

# Executive Order 14091: Office of Personnel Management Equity Action Plan

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## (1) Message from the Agency Head

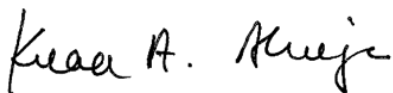
As Director of the U.S. Office of Personnel Management (OPM), I am pleased to present OPM's Equity Action Plan in accordance with Executive Order 14091. As the Federal government's chief human resources agency and personnel policy manager, OPM is deeply committed to developing policies and services that advance equity and remove barriers for underserved communities across the Federal government.

In 2021, OPM restored the Chief Human Capital Officers Council at OPM, established the Office of Diversity, Equity, Inclusion, and Accessibility (ODEIA), held focus groups with Federal employees to better understand the experiences of underserved communities with OPM programs, and finalized a series of policy actions that advance equity government-wide.

In 2022, OPM advanced and embedded equity further into our programs by increasing access to post-audit Applicant Flow Data (AFD); engaging Federal employees to inform the design of a future Federal Employees Health Benefits (FEHB) Program Decisions Support Tool; finalizing a series of regulations and policy actions that deepen OPM's commitment to leading as a model employer; and implementing major functions to support diversity, equity, inclusion, and accessibility (DEIA) across the Federal government, including launching the first Chief Diversity Officers Council.

In March 2023, OPM released updated guidance Advancing Gender Identity Inclusion in the Federal Workplace. The new guidance reflects several changes in law and executive policy that have occurred since this guidance was first written in 2015 and updated in 2017.

OPM's Equity Action Plan emphasizes the use of data to better understand barriers and advance DEIA principles in the Federal workforce, including releasing a data collection strategy of sexual orientation and gender identity (SOGI) data, consistent with Executive Order 14035. The Biden-Harris Administration is leading a vital national effort to advance opportunity and equity for every American. OPM is proud to contribute to these actions to advance equity for all.



Director  
U.S. Office of Personnel Management

## (2) Advancing Equity Through Agency Mission

As the Federal government's strategic partner for human resources policy, OPM is committed to a whole-of-government approach to advancing equity and supporting underserved communities. Through efforts such as future of work hiring initiatives, recruitment of early career talent, and identifying barriers to public service, we continue to build a Federal workforce that draws from the full diversity of the American people.

## (3) Executive Summary of Equity Action Plan

OPM identified five high-impact priorities to address barriers underserved communities may face in the Federal government and outlines actions OPM will take to advance equity.

### Continue Efforts to Expand Access and Use of Post-Audit Applicant Flow Data (AFD)

To better support Federal agencies, OPM plans to continue to expand Federal agency access to anonymized and post-audit AFD and strengthen the capacity of Federal agencies to analyze, interpret, and utilize AFD in accordance with all applicable laws. AFD is the demographic information provided by applicants on a voluntary basis for Federal job opportunity announcements through the USAJOBS.gov website. After a job opportunity is closed and all certificates issued under the announcement are audited, Federal agencies may use anonymized, post-audit AFD as part of their efforts to determine the existence of any barriers affecting applicants, as well as to develop future recruitment efforts.

OPM's role is to ensure agencies have access to anonymized, post-audit AFD and can collaborate with the Equal Employment Opportunity Commission (EEOC) to provide tools and training for agencies on the appropriate use of AFD. Additionally, OPM will partner with Talent Acquisition Systems to develop and implement government-wide data standards and business rules for the development and agency access of AFD. This will enable agencies to collect, access or use AFD from talent acquisition system provider(s) more easily.

### Fostering a Diverse, Equitable, Inclusive, and Accessible Workforce

OPM seeks to advance the Federal government as a model employer and lead efforts to build a strong Federal workforce. To lead as a model employer, OPM has analyzed barriers within recruitment and retention for early career talent in the Federal government, including the recruitment of students from Historically Black Colleges and Universities (HBCUs) and other Minority Serving Institutions (MSIs). OPM partnered with Hampton University and a local high school district, Hampton City Schools, to pilot a one-day Federal career-readiness event called "Level Up to Public Service." The evaluation of the post-event data revealed this event was successful in sparking interest in and improving student understanding of Federal

careers and internships. OPM will scale the original pilot program to include a cross section of HBCUs over the next year and will grow the effort to include Hispanic Serving Institutions (HSIs), Tribal Institutions, and community colleges.

OPM will also create government-wide technical assistance to support Federal agencies which are engaging with MSIs and invest in a paid media campaign that all agencies can use to recruit early career talent from underserved communities. As a result of these efforts, OPM, in collaboration with the Chief Diversity Officers Executive Council and other relevant stakeholders, will address barriers that the Federal government currently faces with attracting and retaining early career talent from underserved communities.

### Federal Employees Health Benefits (FEHB) Affordability Study

OPM is committed to identifying barriers facing those eligible to enroll in the FEHB Program (Federal employees, annuitants, and Tribal employees). Available evidence suggests that lower waged Federal employees and retirees experience difficulty affording their share of premiums, as well as health plan copayments and coinsurance. OPM is conducting an FEHB Affordability Study to understand the root causes leading to employees choosing not to enroll in FEHB Program. This study will analyze enrollment patterns, the Federal Employee Benefit Survey, and focus group feedback. This affordability study will support efforts in advancing equity for underserved communities by identifying barriers to accessing affordable health insurance coverage offered through the FEHB Program and examining ways of overcoming those barriers to seek to ensure all Federal employees have access to health benefits.

### FEHB Services that support high quality Maternal Health Care for Federal Employees

Poor maternal health outcomes for Native Americans and African Americans far exceed those of other pregnant people, and these disparities persist at all income levels. OPM is committed to serving as a model employer by ensuring that all pregnant FEHB Program enrollees have access to high quality perinatal care, including more intensive services for high-risk pregnancies resulting from medical and/or social circumstances. OPM has strongly encouraged FEHB Program Carriers to expand coverage and services for prenatal and postpartum care that includes screening and treatment for postpartum depression; adopt the Hear Her™ Campaign enhancing communications between patients and healthcare providers; increase reimbursement and expand coverage for certified nurse midwives, birth centers, and perinatal support services such as doulas and nurse home visits; and contract with hospitals that have received HHS's "Birthing-Friendly" hospital designation. OPM will

continue to address equity barriers for underserved communities by encouraging FEHB Carriers to expand those services aimed at reducing maternal health disparities.

### Paid Parental Leave (PPL) Study

OPM is committed to identifying barriers and understanding how paid parental leave (PPL) affects Federal employees and agencies. Available evidence suggests that some eligible Federal employees are not taking the full PPL benefits that are available to them through the Federal Employee Paid Leave Act (FEPLA). FEPLA provides up to 12 weeks of PPL to eligible Federal employees in connection with the birth of an employee's child or placement of a child with an employee for adoption or foster care. On August 10, 2020, OPM issued interim regulations to implement the PPL law, which went into effect on October 1, 2020. This study will advance equity for Federal employees by assessing any gaps in use of leave by demographic group and examining any effects on women's participation in the labor force. This study is also included in the OPM commitments for the National Strategy on Gender Equity and Equality.

## (4) Summary of Equity Progress and Early Accomplishments

OPM has continued work to advance equity and remove any barriers for underserved communities in its efforts to make the Federal government a model employer, rebuild the workforce, and elevate OPM as an institution to better serve the American people. Included below is a summary of OPM's equity progress and achievements between January 2022 to August 2023.

### [2022 Equity Action Plan Update \(pursuant to EO 13985\)](#)

- **Expanded Agency Access to and Use of Post-Audit Applicant Flow Data (AFD)**
  - OPM launched a new reporting capability (Power BI), which includes reporting capabilities and dashboards to support Federal agencies. The use of Power BI expands beyond improved access to AFD and includes broad access to talent acquisition data for agencies and the public, as well as other OPM data products. OPM has established connectivity between most agencies and OPM's Power BI environment. The primary impediment remains building connections between OPM and agencies that operate in the Azure Government Cloud (Department of Defense (DOD), Department of Justice (DOJ), and some elements of Treasury).
  - OPM is currently developing initial guidance for agencies and talent acquisition systems for how AFD should be structured and made available to different roles in agencies, including hiring managers. The guidance aims to establish clear government-wide standards on AFD data structure, access, and use. When agencies adhere to these standards, individuals involved in agency hiring

processes will have expanded access to AFD while ensuring appropriate guidelines for responsible use are followed. These standards will also promote consistency between the different talent acquisition systems, further supporting the responsible use of AFD across the government.

- **Build a New Federal Employees Health Benefits (FEHB) Program Decision Support Tool**
  - In 2022, OPM conducted six focus groups of Federal employees and completed a report on our findings. The findings helped us to identify key features and functionality that Federal employees desire in a Decision Support Tool and were shared to inform the user-research for the Decision Support Tool for Postal employees. In addition, OPM finalized a customer experience web survey and published the Paperwork Reduction Act (PRA) notice to implement the web surveys. OPM also drafted questions we plan to incorporate into the 2023 Federal Employee Benefits Survey to assess employee views on the current plan comparison tool.
  - Additionally, OPM issued a [Request for Proposals](#) with Decision Support Tool requirements for the Postal Service Health Benefits Program.
- **Provide tools to Benefits Officers Across Government to Advance Financial Security**
  - OPM's Retirement Services is continuing to drive initiatives that seek to improve retirement readiness and financial literacy for members of underserved communities within the Federal government. Our effort is targeted at examining disparities in financial security outcomes across the Federal government. OPM has collected data on existing financial literacy programs from relevant agencies across government and has conducted a rigorous literature review that focuses on summarizing evaluations of employer-based retirement and readiness for financial security. OPM is using this information to develop a financial literacy curriculum.

### Environmental Justice Scorecard (pursuant to Section 223 of EO 14008)

- EO 14008 required OPM to submit a [Climate Action Plan](#) detailing our actions to support efforts to combat climate change. Since submitting this plan, OPM has helped to raise the minimum wage for Federal employees to \$15 per hour, which has led to a raise for approximately 70,000 Federal employees, including wildland firefighters who are battling the effects of climate change. OPM has also worked to expand availability of effective training to expand government's awareness and competencies related to climate adaptation and resilience. OPM conducted a government-wide study on expanding availability of effective training related to climate adaptation and resilience and is continuing to explore the evidence that has been collected.

## Additional Efforts to Advance Equity

- **Healthcare and Insurance**
  - **Federal Employees Health Benefits Program (FEHBP) Call Letter:** On March 1, 2023, OPM issued an annual Call Letter for 2024 FEHBP plans that serve 8.2 million Federal employees, annuitants, and their family members. Priorities for the coming year include requiring health plans to offer expanded fertility benefits, including artificial insemination and coverage of 3 cycles of In Vitro Fertilization (IVF) related drugs annually; encouraging closer coordination with Medicare Part D employer group waiver plans for annuitants with FEHB and Medicare; and leveraging reductions in cost sharing resulting from the Inflation Reduction Act.
  - **2023 Employee Wellness Guidance and Ensuring Access to Mental Health Services:** In May 2023, OPM issued Employee Wellness Guidance that is designed to foster the mental, emotional, and physical prosperity of Federal employees through workplace wellness tools and resources which can optimize both employee and organizational success. By reframing Employee Assistance Programs as wellness programs, OPM is striving to de-stigmatize the use of mental health services. We also have continued efforts to achieve mental health parity through access to mental health services offered by FEHB Carriers, by working with Carriers to ensure mental health services are reimbursed similarly to physical health services.
  - **Carrier Letter on Contraception:** In August 2022, OPM issued a Carrier Letter on Contraception reminding Carriers of their responsibilities to offer contraceptive services with no enrollee cost-sharing and updating FEHB guidance to be consistent with guidance from the Departments of Health and Human Services (HHS), Treasury, and Labor on coverage of certain contraceptive services and products, including emergency contraceptives. In particular, the guidance required FEHB Carriers to implement “exceptions processes” that enable enrollees to petition for coverage of alternate forms of contraception than those listed in the plan brochure when warranted using expeditious and timely exception processes. In support of Executive Order “Strengthening Access to Affordable, High-Quality Contraception and Family Planning”, in the fourth quarter of 2023, OPM will share updated guidance on promoting access to affordable, high-quality contraception.
- **Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce**
  - **DEIA National Engagement for Federal and Non-Federal Employees:** OPM hosted a virtual DEIA National Engagement for Federal and Non-Federal employees. The focus of the national virtual event was to share publicly available documents as exemplars to both the private and public sectors that promote promising practices and DEIA in the workforce, as well as highlight the 2023 Gender Inclusion Guidance Document, the DEIA Annual Report, and the

[Government-wide Strategic Plan for DEIA](#) in the Federal Workforce. This national virtual engagement was held on April 19, 2023.

- **Employee Resource Group (ERG) and Affinity Group Summit:** OPM convened the first-ever government-wide Employee Resource Group (ERG) and Affinity Group Summit in April 2022. It was held again in May 2023. This ongoing and annual event is designed to equip Federal employees in ERGs and affinity groups to better support agency efforts to strategically advance DEIA and increase participation in the OPM Federal Employee Viewpoint Survey (FEVS), an organizational climate survey that assesses how employees jointly experience the policies, practices, and procedures characteristic of their agency and its leadership.
- **DEIA Summit:** In December 2022, OPM convened a three-day national event, “DEIA Summit 2022: A Whole-of-Government Approach to Disability Employment” to discuss promising practices and strategies to improve employment for people with disabilities in the Federal workforce.
- **DEIA Learning Community for all Federal Agencies:** Since July 2021, OPM has led a DEIA Learning Community to support all Federal agencies with implementing promising practices, and worked with agencies as they self-assessed the strengths and challenges related to DEIA practices within their own organizations. Learning community offerings are open to all Federal employees and include webinars, newsletters, office hours, and 24-hour access to online resources, videos, and templates.
- **DEIA Annual Report:** In February 2023, OPM released *Government-wide DEIA: Our Progress and Path Forward to Building a Better Workforce for the American People*, the inaugural annual report providing a government-wide perspective of DEIA progress.
- **Chief Diversity Officers Executive Council:** In September 2022, OPM established the [Chief Diversity Officers Executive Council](#) as a coordinated effort to embed DEIA principles across the Federal government.
- **Support for Formerly Incarcerated Individuals:** OPM supported formerly incarcerated individuals, justice-involved youth, and those with lived experiences by partnering with organizations to provide information sessions and existing resources on Federal application process and personnel vetting process. During Second Chance Month in April 2022, OPM posted a “Guide to Federal Employment for Second Chance Applicants.”
- **LGBTQIA+**
  - **Gender Identity Guidance:** OPM published Gender Identity Guidance to all agencies on Transgender Day of Visibility on March 31, 2023.
  - **Equitable Healthcare Coverage:** Through the FEHB Program, OPM continues to emphasize the importance of equitable healthcare coverage for LGBTQIA+ employees, beneficiaries and eligible dependents, including advancing comprehensive coverage of gender-affirming care and services.



- **Early Career Talent**
  - **Federal Internship Portal:** In February 2023, OPM launched the Federal Internship Portal with a webinar featuring a panel discussion with former Federal interns from NASA, HHS, DOI, and EPA, and a live demo of the Portal. Over 1,880 individuals RSVP'd for the event and over 700 attended. The Federal Internship Portal aims to attract early career talent to join the Federal workforce. In rolling out the Portal, OPM conducted outreach to over 700 college and university counselors and academic coordinators to promote Federal internships and the intern experience program. Additionally, OPM focused outreach on minority-serving institutions and outside organizations, including 19 nonprofit organizations focused on promoting equitable access to jobs, higher education, or affinity groups. This has also been included in the OPM Gender Equity and Equality Action Strategic Plan.
  - **Guidance on Promoting Internships and Other Student and Early Career Programs in the Federal Government:** In January 2023, OPM issued guidance on internships and similar programs including guidance to increase the availability of paid internships, and reduce the practice of hiring interns, fellows, and apprentices who are unpaid in accordance with EO 14035.
  - **Pathways Proposed Regulation:** In August 2023, OPM proposed to modify the Pathways Program to better meet the Federal government's needs for recruiting and hiring interns and recent graduates. The Pathways Program consists of three programs: Pathways Internships, Recent Graduates, and the Presidential Management Fellowship. OPM is proposing changes to improve and enhance each of these programs, consistent with Executive Order 13562, and to strengthen the Federal government's efforts to recruit and retain early career talent.
- **Federal Recruitment Engagements**
  - **HBCU and FEB Recruitment Event:** OPM convened an open dialogue and exchange of ideas on how Federal agencies can create or support pathways, pipelines, or curriculums to sustain Federal employment for students of HBCUs in partnership with the Atlanta Federal Executive Board (FEB) and the Atlanta University Center Consortium. The conversation included internship opportunities, best practices, challenges, and opportunities to improve recruitment for Federal jobs with the goal of gaining better insight on how Federal agencies can continue to establish, strengthen, and sustain partnerships between HBCUs and Federal agencies.
  - **OPM and Department of Commerce Roundtable on Equitable Recruitment and Hiring:** In January 2022, OPM and the Department of Commerce hosted a roundtable *Reinventing the Federal Workforce, A Roundtable Discussion on Making Government the Model Employer*. The conversation included two HBCU Presidents and leaders from a Hispanic-serving and disability advocacy organization. The conversation focused on equitable recruiting and hiring,

removing application and hiring process barriers, and best practices specific for underserved communities, including people with disabilities, communities of color, and HBCUs and Minority Serving Institutions.

- **Tribal**

- **Development and delivery of training modules and uniform standards on Tribal Consultation:** On April 17, 2023, OPM in partnership with the Department of Interior held a Tribal Consultation on the development and delivery of training modules on Tribal Consultation as called for in [the President Memorandum on Uniform Standards for Tribal Consultation](#). OPM is working to incorporate the input from the consultation in these training modules to ensure that the Federal government is upholding its nation-to-nation obligations in every tribal consultation. Additionally, OPM played a critical role in developing the Uniform Standards for Tribal Consultation that were detailed in the presidential memorandum.
- **American Indian Science and Engineering Society (AISES) Recruitment Event:** For the first time, OPM hosted the American Indian Science and Engineering Society (AISES) Government Relations Council meeting to support recruitment of Native Science, Technology, Engineering, and Math (STEM) talent to the Federal workforce and strengthen the agency's relationship with Native communities. OPM covered topics such as the DEIA EO, USAJOBS, and internships. Additionally, OPM will participate at the 2023 AISES National Conference by hosting a session on USAJOBS and helping convene a principals-level roundtable.
- **A Customer Experience Approach to Understanding Tribal Nations Experiences Accessing Federal Grants on Performance.gov:** In partnership with OMB's Federal Customer Experience team and the U.S. Digital Service (USDS), OPM used human-centered design to understand Tribal Nations' experiences in accessing Federal grants. Established in Executive Order 14058, this cross-agency effort aims to improve customer experience and the delivery of government services to Tribal Nations.

- **Military Spouse and Veterans**

- **Minimum wage Federal agency Implementation Guidance:** Release of the \$15 minimum wage Federal agency implementation guidance, which applies to and brings economic support to veterans and military spouses serving in Federal positions (January 2022).
- **Hiring Guidance for Certain Military Spouse:** OPM issued updated hiring policy guidance (Non-Competitive Appointment for Certain Military Spouses) and enabling human resource tools to enhance military spouse access to Federal service (Fall 2022-Spring 2023).
- **Outreach to the Veteran and Military Community for Feds Hire Vets:** OPM continues to facilitate ongoing outreach to the veteran and military community, including the hosting of Feds Hire Vets website, a centralized

online website dedicated to informing veterans on how best to navigate the Federal hiring process and providing education for the special entry paths available to them.

### Advancing Equity Through Key Regulations

- **Pay Equity:** In May 2023, OPM released proposed regulations that would prohibit the use of salary history when setting pay for Federal jobs—an important step to help address gender and racial pay gaps.
- **Fair Chance to Compete for Jobs:** On September 1, 2023, OPM published regulations pertaining to when, during the hiring process, a hiring agency can request information typically collected during a background investigation from an applicant for Federal employment. The regulations expand the positions covered by the Federal government’s “ban the box” policy, which delays inquiries into an applicant’s criminal history until a conditional offer has been made.

## (5) Strategies to Advance Equity in FY 2024

### Strategy 1: Increase access and use of Applicant Flow Data (AFD) government-wide to inform agency strategic workforce planning and data-driven decisions

This strategy connected to our commitments in the OPM Strategic Objective 1.1, which seeks to achieve a Federal workforce that is drawn from the diversity of America, exhibited at all levels of government, by supporting agencies in fostering diverse, equitable, inclusive, and accessible workplaces. OPM’s strategic efforts over the last two years are around improving the data that agencies can access regarding hiring, and as outlined in [OPM's 2022 Equity Action Plan](#), OPM will continue efforts to expand Federal agency access to post-audit AFD and strengthen the capacity of Federal agencies to analyze, interpret, and use anonymized, post-audit AFD.

#### Whole-of-Government Equity Objective(s)

- **Economic Justice:** Build a strong, fair, and inclusive workforce and economy.

**Collaborating Agencies:** Equal Employment Opportunity Commission (EEOC)

#### Barriers to Equity

- Although the Federal workforce attracts a highly diverse applicant pool, post-audit AFD trends consistently show a drop-off in representation for certain groups in later stages of hiring. The primary cause or causes of this effect is unclear. More research and barrier analysis are required to better understand any barriers in agencies’ hiring processes.
- Several known challenges prevent agencies from fully using post-audit AFD as part of the materials to identify and mitigate barriers to Federal employment. These

challenges primarily relate to data gaps that limit AFD's ability to be a comprehensive data source, the lack of capacity on the part of staff in Federal agencies to analyze, interpret, and use the data (in conjunction with other materials), and uncertainty on how the data could be used beyond compliance reporting (such as MD-715 reporting).

### **Evidence Base to Support Strategy**

- All agencies and entities that make up a Federal agency have responsibilities under the Equal Employment Opportunity Commission (EEOC) issued Management Directive 715 (MD-715). MD-715 requires agencies to conduct periodic agency self-assessments and the identification and elimination of barriers that prevent equal employment opportunities in the workplace.
- Barrier analysis is a process used to identify, evaluate, and, where appropriate, remedy any policies, procedures, and/or practices that may lead to disparities in the hiring process for individuals seeking Federal employment.
- Preliminary analysis of AFD demonstrates that the Federal job applicant pool is highly diverse; however, agencies need to conduct barrier analysis to better understand if applicants experience barriers at any stages of an agency's hiring process.
- OPM's role is to ensure agencies have access to anonymized, post-audit AFD in order to support agency's barrier analyses and to collaborate with EEOC to provide tools and training for agencies on their use of post-audit AFD.

### **Actions to Achieve Equity**

To address these barriers, OPM will:

- Partner with EEOC to provide training and resources for Federal agencies on conducting barrier analysis and creating action plans.
- Partner with talent acquisition systems to develop and implement government-wide data standards and business rules for agency access and usage of Applicant Flow Data.
- Conduct a government-wide barrier analysis project that seeks to create resources to enable agencies to accelerate their ability to uncover, examine, and remove barriers to equal participation at all levels of the workplace.
- Develop initial guidance for agencies and talent acquisition systems for how AFD should be structured and made available to different roles in agencies.

### **Proposed Metrics**

- **Near- to Medium-Term:** Talent acquisition systems have adopted new government-wide data standards, providing a consistent AFD experience for all agencies.
- **Longer-Term:** Increase the percent of hiring managers who report they have access to and utilize AFD in the CHCO Hiring Manager Survey. In FY22, 43.1% of hiring managers reported reviewing applicant flow trends.

### Public Participation and Community Engagement

- OPM has held roundtable events with agencies implementing the Bipartisan Infrastructure Law (BIL). The first roundtable served as an exchange of ideas and information on how agencies are utilizing data. In the second roundtable, OPM partnered with the EEOC to share more about conducting barrier analysis.
- OPM will engage 5-8 agencies in a government-wide barrier analysis project to better understand why agencies may or may not be able to uncover, examine, and remove barriers to equal participation at all levels of the workplace.

### Strategy 2: Build a workforce that reflects the diversity of the American people by reducing barriers to Federal career opportunities

Build a workforce that reflects the diversity of the American people by reducing barriers to Federal internship and employment opportunities faced by those in underserved communities as well as recruiting early career and diverse talent. This strategy is a key component of EO 14035 objectives and complements efforts including those from the President’s Management Agenda, and OPM’s Strategic Objective 1.1.

### Whole-of-Government Equity Objective(s)

- **Economic Justice:** Build a strong, fair, and inclusive workforce and economy.

### Collaborating Agencies

- N/A

### Barriers to Equity

- [Some communities have historically been underrepresented in the Federal government workforce.](#)
- The government is having challenges in securing early career talent and many recent graduates are uninterested in or are unaware of Federal government jobs.
- Some students and recent graduates from high schools, college students from underserved communities, HBCUs, and other MSIs have expressed a lack of awareness around availability of government jobs and guidance on how to apply for Federal jobs.
- Many candidates who might consider Federal service are prevented from entering early career talent pipelines as they are unable to accept unpaid Federal job opportunities due to financial concerns.

### Evidence Base to Support Strategy

- According to a 2022 Qualtrics survey college age students and recent graduates, 38% of respondents seeking a bachelor's degree, [56% of recent graduates and 60% of recent minority graduates](#) said that they would not consider a job in the Federal government – 20% of which cited a lack of awareness around government jobs as the

reason why. This reflects the fact that as of 2022, [less than 7%](#) of the Federal workforce is under the age of 30.

- According to a participant survey following the pilot “Level Up to Public Service” event, 63% of the students expressed interest in pursuing a career in the Federal government before the event, and this figure rose to 78% after the event. This 15 percentage-point increase in interest indicates that this event enhanced awareness of and fostered interest in careers within the public service sector among college students from underrepresented communities.
- Students who are aware of Federal job opportunities face challenges with the application process. OPM’s ODEIA has partnered with institutions of higher education, including HBCUs and other MSIs, and have collected reports from student participants that have indicated there are challenges accessing and support in submitting applications for Federal internships and early career positions. Specifically, the following challenges have been reported to various Federal Chief Diversity Officers government-wide:
  - Students have limited exposure to or awareness of public service opportunities;
  - Students are experiencing challenges finding appropriate internships that support individual career goals;
  - Students need specific training to complete the Federal application process;
  - Students prefer internship opportunities that support their career goals, while also meeting their financial obligations.
- OPM, the Department of Labor, and OMB recently developed and launched a new portal on USAJOBS for prospective Federal interns. President Biden also expressed a strong commitment to paid internships as an equity issue in [White House Executive Order 14035](#) and the [Guidance on Promoting Internship and Other Student and Early Career Programs in the Federal Government](#). Additional actions that expose students and recent graduates from diverse backgrounds to Federal career opportunities and provide them with the necessary resources and support to apply for those positions are needed to build a robust pipeline of early career talent.

### **Actions to Achieve Equity**

To address these barriers, OPM will:

- Conduct outreach events for high school and college students from underserved communities, HBCUs, and other MSIs detailing the availability of Federal jobs and providing guidance on how to apply for them.
- Conduct a qualitative research study and engage with focus groups that include under-represented candidate audiences. OPM will conduct this study to better understand the motives behind seeking government work, job seeker behavior, applicant needs, and barriers to entry (e.g., distrust, fatigue, clearance debt, incarceration, citizenship issues).

- Create an agency-facing microsite to support Federal agencies seeking to hire applicants from Minority Serving Institutions (MSIs), Persons with Disabilities, and Formerly Incarcerated Individuals.
- Conduct a survey for participants from institutions that OPM partners with, and community outreach events to better understand how people from partner institutions and organizations experience the Federal application process and timeline for Federal jobs.
- Launch a media campaign to engage and increase awareness of Federal job opportunities among underserved communities and drive traffic to the newly created Candidate Landing Page, a tailored USAJobs application page.
- Create government-wide technical assistance to support Federal agencies who are engaging with MSIs.
- FEBs are a forum for communication and collaboration among Federal agencies outside of Washington, DC. Approximately 85 percent of all Federal employees work outside the National Capital Region. By establishing an action plan to partner with institutions and community organizations from all 31 geographic FEB locations, OPM will ensure it has a roadmap in place to increase representation of the Federal workforce from every part of America.
- Encourage Federal agencies to increase their use of paid internships by making them more accessible to early career talent from underrepresented group.
- To further support this strategy, OPM will continue working towards the commitments that have been outlined in the Alternatives to Re-entry Strategic Plan including:
  - Leveraging the Chief Diversity Officers Executive Council and Chief Human Capital Officers to work closely with other Federal agencies to prioritize and assist them with their efforts to recruit, hire, and retain qualified individuals from underserved communities;
  - Ensure effective implementation of the Fair Chance Act Rule which was published in September 2023; and
  - Promote Federal Hiring opportunities by, as appropriate, partnering with nonprofit service organizations that specialize in recruiting and supporting students from underrepresented groups with paid internship opportunities.

### **Proposed Metrics**

- **Near- to Medium-Term:**
  - Increase outreach events with more MSIs.
  - Increase representation of MSI candidates among USAJOBS profiles, internship and job applications. Improved perceptions of and satisfaction with Federal job opportunities and the Federal hiring process.
  - OPM will measure participant perceptions of and satisfaction with events through a Level Up survey. OPM will survey different stakeholders including K-12, post-secondary, and community organizations and will use the data to strengthen future events.

- Increase percentage of paid internship opportunities, by utilizing guidance and communications.
- Improve perceptions of and satisfaction with Federal job opportunities and the Federal hiring process.
- In 2024, OPM will hire FEB coordinators and create an action plan to engage and partner with institutions and community organizations from all 31 geographic FEB locations to increase awareness of an interest in Federal job opportunities.
- **Longer-Term:**
  - Within 10 years, OPM will coordinate with institutions and community organizations from the geographic locations of all 31 FEBS.

### **Public Participation and Community Engagement**

- OPM has launched “The Level Up to Public Service” pilot and has directly engaged with the high school and college students from underserved communities through creating events at schools that serve these populations such as HBCUs and MSIs. The pilot provides guidance about Federal jobs and how to apply for them and will be further expanded in the coming year.
- To support this strategy, OPM has conducted key informant interviews (KIIs) and other research and engagement with leaders of affinity groups.
- In 2024, OPM will launch a media campaign that will engage with the general public and will get feedback from focus groups and relevant stakeholders about Federal jobs among underserved populations, including but not limited to people with disabilities, the formerly incarcerated, and those affiliated with MSIs.
- OPM will focus on engaging with underserved communities from MSIs (EO 14035, Section 7a), persons with disabilities (EO 14035, Section 2a), and formerly incarcerated individuals (EO 14035, Section 2a). OPM will also inform and integrate with complementary efforts including those from the President’s Management Agenda.

### **Strategy 3: FEHB Affordability Study- Advance the equitable participation of Federal employees in the FEHB Program by identifying barriers and potential solutions to accessing health benefits**

OPM will conduct a study on non-enrollment patterns and employee perceptions of affordability to assess the extent and type of affordability issues. The study will also review strategies that other sectors have undertaken as well as potential policy solutions to address healthcare affordability. The study will develop a set of recommendations for OPM leadership to consider improving equitable participation in FEHB. These activities are aligned to OPM’s Strategic Objective 1.2, which seeks to position the Federal government as a model employer, including with respect to competitive benefits.



### Whole-of-Government Equity Objective(s)

- **Health Equity:** OPM's north star is to put people first and enhance their opportunities to participate in FEHB Program.

**Collaborating Agencies:** Department of Health and Human Services

### Barriers to Equity

- Federal employees and retirees face increasing health care premiums (as a percentage of income) and difficulty affording paying their share of premiums, as well as health plan copayments and coinsurance. These increases disproportionately impact lower wage Federal employees and retirees as there is no adjustment to reflect differences in family incomes.
- The government contribution toward FEHB enrollee premium is set in statute. These contributions are the lesser of 72 percent of the weighted average premium of all plans or 75 percent of the premium of the plan chosen by the enrollee.
  - The government contribution formula makes no distinction between the grade or salary level of the Federal employee or the amount of the annuitant's annuity payment. In other words, a Senior Executive enrolled in Blue Cross Basic pays the same self only premium as the GS-5 enrolled in the same plan, even though the Senior Executive may earn three times the pay of the GS-5.
- Similarly, health plan cost sharing at time of service, deductibles, and the maximum out of pocket payment allowed are not adjusted based on enrollee income or grade.
- The FEHB Program does not currently have information on the family income of individual employees or retirees to enable targeting of the FEHB benefit to those with lower incomes, and further research is needed to understand what factors affect non-enrollment and how employees perceive affordability.

### Evidence Base to Support Strategy

- In [analysis](#) of the Current Population Survey, the Kaiser Family Foundation reports that those enrolled in employer-based health insurance with incomes at or below 199% of the Federal Poverty Level (FPL) pay an average of 10.4% of their family income on health insurance premiums and out-of-pocket costs compared to an overall average of four percent for all employer-based enrollees.
- Health care premiums as a percentage of Federal pay have outpaced wage increases; for example, in 2012, a self only premium in the most popular nationwide plan represented 4.8% of a GS-5, Step 5 salary; in 2016, that figure rose to 5.6%; and, in 2022, it is 5.9%.
- Those that fall in the 200% to 399% FPL range pay 6.9% of family income for health insurance premiums and out-of-pocket costs.
- The number of Federal employees who decline FEHB coverage correlates closely with salary levels. The table below shows Federal employee enrollment status by salary level, drawn from OPM human resources data.

Salary Range	Number of Federal Employees who Declined FEHB Coverage		Number of Federal Employees who Enrolled in FEHB Coverage		Total number of Federal Employees
	#	%	#	%	
LT \$30,000	7,982	69.3%	3,537	30.7%	11,519
\$30-\$59,999	170,495	32.3%	357,172	67.7%	527,667
\$60-\$89,999	149,328	24.8%	452,251	75.2%	601,579
\$90- \$119,999	102,768	20.6%	396,982	79.4%	499,750
\$120-\$149,999	47,539	18.0%	217,162	82.0%	264,701
\$150,000 +	31,951	16.4%	162,475	83.6%	194,426
Total	510,063	24.3%	1,589,579	75.7%	2,099,642

- Those who are in lowest graded positions are approximately four times as likely to decline FEHB coverage than those in the highest graded tier.
- According to the Federal Employee Benefits Survey (FEBS), OPM understands that the primary reason Federal employees decline FEHB coverage is because they have coverage through TRICARE or their spouse’s employer-based insurance. However, FEBS results also show that those in the lowest wage categories are less likely to be covered by another person’s health insurance or TRICARE than those in higher wage categories.
- Based on responses to the FEBS, OPM understands that employees at lower grade levels are more likely to report that they are not enrolled because “health insurance through the FEHB is too expensive:”
  - Federal Wage System (hourly employees) – 15.3%
  - GS 1 – 6 – 5.6%
  - GS 7 – 12 – 4.8%
  - GS 13 – 15 – 2.2%
  - Senior Executive Service, Senior Leader (SL) – 0%

**Actions to Achieve Equity**

To address these barriers, OPM will:

- Conduct a mixed methods study that will access and analyze data on FEHB enrollment and use patterns by health plan and enrollee demographics to explore demographic and geographic variation in FEHB enrollment and affordability.
- Review existing studies on methods for improving access to employer-based insurance coverage.

- Document findings that will help OPM understand the trends and the reasons behind employees not accessing FEHB.
  - Resources that OPM will use to conduct this study include the Healthcare and Insurance FEHB Member Data, FEBS, literature on designing employer-based insurance to improve access for all employees, and assistance from an external health economist.
- Provide OPM with actionable insights and policy recommendations based on steps taken by other public and private sector employers to improve participation and reduce inequities in the program.
- Model coverage improvements based on proposed policy options, to the extent allowable by law.
- Identify participants and conduct focus groups to understand the root causes leading to non-participation in FEHB.

### **Proposed Metrics**

- **Near- to Medium-Term:**
  - Findings based on an analysis of FEHB enrollment data, FEBS data, and qualitative data.
  - Completed study with recommendations to improve equity.
  - Policy proposals to address affordability issues experienced by those eligible for FEHB.
- **Longer-Term:** Reduced percent of employees citing affordability as a reason for declining FEHB.

### **Public Participation and Community Engagement**

- Focus groups with current Agency Benefits Officers and Federal employees. The approach and investment in data linkages in this study could enable future of work on annuitants as well.
- Review the literature on affordability issues faced by other employer-based insurance programs, particularly those in the public sector.
- OPM will discuss affordability issues and strategies to address those issues with other employers.

## **Strategy 4: Advance equitable access to and the quality of maternal health benefits by expanding the scope and availability of covered prenatal and postpartum FEHB services**

In this strategy, OPM will improve access to and quality of maternal health outcomes, especially for persons of color, by expanding the scope of covered prenatal and postpartum services, increasing reimbursement for targeted prenatal and postpartum supports, and including a broader range of service providers such as doulas and nurse midwives. This strategy is affiliated to the OPM Strategic Objective 1.1.

**Whole-of-Government Equity Objective(s)**

- **Health Equity:** Advance equity in health, including mental and behavioral health and well-being, and deliver an equitable response following the COVID-19 pandemic.

**Collaborating Agencies:** Departments of Health and Human Services, Veteran Affairs, and Defense

**Barriers to Equity**

- As stated in the [White House Blueprint for Addressing the Maternal Health Crisis](#), Women in the US die from pregnancy-related causes at a higher rate than any other developed nation in the world. The maternal mortality rate is even worse for Black women, Native American women, and women who live in rural areas – all are significantly more likely to die due to pregnancy-related complications. This crisis has been worsened by the COVID-19 pandemic, which has increased rural maternal healthcare deserts.
- Barriers OPM seeks to address are also identified by the White House Blueprint for Addressing the Maternal Health Crisis and maternal health literature include access to prenatal care (particularly for marginalized communities), inadequate reimbursement for services offered by appropriate providers (e.g. midwives and doulas), and providers insensitive to the needs of women of color regardless of income.

**Evidence Base to Support Strategy**

- [According to the White House](#), Black women are three times more likely to die from pregnancy related causes, Native American women are more than two times as likely, and women who live in rural areas are 60% more likely to die.
- [Over 80%](#) of pregnancy-related deaths are preventable.
- Maternal mortality is highest in the first 42 days postpartum, representing 45% of total maternal mortality.

**Actions to Achieve Equity**

To address these barriers, OPM will:

- Strengthen coverage, benefits, and services around maternal healthcare, especially in support of prenatal and postpartum care, such as improving reimbursement and coverage of perinatal support visits and providing coverage of self-measured blood pressure cuffs and associated services to prevent hypertension.
- Adopt the Hear Her™ campaign to educate providers on how best to support pregnant people of color.
  - Adopt in this action means to provide funding for this provider education campaign for the medical providers in the FEHB plan provider networks.

- Increase reimbursement and coverage for childbirth education classes, group prenatal care, home visiting programs, care management for high-risk pregnancies, self-measured blood pressure monitoring, certified nurse midwives, birth centers, and perinatal support services, like doulas.
- Encourage FEHB Carriers to provide quality bonuses to maternity providers whose Consumer Assessment of Healthcare Providers & Systems (CAHPS) scores improve, reimburse at a higher rate health systems with Alliance for Innovation on Maternal Health (AIM) patient safety bundles or Joint Commission certification, use the “Birthing-Friendly” hospital designation coined by the Centers for Medicare and Medicaid Services (CMS), and to adopt the Centers for Disease Control (CDC) Hear Her campaign.
- Work with FEHB Carriers to improve the collection of maternal race and ethnicity data.
- Analyze race and ethnicity data on maternal health quality metrics from the National Committee for Quality Assurance for possible inclusion in the FEHB Plan Performance Assessment program and identify appropriate next steps.

### **Proposed Metrics**

- **Near- to Medium-Term:**
  - Improve perinatal care offered by FEHB plans, as measured by increased adoption of Hear Her campaign, increased coverage, and reimbursement for perinatal support services (including nurse midwives, birthing centers, and doulas), and increased contracting with Birthing Friendly hospitals.
  - Continue work to make improvements in access to postpartum depression care and services offered by FEHB plans, as measured by reported increases in coverage of postpartum depression screening and treatment.
  - OPM will continue to focus on these efforts in the coming years to address broader access, as appropriate. According to reported information from FEHB Carriers:
    - 72% of health plans have adopted the “Hear Her” campaign.
    - 77% of health plans cover certified nurse midwives.
    - 62% of health plans cover birth centers.
    - 35% of health plans cover doulas.
    - 50% of health plans cover nurse home visits.
    - 75% of health plans cover childbirth classes.
    - 46% of health plans offer incentives for prenatal care.
    - 66 % of health plans contract with birthing friendly hospitals.
- **Longer-Term:**
  - Increase in each contracted Carrier's percentage of enrollment with completed race and ethnicity fields. OPM will need to establish baseline levels and acceptable thresholds indicating incremental improvement.

- Achieve overall improved standard of care, as documented by improvements in FEHB plan performance on measures included in OPM's Plan Performance Assessment (PPA) program, including timeliness of prenatal care and receipt of appropriate postpartum care by FEHB enrollees.

### **Public Participation and Community Engagement**

- OPM will encourage FEHB plans to conduct outreach to pregnant enrollees to ensure they are aware of the value of timely and comprehensive perinatal care.
- Additionally, OPM will communicate directly to enrollees through OPM.gov about the value of timely and comprehensive perinatal care.

### **Strategy 5: Paid Parental Leave (PPL) Study-Assess use and equity of use to identify potential areas where employees may not be maximally using this new benefit or may be constrained from using the full amount of the benefit**

OPM will conduct a study on the Federal Employee Paid Leave Act, which provides up to 12 weeks of paid parental leave (PPL) to eligible Federal employees in connection with the birth of an employee's child or placement of a child with an employee for adoption or foster care. The study will assess use and equity of use to identify potential areas where employees may not be maximally using this new benefit or may be constrained from using the full amount of the benefit. The study will be used to identify potential strategies to address gaps in use. These activities are aligned to OPM's Strategic Objective 1.2, which seeks to position the Federal government as a model employer, including with respect to competitive benefits.

### **Whole-of-Government Equity Objective(s)**

- **Health Equity:** Advance equity in health, including mental and behavioral health and well-being, and deliver an equitable response following the COVID-19 pandemic.

**Collaborating Agencies:** N/A

### **Barriers to Equity**

- A poll on [awareness of a state paid leave policy](#) showed that individuals with a potentially greater need for paid parental leave, such as those with less education and people of color, may not have awareness of the benefits available to them.
- According to the U.S. Census Bureau's [study of paid leave](#), first-time mothers who use paid parental leave are less likely to leave the workforce, but those who use the benefit are more likely to be older, white, married, and have a higher educational attainment.
- [Multiple studies](#) have shown that parents often do not take advantage of the full duration of their paid parental leave benefit, with men and people of color reporting less leave use. Research suggests that the [longer the leave for mothers](#), the greater the

benefits to improved child health, and the [longer the leave for fathers](#), the greater their later involvement in child caretaking.

### **Evidence Base to Support Strategy**

- The 2021 FEBS found that only 67% of employees overall were aware of the paid parental leave benefit.
- The 2022 OPM FEVS found that just 81% of employees who had used paid parental leave reported that they had used or intended to use the full 12-week benefit. The main barriers reported by those using less than the full benefit were feeling that they could not be away from their job for 12 weeks or feeling that taking the full leave would affect their career advancement.
- While these surveys provide an indication of gaps, further analyses are needed to understand the extent of these gaps in awareness, use of the benefit, and amount of leave use within Federal government, across agencies and by employee demographics.

### **Actions to Achieve Equity**

To address these barriers, OPM will:

- Leverage existing data including payroll data (use of leaves and use of paid parental leave by type of qualifying event), employee personnel status data (for example, retention status and base pay), employee performance data (for example, award hours and award pay), FEVS and FEBS data, and employee demographic data (for example, gender, race and ethnicity, age, work schedule, and agency) to assess use and equity of use by demographics.
- For FY 2024, the focus of the evaluation for FY 2024 will be on identifying short-term outcomes for Federal employees for which there is sufficient, good quality data.
- Produce a report to help the Federal government understand where employees are not fully accessing PPL.
- Identify areas where agencies can provide more informational support on use of this benefit.

### **Proposed Metrics**

- **Near- to Medium-Term:** Issue a report summarizing trends and gaps in use and equity of use of PPL by January 2024.
- **Longer-Term:** Increased percentage of Federal employees using their full 12 weeks of PPL for a qualifying event.

### **Public Participation and Community Engagement**

- N/A