advocacy, support, or affinity groups). These groups can identify issues, recommend actions, and help develop initiatives. As we previously reported, organizations can establish advisory groups that include representatives from a diverse range of employees.⁴² In addition, most subject matter specialists told us that employee resource groups can help to develop and retain newer employees and support employees' professional development, among other purposes. Several subject matter specialists also told us the groups can benefit from the involvement of leaders and experienced employees.

Form workplace teams with employees of diverse backgrounds. We previously reported that using employee teams in planning efforts can help accomplish agency missions and improve performance.⁴³ Specifically, to gain employee viewpoints and improve inclusivity in decision-making, adopting a teams-based approach to operations can

⁴⁰GAO, *Human Capital: Practices That Empowered and Involved Employees*, GAO-01-1070 (Washington, D.C.: Sept. 14, 2001).

⁴¹GAO-05-90.

⁴²GAO-05-90.

⁴³GAO-01-1070.

improve employee morale and job satisfaction by creating an environment characterized by open communication, enhanced flexibility in meeting job demands, and a sense of shared responsibility for accomplishing agency goals and objectives.

Using diverse teams can also assist in integrating different perspectives, flattening organizational structure, and streamlining operations. Most of the subject matter specialists told us that organizations can support DEIA efforts and goal achievement by forming diverse teams to gather their viewpoints, improve decision-making, and make appropriate updates to organizational policies, guidance, and procedures. For example, a few subject matter specialists told us that by including diverse employee perspectives and ideas in decision-making, organizations may be better prepared to serve their customers and address many of their most intractable and complex challenges.

DEIA Training

DEIA Training—organizational efforts to inform and educate management and staff about DEIA.



Key considerations:

- Provide training programs that focus on the benefits of DEIA
- Provide DEIA training (i.e., teambuilding, communication, and conflict-resolution)
- Assess effectiveness of DEIA training and modify as necessary

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

We previously reported that agencies can build their fundamental management capabilities by investing in training to ensure that employees have the information, skills, and competencies they need to work effectively in a rapidly changing and complex environment.⁴⁴ Effective training and development programs are an integral part of a learning environment that can enhance the federal government's ability to attract and retain employees with the skills and competencies needed to achieve results. Such training efforts are key to DEIA initiatives to help staff develop concrete skills to assist them in communicating and increasing productivity and support their understanding of the benefits of DEIA for their agency. The following key considerations help support the practice of DEIA training.

⁴⁴GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: Mar. 1, 2004).

Provide training programs that focus on the benefits of DEIA.

According to the 2021 *Government-Wide Strategic Plan to Advance Diversity, Equity, Inclusion, And Accessibility In The Federal Workforce*, agencies should undertake efforts to expand the availability of DEIA training so that federal employees are supported and have the tools to promote respectful and inclusive workplaces.⁴⁵ We previously reported that diversity training, throughout the organization, can help management and staff increase their awareness and understanding of DEIA within the workplace.

DEIA training can also help them develop concrete skills to assist them in communicating and increasing productivity. Such training can provide employees with an awareness of their differences—including work styles such as more formal and informal ways of making presentations—and an understanding of how leveraging a range of perspectives and skills can improve organizational performance. Several subject matter specialists noted that DEIA training should be motivating for everyone and help showcase how a diverse workplace can better achieve organizational goals. According to literature we reviewed, an effective diversity training program can help retain employees of different backgrounds by making them aware of rules and regulations, supporting employees' career paths, and facilitating employees' performance improvement.

Provide DEIA training (i.e., teambuilding, communication, and conflict-resolution). *Standards for Internal Control in the Federal Government* emphasize the importance of training in enabling individuals to develop competencies appropriate for key roles, reinforce standards of conduct, and tailor training based on the needs of the role. All the subject matter specialists we spoke with agreed that training programs applying DEIA practices and principles related to teambuilding, communication, and conflict resolution can be beneficial.

Assess effectiveness of DEIA training and modify as necessary. We have reported that agencies should assess the effectiveness of their training efforts.⁴⁶ Such an assessment can help decision makers in managing scarce resources and help agencies improve results. We were

⁴⁵The White House. *Government-Wide Strategic Plan to Advance Diversity, Equity, Inclusion, And Accessibility in The Federal Workforce* (November 2021).

⁴⁶GAO, *Unwanted Sexual Behavior: Improved Guidance, Access to Care, and Training Needed to Better Address Victims' Behavioral Health Needs*, [GAO-23-105381](#) (Washington D.C.: Aug. 02, 2023); [GAO-05-90](#); and [GAO-04-546G](#).

also told by several subject matter specialists that training can be more effective if it is regularly assessed and updated to meet changing needs of staff and changes in the work environment. For example, some subject matter specialists told us that bystander intervention training—training employees to speak up when discrimination is present to identify bias—can help raise issues when they see discrimination toward someone else, as sometimes marginalized groups are afraid to raise issues due to possible retaliation.

Communication

Communication—communicate the organization’s support for DEIA.



Key considerations:

- Develop and implement communication strategies that support DEIA (i.e., newsletters, policy statements, speeches, and meetings)
- Use language that shows support for a diverse and inclusive workforce
- Report status of DEIA efforts to organization and stakeholders (i.e., Congress and agency employees)

Source: GAO analysis of relevant literature and interviews with subject matter specialists. | GAO-24-106684

Our analysis of relevant literature and all subject matter specialists emphasized the importance of this practice, newly identified in this 2024 update of leading DEIA practices. We previously reported the importance of communication in supporting agency DEIA, as well as organizational transformation and government reform efforts.⁴⁷ Effective communication should cover the values and behaviors an organization expects in its workplace. For DEIA to be effective, employees need to see that these values are communicated and demonstrated in their daily experiences at work, and leaders need to ensure that mechanisms are in place to support these values. Most of the subject matter specialists we interviewed told us that communication is integral for effective DEIA because it relates to how employees talk and share information with one another. They also said that agencies should use communication strategies to build and sustain a supportive DEIA culture. The following key considerations support the practice of communication.

Develop and implement communication strategies that support DEIA (i.e., newsletters, policy statements, speeches, and meetings). Senior management can send a clear message about the seriousness and business relevance of DEIA by communicating its commitment to DEIA

⁴⁷See [GAO-18-427](#); [GAO-05-90](#); and [GAO-03-669](#).

throughout the organization. Two subject matter specialists emphasized that developing an underlying message about how DEIA supports the overall mission of the organization, and not just how DEIA may benefit certain groups, is critical to developing an effective communication strategy. Our prior work and most subject matter specialists agreed that leaders can demonstrate their organization's support for DEIA in newsletters, policy statements, speeches, meetings, and websites. Two subject matter specialists agreed that these strategies should highlight employees from a variety of backgrounds, such as those with disabilities, to show commitment to equal employment opportunity.

Use language that shows support for a diverse and inclusive workforce. Agencies can build and maintain a culture of inclusion by using appropriate language to support all employees. According to the literature we reviewed, while often unintentional, exclusive language used in workplace policies and employee communications can heighten feelings of being an outsider. To address these issues, agencies can take steps to use language in agency communications and during meetings that may help employees to feel more included. For example, we received a guide for workplace language called "Words at Work" from one of our subject matter specialist interviewees. The interviewee's organization uses this guide to build an inclusive environment for all employees. According to our review of this document, the guide is a tool that enables everyone in the organization to feel valued and respected and able to contribute their talents to drive organizational performance. It also provides examples of how to approach conversations in a respectful and accurate way.

Report status of DEIA efforts to organization and stakeholders (i.e., Congress and agency employees). Creating an effective and ongoing DEIA communication strategy involves reaching out to employees, agency customers, and other stakeholders to engage them in DEIA efforts relevant to their roles. Two subject matter specialists we spoke with told us that communication can be directed from the "bottom-up as well as the top-down" and empowers employees when this feedback is acted upon. This communication is central to forming the effective internal and external partnerships that are vital to the success of any organization. Most of the subject matter specialists we spoke with emphasized the importance of communication regarding DEIA and noted it is critical that leaders provide regular updates on successes and challenges as the organization pursues DEIA improvements.

Agency Comments

We provided a draft of this report to EEOC and OPM for review and comment. EEOC and OPM provided technical comments, which we incorporated into the report as appropriate. The Chair of EEOC provided written comments, reproduced in appendix II. In summary, the Chair stated that DEIA programs should be designed to comply with EEO laws, ensuring that all employees have a full and equal opportunity to participate, contribute, and succeed in the workforce. The EEOC Chair also noted that all employees benefit when employers use actionable strategies to promote equal opportunity within the workforce and that when implementing DEIA practices, organizations should proceed carefully, strategically, and with guidance from counsel. OPM stated it had no written comments on the draft.

We are sending copies of this report to the appropriate congressional committees, the Chair of EEOC and the Director of OPM. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6806 or LockeD@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



Dawn G. Locke
Director, Strategic Issues

Appendix I: List of Subject Matter Specialists Interviewed

1. Jacqueline Ashley, DSW, Executive Leadership Coach, Co-Owner of WorkLifeHealth.design
2. Alana Baker, Policy Analyst, Directorate for Public Governance, Organisation for Economic Co-operation and Development (OECD)
3. Sandra D. Bruce, Inspector General, U.S. Department of Education, and Chair of Council of the Inspectors General on Integrity and Efficiency DEIA Committee
4. Christopher Button, Supervisory Policy Advisor, Workforce System Policy with the Office of Disability, Employment Policy, U.S. Department of Labor (DOL)
5. Kathryn Cleary, Senior Principal, Advisory DEI/ESG Human Resources Practice, Gartner
6. Leisha DeHart-Davis, Ph.D., Professor, University of North Carolina at Chapel Hill
7. Elena Foshay, Director, Workforce Development Board, City of Duluth, Minnesota
8. Daniel Gerson, Lead, Public Employment and Management, Directorate for Public Governance, OECD
9. Elizabeth Hirsh, Ph.D., Professor, University of British Columbia
10. Kevin Johnson II, Director, Federal Workforce Programs, Partnership for Public Service
11. Niall Leavy, Head of Market Engagement, Public Appointments Service, Ireland
12. Michael Massiah, Chief (retired), Office of Diversity and Inclusion, The Port Authority of New York and New Jersey
13. Siobhán McKenna, Head of Equality, Diversity and Inclusion, Public Appointments Service, Ireland
14. Natalia Nolan, Senior Policy Analyst, Directorate for Public Governance, OECD
15. Jane O'Leary, Ph.D., Research Director, Diversity Council Australia
16. Brent Opall, Ph.D., Professor, University of Wisconsin, Eau Claire
17. Louis Orslene, Director of Employer and Workplace Policy, Office of Disability Employment Policy, DOL
18. Naomi M. Barry-Pérez, Director, Civil Rights Center, DOL

**Appendix I: List of Subject
Matter Specialists Interviewed**

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19. Heather Stein, Director, Office of Diversity and Equal Opportunity,
Minnesota Department of Employment & Economic Development
 20. Jeffrey Sumberg, Executive Partner, Gartner for CHRO
 21. Roisin Walsh, Head of Workforce Capability and Inclusion,
Department of Public Expenditure, NDP Delivery and Reform, Irish
Civil Service

Appendix II: Comments from the Equal Employment Opportunity Commission



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, D.C. 20507

May 14, 2024

Ms. Dawn Locke
Director
Strategic Issues
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Ms. Locke:

Thank you for the opportunity to review the Government Accountability Office's (GAO) draft report entitled *FEDERAL WORKFORCE: Leading Practices Related to Diversity, Equity, Inclusion, and Accessibility* (GAO-24-106684). The U.S. Equal Employment Opportunity Commission (EEOC) sincerely appreciates GAO's focus on ensuring workplace equity within the federal government. In the draft report, GAO discusses leading practices for diversity, equity, inclusion, and accessibility (DEIA) in the federal workforce and includes considerations for implementing DEIA practices. The report emphasizes the importance of the federal government's role in cultivating a workforce that provides opportunities for all to excel. The EEOC submits the following comments.

The EEOC was created in direct response to the historic 1963 March on Washington for Jobs and Freedom and first opened its doors in 1965 with a simple mission — to prevent and remedy discrimination in our nation's workplaces. The statutes the EEOC enforces prohibit discrimination against any employee or applicant based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 and older), disability, and genetic information.

Since 1965, the EEOC has worked to prevent and remedy unlawful employment discrimination and advance equal opportunity for all in the workplace. While equal employment opportunity (EEO) laws are separate and distinct from DEIA, there is considerable overlap. As such, the EEOC continues to play a critical role in advancing DEIA in the workplace to promote equal opportunity.¹

As GAO's draft report recognizes, the federal government is the nation's largest employer, and should be a model for creating workplaces that are inclusive and draw upon the strengths of employees from all backgrounds. Moreover, as set forth in Executive Order 14035, the federal government must ensure that it has a workforce that reflects the diversity of the American people and that all employees are treated with dignity and respect. The EEOC's [Strategic Enforcement Plan \(SEP\) for Fiscal Years 2024 –2028](#), which establishes the EEOC's subject matter priorities to achieve its mission, commits to "support employer efforts to

¹ See [EEOC FY 2023 Annual Performance Report](#).

**Appendix II: Comments from the Equal
Employment Opportunity Commission**

implement lawful and appropriate DEIA practices that proactively identify and address barriers to equal employment opportunity, help employers cultivate a diverse pool of qualified workers, and foster inclusive workplaces.”

DEIA programs should be designed to comply with EEO laws, ensuring that all employees have a full and equal opportunity to participate, contribute, and succeed in the workforce. The programs therefore should not encourage unlawful decision-making on the basis of protected characteristics. When implementing DEIA initiatives, agencies should focus on identifying barriers and complying with employment discrimination laws, which prohibit hiring quotas based on protected characteristics.

Thank you for GAO’s work to strengthen and improve DEIA efforts. All employees benefit when employers use actionable strategies to promote equal opportunity within the workforce. When implementing DEIA practices, organizations should proceed carefully, strategically, and with guidance from counsel.

We appreciate the opportunity to review the draft report and to submit these comments for your consideration. We hope that you find this information helpful.

Sincerely,



Charlotte A. Burrows
Chair

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Dawn G. Locke, 202-512-6806, locked@gao.gov

Staff Acknowledgments

In addition to the individual named above, the following staff made key contributions to this report: Clifton G. Douglas, Jr. (Assistant Director), Timothy Wexler (Analyst in Charge), Peter Beck, Carole J. Cimitile, Robert Gebhart, Latoya Hogg, Steven Putansu, Alicia White, and Clarette Yen.

GAO Related Products

GAO, *Coast Guard: Action Needed to Evaluate Efforts to Address Sexual Assault and Harassment*, [GAO-24-107388](#) (Washington, D.C.: Mar. 6, 2024)

GAO, *Sexual Harassment: Actions Needed to Improve Prevention Training for Federal Civilian Employees*, [GAO-24-106589](#) (Washington, D.C.: Feb. 26, 2024)

GAO, *U.S. Postal Service: Opportunities Exist to Strengthen Workforce Diversity Efforts*, [GAO-24-105732](#) (Washington, D.C.: Dec. 15, 2023)

GAO, *Federal Workforce: Data Reveal Minor Demographic Changes 2011-2021*, [GAO-24-105924](#) (Washington, D.C.: Nov. 17, 2023)

GAO, *VA Equal Employment Opportunity: Increased Attention Needed to Improve Program Effectiveness*, [GAO-23-105249](#) (Washington, D.C.: Sep. 12, 2023)

GAO, *Senior Reserve Officers' Training Corps: Actions Needed to Better Monitor Diversity Progress*, [GAO-23-105857](#) (Washington, D.C.: Aug. 24, 2023)

GAO, *Unwanted Sexual Behavior: Improved Guidance, Access to Care, and Training Needed to Better Address Victims' Behavioral Health Needs*, [GAO-23-105381](#) (Washington, D.C.: Aug. 2, 2023)

GAO, *Older Workers: Retirement Account Disparities Have Increased by Income and Persisted by Race Over Time*, [GAO-23-105342](#) (Washington, D.C.: July 27, 2023)

GAO, *VA Disability Benefits: Actions Needed to Further Examine Racial and Ethnic Disparities in Compensation*, [GAO-23-106097](#) (Washington, D.C.: July 26, 2023)

GAO, *HUD Rental Assistance: Enhanced Data and Strategy Could Improve Oversight of Accessibility Requirements*, [GAO-23-105083](#) (Washington, D.C.: July 20, 2023)

GAO, *U.S. Access Board: Interagency Efforts to Promote Accessibility for People with Disabilities Generally Followed Leading Collaboration Practices*, [GAO-23-105948](#) (Washington, D.C.: June 26, 2023)

GAO, *DOD Civilian Workforce: Actions Needed to Analyze and Eliminate Barriers to Diversity*, [GAO-23-105284](#) (Washington, D.C.: June 21, 2023)

GAO, *Wildland Fire: Federal Agencies Face Barriers to Recruiting and Retaining Firefighters*, [GAO-23-106888](#) (Washington, D.C.: June 8, 2023)

GAO, *Federal Workforce: Strengthening Diversity, Equity, Inclusion, and Accessibility*, [GAO-23-106254](#) (Washington, D.C.: Jan. 24, 2023)

GAO, *Securities and Exchange Commission: Employee Views of Personnel Management Improved, but Action Needed on Measuring Diversity and Inclusion Goals*, [GAO-23-105459](#) (Washington, D.C.: Dec. 22, 2022)

GAO, *Financial Services Industry: Overview of Representation of Minorities and Women and Practices to Promote Diversity*, [GAO-23-106427](#) (Washington, D.C.: Dec. 6, 2022)

GAO, *State and USAID: Efforts to Advance Diversity, Equity, Inclusion, and Accessibility*, [GAO-22-106150](#) (Washington, D.C.: July 26, 2022)

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