

Report to Congressional Requesters

August 2025

FEDERAL WORKFORCE

Selected Agencies
Need to Improve
Employee Name
Change Process

Highlights of GAO-25-107045, a report to congressional requesters

Why GAO Did This Study

Individuals can elect to change their legal names for various reasons, including marriage, divorce, or personal preference, and thousands of federal employees change their names every year. OPM instructs federal agencies to accept and process an employee's request for a name change due to marriage or court action on their personnel files.

GAO was asked to review the processes for federal employees to request changes to their names and genders on federal records. This report examines the extent to which selected agencies followed OPM's guidance from late 2023 through 2024 for name and gender changes. GAO selected four agencies for review—State, VA, IRS, and SSA—based on agency size and volume of public interaction. GAO reviewed OPM guidance and selected agencies' guidance and documentation. GAO also interviewed OPM officials and officials at each of the selected agencies. In addition, GAO held focus groups and interviews with employees who had experience with the name and gender change processes at each selected agency.

What GAO Recommends

GAO is making six recommendations to the four selected agencies to develop comprehensive documentation that guides employees through all steps of the name change process and create a specific mechanism for collecting employee feedback on the whole process, as applicable.

IRS, SSA, and State plan to take actions. VA disagreed and GAO still believes further actions would improve employees' experiences.

For more information, contact Dawn G. Locke at locked@gao.gov.

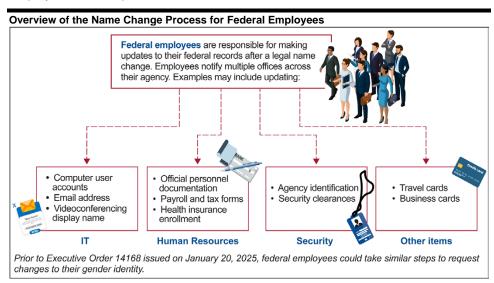
August 202

FEDERAL WORKFORCE

Selected Agencies Need to Improve Employee Name Change Process

What GAO Found

GAO found that all four selected agencies had procedures for processing personnel actions for employees who legally changed their names in accordance with Office of Personnel Management (OPM) guidance from late 2023 to 2024. Three of the four selected agencies—Departments of State and Veterans Affairs (VA) and Social Security Administration (SSA)—also had procedures following OPM guidance in place at the time for processing gender identity changes to their employees' official personnel folders. Internal Revenue Service (IRS) officials stated that they did not receive requests to process gender changes to employees' official personnel folders.



Source: GAO analysis of agency information and elizaliv/ikiry GR/gheatza/alekselveprev/pandavector/StockVector/stock.adobe.com (graphics). | GAO-25-107045

Two of the four selected agencies—SSA and VA—lacked comprehensive guidance documenting an employee's responsibilities to effectively complete all the steps required to request a name change, including expected time frames. GAO asked employees at each of the selected agencies to describe their agency's guidance or resources for the name change process. Employees in all focus groups and nearly all interviews said they experienced challenges navigating their respective agency's name change processes due to the lack of guidance or insufficient guidance. Without comprehensive documentation that clearly communicates the process for completing name changes, federal employees' abilities to complete work tasks could be adversely affected.

Each of the selected agencies lacked systematic feedback mechanisms for capturing employee views on all portions of the name change process. Participants in nearly all focus groups described challenges navigating human resources, IT, or security steps, including unhelpful interactions with agency staff. Without a specific feedback mechanism to collect employees' views on the various process steps for changing their names, selected agencies are missing opportunities for improvement, such as addressing employee pain points.

United States Government Accountability Office

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Abbreviations

eOPF	electronic Official Personnel Folder
EHRI	Enterprise Human Resources Integration
HCO	Human Capital Office
HR	human resources
IRS	Internal Revenue Service
OMB	Office of Management and Budget
OPM	Office of Personnel Management
SSA	Social Security Administration
VA	Department of Veterans Affairs

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August 14, 2025

The Honorable Robert Garcia
Ranking Member
Committee on Oversight and Government Reform
House of Representatives

The Honorable Ayanna Pressley House of Representatives

The Honorable Mark Takano House of Representatives

Millions of individuals, including thousands of federal employees, change their legal names every year. Name changes can occur for various reasons, including marriage, divorce, or personal preference. Ensuring that such changes are accurately and consistently reflected across government records is key, as it could affect an individual's eligibility for retirement, access to benefits payments, or processing of tax returns.

Prior to January 2025, federal employees were able to request a change to their names or gender identities, due to a gender transition, on their federal records to ensure that they were accurate and up to date.

Agencies relied primarily on the Office of Personnel Management's (OPM) guidance on updating an employee's name and gender upon request by an employee. OPM's Guide to Processing Personnel Actions previously directed agencies to accept and process an employee's request for a name change due to marriage, gender transition, or court action. OPM also provided instructions to agencies in The Guide to Personnel Recordkeeping on how to update an employee's name and gender identity on personnel records.

¹Office of Personnel Management, *Guide to Processing Personnel Actions*, Chapter 20: Name Change (Apr. 18, 2023). The current version of *Guide to Processing Personnel Actions*, Chapter 20: Name Change posted on OPM's website no longer references "gender transition" as a basis for when an employing agency must accept and process an employee's request for a change in name.

²Office of Personnel Management, *The Guide to Personnel Recordkeeping*, Chapter 4: How to Reconstruct a Personnel Folder, Update 13a (July 1, 2017). OPM officials reported that this guide is in the process of being updated.

On January 20, 2025, Executive Order 14168 directed agencies to remove all statements, policies, regulations, forms, communications, or other internal and external messages that promote or otherwise inculcate gender ideology, and cease issuing such statements, policies, regulations, forms, communications or other messages.³ Additionally, on January 29, 2025, OPM issued a memorandum regarding this executive order stipulating that agencies should review all agency forms that require entry of an individual's sex to ensure that they list male or female options only, and not gender identity, and ensure that all applicable policies and documents, including forms, use the term "sex" and not "gender." OPM issued a subsequent memorandum directing agencies to provide a progress report on steps that they have taken to implement Executive Order 14168 within the workplace, including reviewing and revoking any and all agency personnel policies that reflected or promoted gender ideology.⁵

You asked us to review the processes for federal employees to request changes to their names and genders on federal records. This report examines the extent to which four selected agencies followed OPM's guidance during our review period from late 2023 through 2024 for name and gender changes, including the views of federal employees on their agencies' name and gender change processes.⁶

³Executive Order 14168, "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government," 90 Fed Reg. 8615 (Jan. 30, 2025). Under the executive order, gender ideology is defined as "replac[ing] the biological category of sex with an ever-shifting concept of self-assessed gender identity, permitting the false claim that males can identify as and thus become women and vice versa, and requiring all institutions of society to regard this false claim as true. Gender ideology includes the idea that there is a vast spectrum of genders that are disconnected from one's sex. Gender ideology is internally inconsistent, in that it diminishes sex as an identifiable or useful category but nevertheless maintains that it is possible for a person to be born in the wrong sexed body."

⁴Office of Personnel Management, *Initial Guidance Regarding President Trump's Executive Order Defending Women* (Jan. 29, 2025).

⁵Office of Personnel Management, *Updated Guidance Regarding Executive Order 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (July 10, 2025).

⁶We collected information on the process for individuals to request changes to their gender identities from late 2023 through 2024, which was permissible at that time. In this report, the gender change process at selected agencies refers to an employee's request to change their gender identity.

Throughout this report, our findings reflect the conditions that existed at the time of our analysis (September 2023 to December 2024) and include employee and agency perspectives related to name and gender changes. However, in light of recent policy changes, namely the issuance of Executive Order 14168 in January 2025, we provide only descriptive information about findings specific to gender changes and do not make related recommendations.

To address our objective, we selected a nongeneralizable sample of large federal agencies that frequently interact with the public. To make this selection, we considered for each agency its number of employees (10,000 or more) and volume of interactions with the public involving personally identifying information, such as name and gender, on federal records (e.g., Social Security records, passports, etc.). Our four selected agencies are the Departments of State and Veterans Affairs (VA), the Internal Revenue Service (IRS), and the Social Security Administration (SSA).

We reviewed documentation related to the name and gender change processes in place at each of our selected agencies at the time of our review. We evaluated this information against relevant government-wide guidance, including OPM's 2023 Guidance Regarding Gender Identity and Inclusion in the Federal Workplace and principles related to documentation from the Standards for Internal Control in the Federal Government.⁷

We obtained record-level data from OPM's Enterprise Human Resources Integration system (EHRI) on the number of employee name changes processed at each selected agency and government-wide for fiscal years 2018 through 2023, the most current data available. To assess data reliability, we reviewed relevant OPM documentation for EHRI and obtained written responses from OPM officials. We determined that the data were sufficiently reliable for the purpose of providing background and context on the average number of employee name change requests. We also requested data from each selected agency on the number of

⁷Office of Personnel Management, *Guide to Processing Personnel Actions*, Chapter 20: Name Change (Apr. 18, 2023), *Guidance Regarding Gender Identity and Inclusion in the Federal Workplace* (Mar. 31, 2023), and *The Guide to Personnel Recordkeeping*, Chapter 4: How to Reconstruct a Personnel Folder, Update 13a (July 1, 2017); Office of Management and Budget, *Preparation, Submission, and Execution of the Budget, Circular No. A-11*, *Section 280* (July 2024); Principles 12.02 and 12.03; and GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

gender change requests, but agencies told us they did not track this information.

At each of the selected agencies, we interviewed knowledgeable agency officials on the name and gender change processes and conducted a total of eight focus groups (two per agency from May to July 2024) with employees who had recently requested name changes. We also conducted a total of seven interviews (one to two per agency) with employees who had experience with the name and gender change processes at their respective agencies from August to October 2024.8 In the focus groups and interviews, we discussed topics including (1) guidance and resources provided by the employee's agency, (2) implementation of steps for making name and gender changes at the employee's agency, and (3) experiences with name and gender changes at other federal agencies.

We asked participants about what went well with these topics, in addition to what challenges they experienced and opportunities for improvement. In addition, we met with lesbian, gay, bisexual, transgender, or queer employee groups at each agency to collect background information and request assistance with identifying employees to volunteer for interviews. Although our focus groups and interviews were designed to provide rich qualitative data on the experiences and perspectives of agency employees, findings from these focus groups and interviews represent only those who participated in these activities and are not generalizable to other employees within the four selected agencies or employees at other federal agencies. See appendix I for more details on our scope and methodology.

We interviewed OPM and Office of Management and Budget officials to obtain government-wide perspectives on name and gender changes across the federal landscape. We also interviewed selected external stakeholders, including organizations that help transgender individuals make name and gender changes on federal records. To select a

⁸Some employee interviewees had personal experience with the processes of changing their names and genders but had not yet fully completed one or both processes.

⁹We met with existing employee resource groups or special emphasis programs at selected agencies prior to the issuance of Executive Order 14168, 90 Fed Reg. 8615 (Jan. 30, 2025), and OPM's *Initial Guidance Regarding President Trump's Executive Order Defending Women* (Jan. 29, 2025). OPM's January 2025 guidance required agency heads to disband or cancel employee resource groups or special emphasis programs that encourage or promote gender ideology or have done so in the past.

nongeneralizable sample, we identified organizations that focused on transgender-related policies and offered resources, such as legal aid, to transgender individuals. Appendix I provides additional details on our scope and methodology.

We conducted this performance audit from September 2023 to August 2025 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

The process of undergoing a legal name change due to marriage, divorce, gender transition, or personal preference typically begins at the local level. Specific requirements vary by jurisdiction. While individuals begin the process of legally changing their names by obtaining and providing specific documentation, such as a court order, marriage certificate, or divorce decree through their local jurisdictions, they may have additional steps to complete at the state and federal levels (see fig. 1).

Figure 1: Overview of the Legal Name Change Process for Individuals



Prior to Executive Order 14168 issued on January 20, 2025, some federal agencies had policies and procedures for individuals to request changes to their gender identity that followed a similar process.

Source: GAO analysis of agency information and creativeteam/Macrovector/Lelia Ledencova/Victor Langer/Vector FX/jukovskyy stock.adobe.com (graphics). | GAO-25-107045

Name and Gender Changes at Selected Agencies

Individuals, including federal employees, may need to contact federal agencies that administer public benefits or service programs to complete the name change process. Federal employees generally take these steps prior to requesting a change at their employing agencies.¹⁰ For example:

- SSA. Individuals who change their names should update their Social Security records by completing a Social Security card application. SSA's external website provides information for requesting a name change on Social Security records and for obtaining an updated Social Security card. According to SSA, the agency receives an average of approximately 2.3 million name change requests annually.¹¹
- **IRS.** Taxpayers generally are not required to inform IRS of changes to their legal names. IRS's website directs taxpayers to report legal

 $^{^{10}\}mbox{We}$ present additional information about the public processes for name and gender changes in appendix II.

¹¹This average is based on the number of name change requests from fiscal years 2019 through 2023.

name changes to SSA. According to IRS, a taxpayer's name on their tax return must match Social Security records—a mismatch could delay a potential tax refund.

- State. Individuals who legally change their names can apply for updated passports at State. State's external website provides information on applying for an updated passport following a name change. According to State, the agency received nearly 600,000 passport renewal applications with name changes in fiscal year 2023.¹²
- VA. Veterans receiving health care can update their legal names at their VA medical centers. Veterans receiving benefit payments can update their legal names with each relevant benefit program.

Prior to January 2025, some federal agencies had policies and procedures for customers to request changes to their gender identities. For example, individuals previously had been able to request gender identity changes when applying for a new Social Security card or passport. Executive Order 14168 now requires government-issued identification and personnel records to accurately reflect the holder's birth sex, either male or female.

Federal Guidance on Federal Employee Name and Gender Changes

During the time period that we collected information and documentation for our review (September 2023 to December 2024), OPM's instructions in its guides to processing personnel actions and personnel recordkeeping stated that agencies must accept and process an employee's request for a name change due to marriage, gender transition, or court action, such as divorce or legal name change.¹⁴ The guidance provided instructions to agencies' human resources offices on processing a personnel action for a name change, which is recorded in an

¹²According to State, the statistic reflects the total number of passport renewal applicants who changed their names within 10 years of receiving their previous passports.

¹³Veterans also previously could select gender identity for their medical health records. According to VA officials, veterans benefit programs generally do not require information or updates regarding a veteran's gender. IRS does not collect gender data from taxpayers.

¹⁴Office of Personnel Management, *Guide to Processing Personnel Actions*, Chapter 20: Name Change (Apr. 18, 2023), and *The Guide to Personnel Recordkeeping*, Chapter 4: How to Reconstruct a Personnel Folder, Update 13a (July 1, 2017). OPM's authority to prescribe reporting requirements covering personnel actions is found at 5 C.F.R. § 9.2. See also 5 U.S.C. § 2951.

employee's electronic Official Personnel Folder (eOPF).¹⁵ Federal employees are responsible for notifying additional offices across their agencies of their legal name changes (see fig. 2). An average of 14,331 employees across the federal government submitted requests for name changes at their employing agencies annually from fiscal year 2019 through 2023.

Figure 2: Overview of the Name Change Process for Federal Employees



Source: GAO analysis of agency information and elizaliv/likiry GR/gheatza/alekselveprev/pandavector/Stock/Vector/stock.adobe.com (graphics). | GAO-25-107045

In March 2023, OPM issued Guidance Regarding Gender Identity and Inclusion in the Federal Workplace. 16 The guidance encouraged agencies

¹⁵OPM requires federal agencies to maintain an Official Personnel Folder containing permanent records for an individual's federal employment career, which is part of a government-wide system of records. For example, an employee's eOPF may include records from working at multiple federal agencies.

¹⁶OPM issued *Guidance Regarding Gender Identity and Inclusion in the Federal Workplace* in response, in part, to Executive Order 13988, *Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation*, 86 Fed. Reg. (Jan. 25, 2021). Executive Order 13988 was rescinded by the Trump administration through Executive Order 14148, 90 Fed. Reg. 8237 (Jan. 28, 2025), and Executive Order 14168, 90 Fed. Reg. 8615 (Jan. 30, 2025).

to create or update their agency-level policies on gender identity inclusion and provided the following information, among other practices:

- Legal name changes. Legal name changes related to gender identity
 were to be handled in the same way as any other legal name change
 in the employee's eOPF and other employee records (e.g., pay
 accounts and benefits documents).
- **Pronouns.** All employees were to be addressed by the names and pronouns they used to describe themselves.
- Workplace practices. Each agency was to establish its own internal
 policies and procedures to support transitioning employees consistent
 with OPM's guidance, agency-specific organizational structures, and
 the individualized needs of the transitioning employee. For example,
 the policies were to address the type of support a transitioning
 employee could expect from supervisors, managers, human
 resources personnel, and agency employee support services.

Federal guidance related to gender identity changed in January 2025. Specifically, the President issued Executive Order 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government, and Executive Order 14148, Initial Rescissions of Harmful Executive Orders and Actions.¹⁷ The orders revoked previous agency policies implementing diversity, equity, and inclusion, such as OPM's gender identity and inclusion practices.

According to Executive Order 14168, all agencies shall remove all statements, policies, regulations, forms, communications, or other internal and external messages that promote or otherwise inculcate gender ideology, and shall cease issuing such statements, policies, regulations, forms, communications or other messages. OPM subsequently removed references to gender transition in its Guide for Processing Personnel Actions, effective February 2025.

¹⁷Executive Order 14168, *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*, 90 Fed. Reg. 8615 (Jan. 30, 2025), and Executive Order 14148, *Initial Rescissions of Harmful Executive Orders and Actions*, 90 Fed. Reg. 8237 (Jan. 28, 2025).

¹⁸Executive Order 14168, 90 Fed. Reg. 8615 (Jan. 30, 2025).

In further support of this executive order, OPM's initial guidance to agencies required agency heads to implement certain steps, including:19

- Reviewing all agency forms that require entry of an individual's sex and ensuring that all forms list male or female only, and not gender identity.
- Ensuring all applicable policies and documents, including forms, use the term "sex" and not "gender."
- Disbanding or canceling any employee resource groups or special emphasis programs that encourage or promote gender ideology or have done so in the past.
- Reviewing agency email systems such as Outlook and turning off features that prompt users for their pronouns.

In subsequent guidance, OPM directed agencies to provide a progress report on steps that they have taken to implement Executive Order 14168 within the workplace, including reviewing and revoking any and all agency personnel policies that reflected or promoted gender ideology.²⁰

Selected Agencies
Generally Followed
OPM's Guidance for
Administering Name
and Gender
Changes, but
Employees Found the
Process Challenging

During our period of review, we found that all four selected agencies—State, SSA, IRS, and VA—had procedures for processing required personnel actions for employees who legally changed their names in accordance with OPM guidance.²¹ Three of the four selected agencies—State, SSA, and VA—also had procedures following OPM guidance in place at the time for processing gender identity changes to their

¹⁹Office of Personnel Management, *Initial Guidance Regarding President Trump's Executive Order Defending Women* (Jan. 29, 2025).

²⁰Office of Personnel Management, *Updated Guidance Regarding Executive Order* 14168, *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (July 10, 2025).

²¹We collected information and documentation for our review from September 2023 to December 2024. See Office of Personnel Management, *Guide to Processing Personnel Actions*, Chapter 20: Name Change (Apr. 18, 2023).

employees' Official Personnel Folders.²² IRS did not follow OPM's procedures and make changes related to gender. Employees who participated in our focus groups and interviews at each of the selected agencies said they found it challenging to navigate their respective agency's name and gender change processes. They attributed the challenges to their agencies' lack of comprehensive guidance specifying details of the processes and to their agencies' lack of a streamlined approach to help employees make the updates. In addition, none of the selected agencies were fully aware of challenges faced by employees who requested these changes because agencies did not utilize specific feedback mechanisms to solicit feedback on the entirety of their name and gender change processes.

Selected Agencies Generally Followed OPM's Guidance for Processing Name Changes

The internal guidance of all four of the selected agencies generally followed OPM guidance for updating names in employees' eOPFs during our period of review from September 2023 to December 2024.²³ OPM's guidance for processing name changes required agencies to accept and process an employee's request for a name change after marriage, divorce, gender transition, or court action.²⁴ Agencies were to obtain acceptable proof of the name change, which could be any document that gave reasonable assurance of the appropriateness of the action.

OPM guidance then instructed agencies to complete the Standard Form 50 Notification of Personnel Action and record the new name on the label of the employee's Official Personnel Folder and on all the employee's other records, including agency locator files, etc.²⁵ Selected agencies' internal agency guidance instructed staff to review and verify employee documentation for a legal name change before recording the new name

²²See Office of Personnel Management, *The Guide to Personnel Recordkeeping,* Chapter 4: How to Reconstruct a Personnel Folder, Update 13a (July 1, 2017).

²³See Office of Personnel Management, *Guide to Processing Personnel Actions*, Chapter 20: Name Change (Apr. 18, 2023).

²⁴Id. The requirement that agencies process name changes due to gender transition has since been removed due to Executive Order 14168. See 90 Fed. Reg. 8615 (Jan. 30, 2025). We discuss this in the next section below.

²⁵Office of Personnel Management, *Guide to Processing Personnel Actions*, Chapter 20: Name Change (Apr. 18, 2023). According to OPM guidance, agencies should advise the employee that each state has laws that govern legal names and that eOPF name changes are not considered legal name changes under state law. Agencies should also confirm that the employee has reported the name change to SSA before processing a change to the eOPF. Agencies may accept the employee's assurances that they notified SSA.

in the employee's eOPF.²⁶ For example, IRS employees submitted requests to IRS's Human Capital Office (HCO) through IRS's internal human resources (HR) system. HCO staff reviewed the name change requests to verify that employees provided legal documentation of the name change. Once verified, HCO processed the request and future employee records reflected the legal name change.

Three of the Four Selected Agencies Generally Followed OPM's Prior Guidance for Processing Gender Changes

Electronic Official Personnel Folder

The electronic Official Personnel Folder (eOPF) contains records for an individual's federal employment career and is accessible online. The eOPF is part of the Office of Personnel Management's government-wide system of records

Source: GAO analysis of OPM documention. | GAO-25-107045

OPM's prior guidance for processing gender changes required agencies to obtain acceptable evidence of an employee's identity in the new gender or a change in gender identity before making the appropriate change to the employee's records.²⁷ During the time period covered by our review (2023-2024), the internal agency guidance of State, SSA, and VA provided that an employee's eOPF may be updated to reflect changes in gender identity.²⁸ However, IRS did not update employees' eOPFs to reflect changes in gender identity. Although IRS allowed its employees to self-initiate changes to their gender markers in IRS's internal human resources system, IRS officials told us that these employee-initiated gender marker changes were not sent to IRS's Human Capital Office for processing, nor did agency human capital staff update employee eOPFs with this information. IRS officials stated that an employee would need to make a specific request for a gender change on their eOPF, but there was no IRS guidance informing employees how to make such a request and changes made in IRS's internal system were not treated as requests to update the eOPF.29

While we found that IRS did not make changes to employee eOPFs related to gender during the period of our review, no action is needed to address this issue in light of the issuance of Executive Order 14168.

²⁶According to OPM guidance, the agency may accept any document that gives reasonable assurance of the appropriateness of the action. Office of Personnel Management, *Guide to Processing Personnel Actions*, Chapter 20: Name Change (Apr. 18, 2023).

²⁷Office of Personnel Management, *The Guide to Personnel Recordkeeping*, Chapter 4: How to Reconstruct a Personnel Folder, Update 13a (July 1, 2017).

²⁸Office of Personnel Management, *The Guide to Personnel Recordkeeping*, Chapter 4: How to Reconstruct a Personnel Folder, Update 13a (July 1, 2017). This guidance provided agencies with instructions to reconstruct an employee's personnel folder to reflect a change in gender identity.

²⁹IRS officials told us a 2014 memorandum to all heads of offices included a section referring to OPM guidance for updating an employee's eOPF to reflect a change in gender. Further, IRS officials stated IRS's Human Capital Office had not received any requests for gender changes to an employee's eOPF.

Further, IRS officials stated that the agency is in the process of assessing its guidance, policies, and procedures in response to recent executive branch actions, including Executive Order 14168.

Selected Agencies'
Employees Found It
Challenging to Navigate
Name and Gender
Change Processes, and
Selected Agencies Did Not
Collect Feedback on
These Processes

Employees Reported
Challenges Due to a Lack of
Comprehensive Agency
Guidance and Numerous
Required Steps

Two of the four selected agencies—SSA and VA—lacked comprehensive guidance documenting an employee's responsibilities to effectively complete all of the steps required to request a name change, including what to expect regarding timing. For example, SSA used its internal agency web page to provide employees with limited information on requesting name changes. SSA's web page instructed employees to ask their supervisors to initiate requests for a personnel action to reflect any name changes once employees updated their Social Security records. However, the web page did not specify the additional and multiple steps that employees should take to complete the name change process. For instance, it did not include steps an employee must take to update their name on agency IT systems or additional actions required to update agency identification credentials.

We found that none of the selected agencies utilized a process that allowed employees to change their names with a single request. Instead, agency employees were responsible for independently contacting various and multiple agency offices to ensure their personnel records were changed, updating their information throughout the agencies' various IT systems—such as agency identification credentials, email addresses, and business cards—and notifying those responsible for building security and identification credentials.³⁰

³⁰We also found that employees may need to identify points of contact within offices or make multiple requests to a single office, such as updates for additional agency systems.

Employee quote

"I had [people] calling me by my former name. You can imagine that when you're divorced, you really don't want to see your former name, whether or not the experience was good or bad. One person should be responsible for handling your case and changing everything in all the systems."

Source: GAO's focus groups and interviews with selected agencies' employees. | GAO-25-107045

Employee quote

"I think there should be a checklist. But there are so many systems that we deal with, and they are not all [in] one place... There's no centralized [system], it is so spread out, so broken, because nobody communicates with anybody. HR doesn't communicate with IT. There are so many sections of IT that nobody talks to everybody during the process... It's so not fluid. It's so complicated."

Source: GAO's focus groups and interviews with selected agencies' employees. | GAO-25-107045

VA employees in both of our focus groups told us they encountered difficulties after verifying their legal name changes in the human resources system with subsequent requests to update additional agency records. They attributed the difficulties to reasons such as the absence of a central point of contact to facilitate the name change process and the lack of a centralized system to reflect the name change on all applicable agency records.³¹

We asked employees in our focus groups and interviews at each of our selected agencies to describe the guidance or resources available to employees for the name change process, including their accuracy, completeness, and clarity. In all our focus groups and nearly all our interviews (12 out of 14), employees said they experienced challenges navigating their respective agency's name change processes due to the lack of or insufficient guidance at their agencies.³² In most focus groups, participants attributed inconsistencies in their employee records to the lack of or insufficient agency guidance.

We also asked employees in our focus groups and interviews to describe what went well and what challenges they faced and whether opportunities existed to improve the name change process. In all of our focus groups and nearly all interviews (13 out of 14) across the selected agencies, employees described numerous negative work-related effects, including difficulties accessing agency systems, which they attributed to a lack of or insufficient guidance. For example, according to an IRS employee, they were unable to log in to their agency's network because their email address had not been updated to align with their requested name change. They explained that the agency's name change guidance did not provide instructions for updating email addresses. In addition, a VA employee cited a similar challenge they believed ultimately affected patient care because they could not sign into relevant agency systems to perform related work functions. Moreover, employees in all our focus groups and in most of our interviews generally stated that the name change processes should be streamlined.

During our review, we heard similar challenges from employees who had requested to update their genders on their records using agencies' prior processes for requesting a change in gender identity. IRS and VA lacked

³¹See figure 2 for an overview of employee name change processes at selected agencies.

³²We conducted focus groups at State prior to the issuance of its document on name changes in November 2024.

a comprehensive document covering all the steps an employee would have needed to take to request a gender change and expectations regarding timing. VA previously had an employee transition guide in place, which stated that a transitioning employee's eOPF and other records should be updated to reflect an employee's new name and gender.³³ However, the guide did not provide information on timing, nor did it provide employees with specific instructions on the process steps for changing gender markers on VA records.

Employee quote

"The name change process resulted in several weeks of work slowdown and even work stoppage and that is a waste of taxpayer resources."

Source: GAO's focus groups and interviews with selected agencies' employees. | GAO-25-107045

In most of our interviews, employees who had previously changed their names and genders told us they experienced emotional toll or stress related to their agency's inadequate documentation of name and gender change processes. Employees in most of our interviews also stated that requested name and gender changes generally were not completed in a timely manner. We discuss selected agencies' awareness of employee feedback in the next section.

According to selected agencies, employees were responsible for ensuring their requested name changes were processed completely. Agency officials at each of these agencies stated that name change requests generally involve multiple offices, and each office has ownership of its respective piece of the process. IRS officials told us that their employees could search the agency's intranet web page to locate information on the process. However, the information IRS provides via its intranet is contained across multiple web pages and did not include the steps, for example, that employees must take to update their names on agency computer systems. In April 2025, IRS updated and republished an internal web page that instructs employees on the steps to request name changes on personnel records, security credentials, and email address.³⁴ This internal web page was not available to employees during our period of review.

During our review, State developed a comprehensive guidance document that details the multistep name change processes for employees,

³³Department of Veterans Affairs, VA Handbook 5975.4 (June 15, 2017).

³⁴According to IRS, it updated its guidance for employees in response to our review. In April 2025, IRS officials told us it is in the process of assessing its guidance, policies, and procedures related our review and in response to Executive Order 14168, *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*, or Executive Order 14148, *Initial Rescissions of Harmful Executive Orders and Actions*.

including expected timelines.³⁵ According to State, the agency conducted listening group sessions where it recognized its processes could be confusing and frustrating for employees. According to State, its new guide is meant to help employees successfully navigate the multiple steps required to complete the entire name change process. Federal standards for internal control state that agency management must document the responsibilities of the organization, such as instructions for name changes, and select appropriate methods to communicate internally. These documents must have the appropriate level of detail to allow management to effectively monitor their responsibilities and be readily available to employees when needed.36 Without comprehensive documentation that clearly communicates the process for completing name changes, federal employees' abilities to complete work tasks could be adversely affected. As a result, the public's needs may go unmet as affected federal employees with public-facing responsibilities may be prevented from carrying out certain tasks related to their jobs.

Selected Agencies Lacked a Complete Feedback Mechanism, Contributing to Employee Challenges with the Name and Gender Change Process None of the selected agencies—IRS, SSA, State, and VA—employed specific, systematic mechanisms to capture employee feedback and address potential pain points experienced by employees navigating the entirety of the name change process. The extent to which selected agencies solicited employee feedback on portions of the process varied at each selected agency. While SSA officials told us they had no knowledge of any steps the agency had taken to collect feedback from employees related to the name change process, State officials said they conducted listening sessions with employees, which contributed to the issuance of the agency's new name change process guidance. State officials told us that they had no plans to collect additional feedback, such as whether State's new name change guide is working as intended, or to capture information about employees' experiences not covered by generic surveys sent after interactions with HR or IT staff.

³⁵While State's original guide included references to additional steps that an employee may take to change their gender identity, State officials told us that these have since been removed.

³⁶Principles 12.02, 12.03, 12.04, and 14.07. GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

Employee quote

"I would probably say that the IT portion of the name change process is extremely difficult and not at all streamlined. To be honest, there was not much support [from agency staff] at all in getting issues resolved. That is the biggest thing. IT [updates] should not be this hard. I cried during this process so many times."

Source: GAO's focus groups and interviews with selected agencies' employees. \mid GAO-25-107045

Employee quote

"There was no real sound or clear instruction on the several systems to change the name in. I didn't even know about changing my name on Outlook and Teams, I assumed when they updated in the directory that everything else would be changed. One [agency] system is updated, but nothing else."

Source: GAO's focus groups and interviews with selected agencies' employees. | GAO-25-107045

Employee quote

"If there was a way to submit your name change information without going through your supervisor — that would be a lot more comfortable for a lot of people. I know there are people who are not comfortable around their supervisor ...[Employees would be more comfortable with] an electronic direct input form to HR that would allow you to change and put the reasons for the change in your own way."

Source: GAO's focus groups and interviews with selected agencies' employees. | GAO-25-107045

During our focus groups and interviews at each of our four selected agencies, we asked employees how they implemented the various steps of the name change processes. Participants in nearly all of our focus groups (seven out of eight) provided feedback related to challenges navigating HR, IT, or security steps, including describing interactions with agency staff as not helpful.

Specifically, participants in all our groups cited IT challenges such as instances where their display names or emails remained unchanged after going through the name change process. IRS employees said it was a challenge simply getting their names updated across all agency systems.

Employees we interviewed told us they faced similar challenges navigating the former process to change gender on their records and specifically cited IT challenges. In addition, employees in some of our interviews expressed privacy and confidentiality concerns when the gender change process required the involvement of supervisors in making and processing change requests (see appendix III for suggestions from selected agencies' employee groups and external stakeholders to help improve agencies' name and gender change processes).

The Office of Management and Budget (OMB) advises federal agencies to manage employee experiences and engage employees in improvement activities—such as ways to improve the process for name changes—by capturing, analyzing, and addressing employee pain points

to improve service delivery.³⁷ OMB's guidance directs agencies to increase their understanding of customers' needs and measure continuous improvement of federal services to better meet customers' priorities. In addition, the guidance is meant to ensure that federal service providers are receiving and acting upon customer feedback to drive performance improvement. Further, our prior work has identified using evidence, such as feedback, as a key practice for evidence-based decision-making.³⁸

Without a feedback mechanism to collect employees' views on the process for changing their names, selected agencies are missing opportunities for improvement, such as addressing employee pain points. Selected agencies could improve service delivery and provide a better experience for employees by implementing a specific feedback mechanism to capture complete information about the name change process.

Conclusions

Millions of individuals and thousands of federal employees change their legal names every year. Selected agencies followed OPM guidance for processing employees' name changes. However, participants in our focus groups and interviewees from selected agencies reported that they found these processes challenging to navigate. State and IRS have since developed guidance to assist employees with the name change process. By developing detailed guidance on their respective name change processes, SSA and VA can help their employees navigate the process. This will help ensure employee records are updated consistently, and employees are able to access agency systems needed to complete their work. In addition, each selected agency lacked specific mechanisms for soliciting employee feedback on the whole name change process. By collecting employee feedback, agencies can learn about their employees' challenges with their name change processes and potentially improve employee experiences by addressing the pain points.

³⁷Office of Management and Budget, *Preparation, Submission, and Execution of the Budget, Circular No. A-11, Section 280* (July 2024). OMB's July 2024 update specifically recognizes federal employees as internal customers for agencies. OMB Circular A-11 is normally updated annually and, therefore, may be subject to future changes.

³⁸GAO, Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts, GAO-23-105460 (Washington, D.C.: July 12, 2023).

Recommendations for Executive Action

We are making a total of six recommendations, including two to the Department of Veterans Affairs, one to the Internal Revenue Service, two to the Social Security Administration, and one to the Department of State.

The Secretary of Veterans Affairs should develop comprehensive documentation that clearly guides employees through all steps of the name change process. (Recommendation 1)

The Commissioner of Social Security should develop comprehensive documentation that clearly guides employees through all steps of the name change process. (Recommendation 2)

The Secretary of Veterans Affairs should create a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process. (Recommendation 3)

The Commissioner of Internal Revenue should create a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process. (Recommendation 4)

The Commissioner of Social Security should create a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process. (Recommendation 5)

The Secretary of State should create a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process. (Recommendation 6)

Agency Comments and Our Evaluation

We provided a draft of this report to the Departments of State and Veterans Affairs, Internal Revenue Service, Office of Management and Budget, Office of Personnel Management, and Social Security Administration for review and comment.

In written comments (reproduced in appendix IV), IRS agreed with the recommendation it should create a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process and agreed to develop a mechanism to collect employee feedback on the whole name change process.

In written comments (reproduced in appendix V), SSA agreed with the two recommendations that it 1) develop comprehensive documentation that clearly guides employees through all steps of the name change process and 2) create a specific mechanism for collecting employee

feedback to improve employees' experiences with the whole name change process. SSA said it is developing new guidance on its internal webpage detailing each step of the process and is exploring a new intake system to help streamline document submission, trigger updates across relevant systems, and provide timely notification to employees.

In written comments (reproduced in appendix VI), State did not agree or disagree with our recommendation that State should create a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process. However, State said it is reviewing the feedback mechanisms the Department currently has in place and any adjustments that may be needed.

In written comments (reproduced in appendix VII), VA disagreed with the two recommendations that it 1) should develop comprehensive documentation that clearly guides employees through all steps of the name change process and 2) that it should create a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process. VA stated it provided documentation during our review that guides employees through all steps of the name change process. VA also stated it collects feedback from employees on their experience with VA's human resources systems and makes improvements to VA's processes and documentation based on the employee input. Included with its written comments, VA provided a job aid recently updated as of April 28, 2025, that VA said walks employees through the process of changing their name.

We continue to believe that comprehensive documentation would improve VA employee experiences navigating the name change process. We recognize that VA's job aid guides employees through the human resources portion of the name change process and that, according to VA, this information is shared with other human resources systems, such as those for employee timekeeping and pay. However, it does not provide comprehensive information and instructions VA employees need to complete the entire name change process. As stated in the report, employees are responsible for contacting multiple agency offices to help ensure their name changes are completely and accurately reflected across all their records, including agency identification credentials, email addresses, and various agency computer systems, in addition to their HR records. VA employees in both focus groups told us they encountered difficulties after verifying their legal name changes in VA's HR system with subsequent requests to update additional agency records.

VA also cited our IRS example where we highlighted how employees submit requests to IRS's Human Capital Office (HCO) through IRS's internal HR system. In our example, IRS's HCO staff review the name change request to verify that employees provided legal documentation of the name change, and once verified, HCO processed the request and future employee records reflect the legal name change. According to VA, this is the same process used in VA, but VA noted that IRS did not receive a similar recommendation. Unlike VA and as we explain in this report, in April 2025, IRS updated and republished an internal web page that instructs employees on the specific steps to request name changes on personnel records, security credentials, and the employee's email address, providing the type of resource employees previously told us they lacked. VA does not provide a similar resource to its employees, which led to our recommendation.

VA also disagreed with our recommendation that it should create a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process. VA's job aid shows that employees can provide feedback or raise issues via its "Need Help" portal within the internal HR system. VA explained that through this portal, its service desk can review and codify trends, reach out to and assist VA employees, and if needed, update capabilities and processes. VA stated that this capability is available for name changes and all other processes within the HR system. VA also said that its Office of Chief Human Capital Office SharePoint site includes a section through which feedback is received, reviewed, and responded to on a regular basis.

We continue to believe that a specific mechanism for collecting employee feedback to improve employees' experiences with the whole name change process can help capture complete information about challenges faced by VA employees. VA's contact mechanisms provide employees general opportunities to provide feedback related to the HR portion of the name change process. Our recommendation calls for specific, systematic mechanisms to capture employee feedback and address potential pain points experienced by employees navigating the entirety of the name change process and not only its HR component. Doing so could improve service delivery and provide a better experience for VA employees.

IRS, SSA, and VA also provided technical comments, which we incorporated into the report as appropriate. OPM stated that it had no comments on our draft report. OMB did not respond to our request for comments.

We are sending copies of this report to the appropriate congressional committees, the Secretary of State, the Secretary of Veterans Affairs, the Commissioner of Internal Revenue, the Director of the Office of Management and Budget, the Director of the Office of Personnel Management, and the Acting Commissioner of Social Security. In addition, the report will be available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at 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 VIII.

//SIGNED//

Dawn G. Locke Director, Strategic Issues

Appendix I: Objectives, Scope, and Methodology

Our objective was to examine the extent to which four selected agencies followed Office of Personnel Management (OPM) guidance for name and gender changes, including the views of federal employees on the name and gender change processes at their respective agencies. We collected information on the name and gender processes during our review period from September 2023 to December 2024. Throughout this report, our findings reflect the conditions that existed at the time of our analysis as well as employee and agency perspectives related specifically to name and gender changes. However, we provide only descriptive information with respect to gender changes and do not make related recommendations in light of recent policy changes, namely, the issuance of Executive Order 14168 in January 2025.

To address our objective, we selected a nongeneralizable sample of four federal agencies for our review: the Departments of State and Veterans Affairs, the Internal Revenue Service, and the Social Security Administration.² We initially reviewed a public list of federal agencies to notify of a legal name change.³ We narrowed this list to large or very large agencies based on the number of employees (10,000 or more) reported in OPM's Federal Employee Viewpoint Survey, which we hypothesized would likely have more employees who had requested name changes and would facilitate our efforts to identify volunteers to participate in focus groups.

We also looked for agencies on the list that administered public benefits or services at the federal level and had higher volumes of interactions with the public involving personally identifying information, such as name and gender, on federal records (e.g., Social Security records, passport, etc.). Since our selection, we narrowed our scope to name and gender change processes for federal employees at our selected agencies. We present information about the public processes for individuals, including federal employees, on making name and gender changes in appendix II.

¹In this report, the gender change process at selected agencies refers to an employee's request to change their gender identity.

²We originally selected another agency, the Department of Health and Human Services, but did not hold focus groups and interviews with its employees. We determined that excluding this agency from our scope did not present a significant limitation.

³General Services Administration, "How to change your name and what government agencies to notify," USAgov, last modified February 2, 2024, https://www.usa.gov/name-change.

At each of our selected agencies, we reviewed documentation related to the name and gender change processes in place at the time of our analysis. We evaluated this information against relevant government-wide guidance and principles related to documentation from the Standards for Internal Control in the Federal Government.⁴ We also interviewed knowledgeable agency officials on the name and gender change processes for their employees.

To provide context for our review, we obtained record-level data from OPM's Enterprise Human Resources Integration system (EHRI) on the number of name changes processed for federal employees at each selected agency and government-wide for fiscal years 2018 through 2023, the most current data available at the time. To assess data reliability, we reviewed relevant OPM documentation for EHRI and obtained written responses from OPM officials. We used these data to calculate an average number of name change requests per fiscal year. In addition, we requested summary data from each selected agency on the number of name change requests received from external customers. We determined that the data were sufficiently reliable for the purpose of providing background and context on the number of name change requests. We also requested data from each selected agency on the number of employee requests for gender changes, but agencies told us they generally did not track this information.

To obtain the views of federal employees on the name and gender change processes prior to January 2025, we conducted a series of focus groups and interviews with employees at our selected agencies. We identified potential participants for the focus groups by requesting a list of employees at each selected agency who completed a name change within the last 2 calendar years (2022 and 2023). We randomly selected employees from these lists and solicited volunteers to participate in one of two virtual focus groups per agency for a total of eight focus groups held from May to July 2024. The number of participants attending our focus groups ranged from five-to-seven employees per group. Trained facilitators moderated the virtual focus group discussions over

⁴Office of Personnel Management, *Guide to Processing Personnel Actions*, Chapter 20: Name Change (Apr. 18, 2023); *Guidance Regarding Gender Identity and Inclusion in the Federal Workplace* (Mar. 31, 2023); and *The Guide to Personnel Recordkeeping*, Chapter 4: How to Reconstruct a Personnel Folder, Update 13a (July 1, 2017); Office of Management and Budget, *Preparation, Submission, and Execution of the Budget, Circular No. A-11*, *Section 280* (July 2024); and GAO, *Standards for Internal Control in the Federal Government*, Principles 12.02 and 12.03, GAO-14-704G (Washington, D.C.: September 2014).

videoconferencing software (Zoom or Microsoft Teams) by following a structured guide with open-ended questions about the participants' experiences with the name change process. We discussed topics including guidance and resources provided by the employee's agency, implementation of steps for name changes at the employee's agency, and experiences with name changes at other federal agencies. We asked participants about what went well with these topics, in addition to what challenges they experienced and opportunities for improvement.

We also met with selected agencies' lesbian, gay, bisexual, transgender, or queer employee groups to collect background information and request assistance identifying employees to volunteer for one-to-two virtual interviews per agency on individual experiences with their agency's name and gender change process. We conducted a total of seven virtual interviews over videoconferencing software with 14 interviewees (one-to-five employees per interview) from August to October 2024. The team conducted the interviews using a similar structured guide with openended questions. We discussed the same topics but addressed participants' experiences with changing their names and genders.

We performed a content analysis on the data collected from the focus groups and interviews respectively to identify the top common themes. To do this, we started by working together as a team to develop an initial coding scheme by reviewing our notes to identify common themes, including adding definitions and examples for each theme. We iteratively tested and refined our initial coding scheme by conducting several pretests where two coders independently coded a small sample of the notes. Once we finalized the coding scheme, two independent coders conducted the full analysis of focus group notes. When the two coders disagreed, the coders met to discuss the coding and come to a final decision. We analyzed the results of our analysis to identify the top themes discussed in each focus group and then counted the frequency of the themes that emerged across all the focus groups. We conducted the same analysis for our interviews using a similar classification scheme and counted the themes that occurred across interviews. We report only on the most frequently occurring themes identified from our content analysis.

⁵We met with existing employee resource groups or special emphasis programs at selected agencies prior to the issuance of Executive Order 14168, 90 Fed. Reg. 8615 (Jan. 30, 2025), OPM's *Initial Guidance Regarding President Trump's Executive Order Defending Women* (Jan. 29, 2025), and OPM's *Updated Guidance Regarding Executive Order 14168*, *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (July 10, 2025).

Appendix I: Objectives, Scope, and Methodology

When reporting on the top themes, we used "most" to indicate when a theme occurred in more than half of the groups or more than half of the interviews we conducted. We used "some" to indicate when a theme occurred in more than a quarter of the groups or interviews. We designed the focus groups and interviews to obtain in-depth information about our specific topics of interest. The results are not generalizable and represent only the views of those employees who participated in our focus groups or interviews.

Additionally, we interviewed OPM and Office of Management and Budget officials to obtain government-wide perspectives on name and gender change processes at federal agencies. We also interviewed selected external stakeholders who help transgender individuals navigate the process of changing name and gender on federal records. To select a nongeneralizable sample, we identified organizations that focused on transgender-related policies and offered resources to transgender individuals, such as legal aid.

We conducted this performance audit from September 2023 to August 2025 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Processes for External Customers at Selected Agencies

Table 1: Name Change Pro	Table 1: Name Change Process for External Customers at Selected Agencies as of May 2025			
Department of State - Passport	Department of Veterans Affairs (VA) – Health Care Records ^a	VA – Benefits Records ^a	Internal Revenue Service (IRS) – Individual Tax Records	Social Security Administration (SSA) – Social Security Card
Individuals complete an application form and collect required documentation—their most recent passport (or evidence of citizenship if not renewing by mail) and a valid ID, an original or certified document showing the name change, and a passport photo.	If a veteran uses VA health care, they complete an amendment request form or submit a letter requesting an update to their health care records. The request must be in writing along with two forms of identification that show their birthdate and new legal name. Veterans may submit a name change request inperson, by mail to their VA medical facility, or by submitting the required documentation in My HealtheVet secure messaging.	If a veteran receives direct benefit payments, they must make a written request for an update to their benefit records including a copy of unexpired government-issued photo identification that shows their birthdate and new or old legal name, and documentation based on the reason for the name change. Veterans make a request in person, online, or by mail depending on the benefit program office.	Not applicable—IRS directs individuals to report name changes to SSA.	Individuals complete an application for a Social Security card and collect required documentation—an unexpired ID and proof of name change. Individuals whose name change is based on marriage may be able to complete their requests entirely online if they meet the established criteria. Other individuals or those without internet access can schedule an appointment with a local Social Security office to submit their required documents.
Depending on circumstances, individuals may have the option of visiting a passport acceptance facility or sending documents by mail. State also may collect a renewal application fee (\$130) and, if desired, an expedited service fee (\$60). State posts the current processing times on its website for routine and expedited service. Applicants receive their new passports in the mail.	A Veterans Health Administration directive states amendment requests should be completed within 30 days and no later than 90 calendar days. The veteran receives a written notification after their requested name change has been completed.	Processing time varies by benefits office.		There is no fee for a replacement Social Security card. According to SSA, applicants typically receive new Social Security cards in the mail within 2 weeks.

Source: GAO analysis of agency information. | GAO-25-107045

^aA veteran also may need to contact the Defense Manpower Data Center to update their information in the Defense Enrollment Eligibility Reporting System.

Appendix II: Processes for External Customers at Selected Agencies

Department of State - Passport	Department of Veterans Affairs (VA) – Health Care Records	VA – Benefits Records	Internal Revenue Service (IRS) – Individual Tax Records	Social Security Administration (SSA) – Social Security Card
Individuals could complete the same application for a passport and provide required documentation. Individuals did not need to provide evidence for requesting a gender change.	Veterans could add or change their gender identities on their electronic health records by updating their va.gov accounts or in-person at their VA medical facility. Veterans also could change their birth sexes by completing the same process as changing their names with additional supporting documentation, such as a letter from their medical provider.	Not applicable— Veterans Benefits Administration officials stated that benefits offices generally do not collect gender data from veterans.	Not applicable—IRS does not collect gender data.	Individuals could complete the same application for a Social Security card and provide required documentation—an unexpired ID. Individuals did not need to provide evidence for requesting a gender change.

Source: GAO analysis of agency information. | GAO-25-107045

^aIn January 2025, Executive Order 14168 directed federal agencies to recognize two biological sexes—male and female—and rejected the concept of changeable gender identity for identification documents and personnel records.

Appendix III: Suggestions for Additional Actions to Improve the Name and Gender Change Processes

During the course of our work in 2024, we collected information from selected agencies' employee groups and external stakeholders about challenges and opportunities with the name and gender change processes as outlined in the table below.

Table 3: Suggestions from Employee Groups and External Stakeholders for Improving the Name and Gender Change Processes

Suggestiona	Examples
Centralized process	Having one federal agency serve as the "one stop shop" for name and gender changes across the federal government, such as the Social Security Administration.
	Developing the capability of a single system within a federal agency to request name and gender changes from employees rather than requiring multiple requests because systems do not share information.
Self-attestation	Accepting self-attestation to change an individual's gender identity on federal records instead of requiring documentation of the new gender, such as medical certification.
Nonbinary gender marker option	Offering a nonbinary "X" gender marker option on all rather than some federal records.
Additional training	Providing additional training for all employees to facilitate a greater understanding of gender identity and inclusivity.

Source: GAO analysis of interviews with employee groups and external stakeholders. | GAO-25-107045

^aEmployee groups and stakeholders provided these perspectives during interviews conducted in 2024. In January 2025, Executive Order 14168 directed federal agencies to recognize two biological sexes—male and female—and rejected the concept of changeable gender identity for identification documents and personnel records. The Office of Personnel Management's subsequent guidance instructed agencies to disband or cancel any employee resource groups that encourage or promote gender ideology or have done so in the past.

Appendix IV: Comments from the Internal Revenue Service



DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE WASHINGTON, DC 20224

06/25/2025

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

Dear Ms. Locke:

Thank you for providing the draft report entitled "Federal Workforce Selected Agencies Need to Improve Employee Name Change Process," (GAO-25-107045, Audit number 107045). We appreciate the opportunity to review and respond to the draft.

We are pleased that the Government Accountability Office (GAO) recognizes that IRS procedures for processing requested personnel actions for employees who legally changed their names are in accordance with the Office of Personnel Management requirements. We appreciate GAO's thorough observation of our operations related to updating names in the electronic Official Personnel Folder. Your analysis offers meaningful clarity on the challenges employees reported when completing the name change process. We value your recognition of the comprehensive communication that we developed to assist IRS employees in completing the name changes process. We are taking steps to develop a more robust mechanism for collecting this valuable employee feedback on the entirety of the name change process.

The report accurately reflects our operations and provides helpful insights. We agree with the report findings and recommendations.

Our response to your specific recommendation is enclosed. We provided technical comments on the draft report separately. If you have questions, please contact me, or a member of your staff may contact David P. Traynor, Acting IRS Human Capital Officer, at David.P.Traynor@irs.gov.

Sincerely,
Dottie A.
Romo
Date: 2025.06.25
Dottie A. Romo
Acting Chief Operating Officer

Enclosure

Appendix IV: Comments from the Internal Revenue Service

Enclosure GAO Recommendation and the IRS Response to Draft Report GAO-25-107045 Federal Workforce Selected Agencies Need to Improve Employee Name Change Process (Job Code #107045) Recommendation 4: The Commissioner of Internal Revenue should create a specific mechanism for collecting employee feedback in an effort to improve employees' experiences with the whole name change process. <u>Comment:</u>
The IRS agrees with Recommendation 4. As part of the IRS's commitment to continuous service improvement, we agree to develop a mechanism to collect employee feedback on the whole name change process.

Appendix V: Comments from the Social Security Administration



June 13, 2025

Dawn G. Locke Director, Strategic Issues United States Government Accountability Office 441 G Street, NW Washington, DC 20548

Dear Director Locke,

Thank you for the opportunity to review the draft report, "FEDERAL WORKFORCE: Selected Agencies Need to Improve Employee Name Change Process" (GAO-25-107045). We agree with the recommendations. We remain committed to improving the employee experience and are taking steps to make the name change process easier to navigate.

We are developing new guidance on our internal webpage detailing each step of the process. In addition, we are exploring a new intake system that will streamline document submission, trigger updates across relevant systems, and provide timely notifications to employees. These improvements, initiated by employee feedback, aim to deliver a more efficient, transparent, and user-friendly experience.

Please contact me at (410) 274-0654 if I can be of further assistance. Your staff may contact Amy Gao, Director of the Audit Liaison Staff, at (410) 966-1711.

Sincerely.

Chad Poist Chief of Staff

SOCIAL SECURITY ADMINISTRATION BALTIMORE, MD 21235-0001

Appendix VI: Comments from the Department of State



United States Department of Sta

Washington, D.C. 20520

Kimberly Gianopoulos Managing Director International Affairs and Trade Government Accountability Office 441 G Street, N.W. Washington, D.C. 20548-0001

JUN 1 6 2025

Dear Ms. Gianopoulos:

We appreciate the opportunity to review your draft report, "FEDERAL WORKFORCE: Selected Agencies Need to Improve Employee Name Change Process." GAO Job Code 107045.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

Sincerely,

Jeffrey D. Johnson

Acting Deputy Comptroller for Financial, Audit, and Technology Management Bureau of Comptroller & Global Financial Services

Enclosure:

As stated

cc: GAO – DawnG. Locke OIG - Norman Brown

Department of State Response to GAO Draft Report

FEDERAL WORKFORCE: Selected Agencies Need to Improve Employee Name Change Process (GAO-25-107045, GAO Code 107045)

Thank you for the opportunity to comment on the GAO draft report, "Federal Workforce: Selected Agencies Need to Improve Employee Name Change Process."

The Department of State processes legal name change requests that may arise for a variety of reasons including, but not limited to, marriage, divorce, or personal preference. The Department of State does not process gender change requests and adheres to Executive Order 14168, Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government, and OPM's Initial Guidance Regarding President Trump's Executive Order Defending Women.

Recommendation 6: The Secretary of State should create a specific mechanism for collecting employee feedback in an effort to improve employees' experiences with the whole name change process.

Department Response: The Department of State acknowledges the recommendation from GAO and is reviewing the feedback mechanisms the Department currently has in place and any adjustments that may be needed.

Appendix VII: Comments from the Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS WASHINGTON

July 16, 2025

Ms. Dawn G. Locke Director Strategic Issues U.S. Government Accountability Office 441 G Street, NW Washington, DC 20548

Dear Ms. Locke:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: *Federal Workforce: Selected Agencies Need to Improve Employee Name Change Process* (GAO-25-107045).

The enclosure contains technical comments and the action plan to implement the draft report recommendations. VA appreciates the opportunity to comment on your draft report.

Sincerely,

Christopher D. Syrek Chief of Staff

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Enclosure

Enclosure

Department of Veterans Affairs (VA) Response to the Government Accountability Office (GAO) Draft Report Federal Workforce: Selected Agencies Need to Improve Employee Name Change Process (GAO-25-107045)

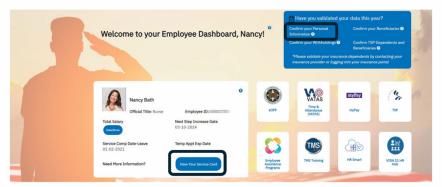
<u>Recommendation 1</u>: The Secretary of Veterans Affairs should develop comprehensive documentation that clearly guides employees through all steps of the name change process.

<u>VA Response</u>: Non-Concur. The Department of Veterans Affairs (VA) disagrees with this recommendation. During the review, VA provided documentation that guides employees through all steps of the name change process. The job-aide is attached and was updated as recently as April 28, 2025. Below is an excerpt from the job-aide that walks employees through the process of changing their name.

It is worth noting that in the draft report, on page 12, GAO lists the Internal Revenue Service (IRS) as an example of how employees submit requests to IRS's Human Capital Office (HCO) through IRS's internal human resources system. HCO staff review the name change request to verify that employees provided legal documentation of the name change. Once verified, HCO processed the request and future employee records reflect the legal name change. This is the same process used in VA. IRS did not receive a similar recommendation. VA requests that this recommendation be removed based on the documentated process in place.

Name Change in HR Smart

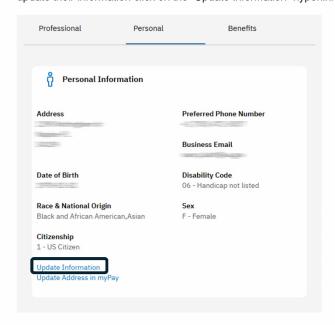
Employees can access their personal information by clicking on the View Your Service Card button or by clicking on the Confirm your Personal Information hyperlink. When an employee hovers over the "Confirm your Personal Information" hyperlink, instructions are provided to the employee to update their information through the service card.



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Service Card – on the service card employees can view their personal information by clicking on the personal information tab at the top of the page. Employees needing to update their information click on the "Update Information" hyperlink.



The edit page opens for the employee. Employees click on the pencil icon to edit the appropriate information.

Enclosure Department of Veterans Affairs (VA) Response to the Government Accountability Office (GAO) Draft Report Federal Workforce: Selected Agencies Need to Improve **Employee Name Change Process** (GAO-25-107045) Personal Information + expand all \times collapse all Nancy Head Nurse Bath 🕖 No Address Entered Mailing Address: Provide this if you prefer to receive mail at an address other than your Home Address. If a Mailing Address is provided, this address (instead of Home Address) will be used on your W2 and provided to the Thrift Savings Plan. Employee Information $\overline{\hspace{1cm}}$ Contact Details **Business** Business **☆** Home 0 ADD A PHONE NUMBER Other 0 othertest@test2.com The edit Name Change page appears with instructions for the employee.

Enclosure Department of Veterans Affairs (VA) Response to the Government Accountability Office (GAO) Draft Report Federal Workforce: Selected Agencies Need to Improve **Employee Name Change Process** (GAO-25-107045) **Change Name** If your name changed as a result of marriage or a court action (divorce or legal name change), submit this request to update your name in your official personnel records. Nancy Head Nurse Bath EFFECTIVE DATE* 06/23/2025 FIRST NAME* PREFIX Nancy LAST NAME* MIDDLE Bath Head Nurse SUFFIX **Attachments** Here are the types of documents you can attach to support your request: Certified marriage certificate Certified record of divorce • Court Order Driver's license Social security card · Social security number application letter Unexpired valid state ID card • U.S. passport There are no attachments. ADD ATTACHMENT CANCEL After submission, the employee sees the following on their personal information page.

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Once this name change is approved an SF50 is processed and sent to eOPF automatically. This information is also passed downstream immediately to other systems, including the Defense Finance and Accounting Service, MyPay, VA Time and Attendance System, and Health Resources Priorities and Allocations System. Attached is a job aide that outlines the complete process. This job aid can be found by all employees in our Talent Experience Knowledge Portal, which is an application in the Talent Experience Platform (TXP).

<u>Recommendation 3</u>: The Secretary of Veterans Affairs should create a specific mechanism for collecting employee feedback in an effort to improve employees' experiences with the whole name change process.

VA Response: Non-Concur. VA does not agree with this recommendation. As reflected by the revised job aide attached, VA collects feedback from employees on their experience with TXP and HR Smart and makes improvements to VA's processes and documentation based on the employee input. HR Smart end-users can provide feedback or raise issues via the "Need Help" portal shown on the next page. Through this portal, the service desk can review and codify trends, reach out and assist VA employees, and if needed, update capabilities and processes. This capability is available for name changes and all other processes in HR Smart. VA's Office of Chief Human Capital Office (OCHO) SharePoint site also includes an Ask the CHCO and Contact Us section through which feedback is received, reviewed, and responded to on a regular basis. VA does recognize the information GAO gathered from VA employees during the focus groups. VA is committed to improving the name change process and will continue to explore with employees, the Administrations, and our Human Resources Information Technology contractor ways to use agentic artificial intelligence and other tools to streamline and reduce the time involved in these changes.





Update Personal Information in My Service Card

This job aid covers how employees can update their personal information on their Service Card. This includes contact information, emergency contacts, ethnicity, and legal name changes. For more information on the Service Card, please see the <a href="https://doi.org/10.1007/job/10.

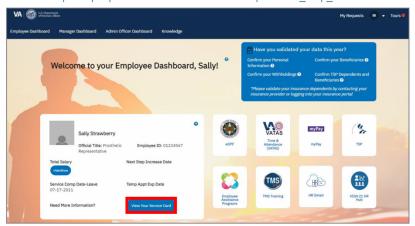
This job aid contains:

- Section 1. Access the Personal Information Page
- Section 2. Submit a Name Change Request
- Section 3. Add/Edit Contact Details
- Section 4. Add/Edit Emergency Contacts
- Section 5. Add/Edit Ethnic Groups
- · Section 6. Additional Links

Section 1. Access the Personal Information Page

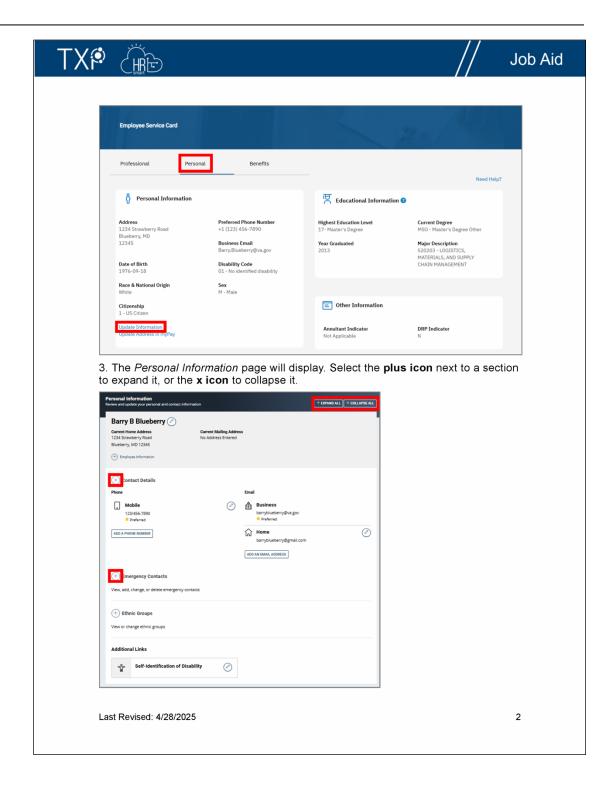
This section provides an overview on how to navigate to the Personal Information page.

1. From the TXP homepage, select the **View Your Service Card** button, or select this link: https://txpvaprd.servicenowservices.com/txp?id=esc_emp_serv.



2. Select the Personal tab, and then select the Update Information hyperlink.

Last Revised: 4/28/2025





Section 2. Submit a Name Change Request

This section provides an overview on how employees can request a name change. Name change requests must be a result of a marriage or other official court action and require supporting documentation.

- 1. Navigate to the Personal Information page.
- 2. Select the pencil icon next to your name.

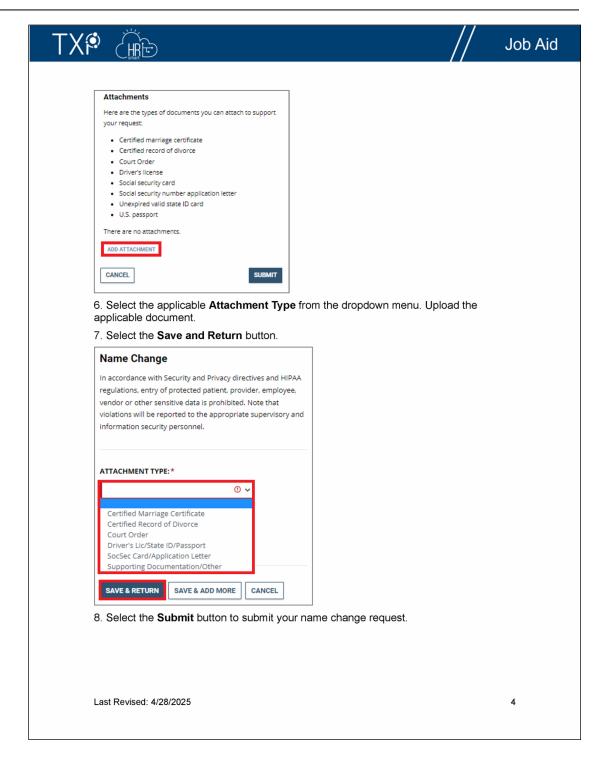


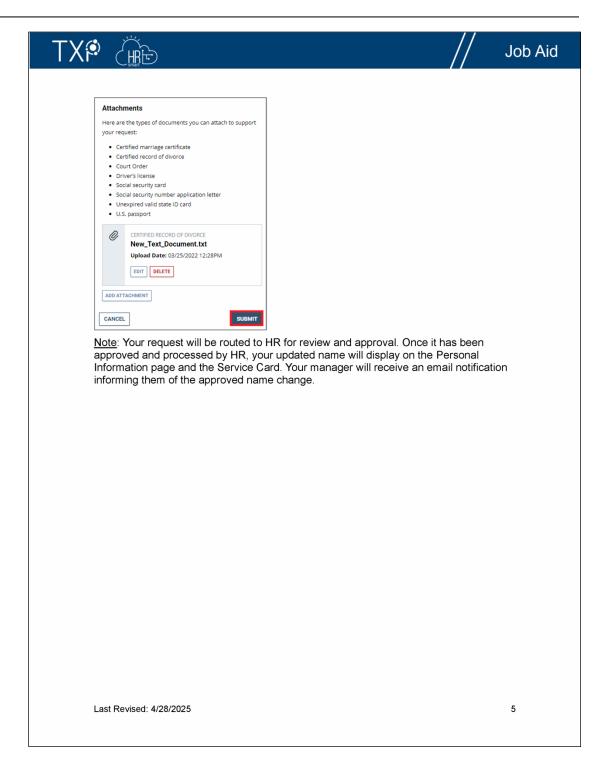
- 3. Select the Effective Date for the name change request.
- 4. Update your name information, as applicable.



5. Select the **Add Attachment** button. Multiple attachments can be added, but at least one supporting document is required.

Last Revised: 4/28/2025



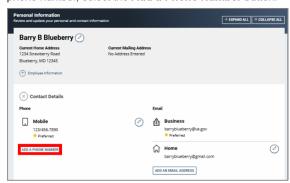




Section 3. Add/Edit Contact Details

This section provides an overview on how to add/update contact details, including phone numbers and email addresses. Contact details are updated automatically upon saving, and do not require any approvals.

- 1. Navigate to the Personal Information page.
- 2. Select the **plus icon** next to the *Contact Details* section if necessary. To add a new phone number, select the **Add a Phone Number** button.



3. Update the **Type** field with the drop-down menu and the phone number in the **Number** field. Check the **Preferred** checkbox, if applicable.

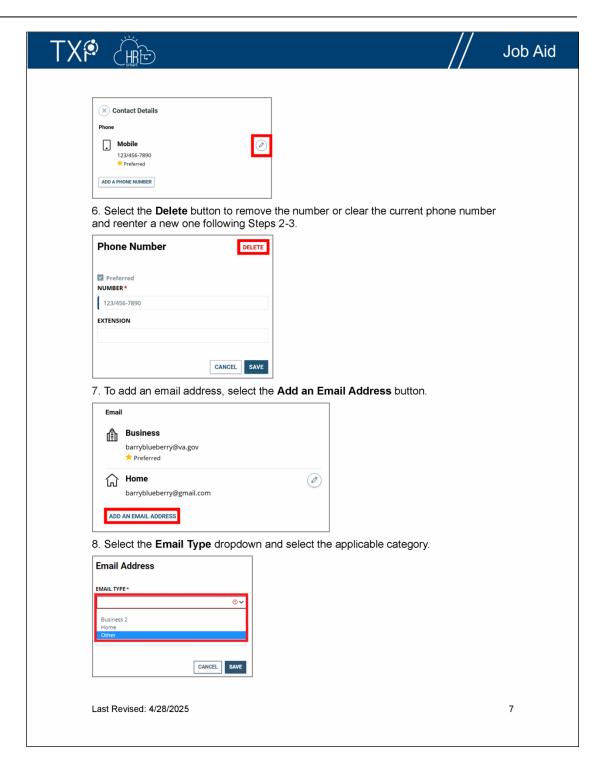
<u>Note</u>: Only work phone numbers should be designated as **Business** when updating the **Type** field. The **Preferred** checkbox is to designate the preferred contact method in case of an urgent message or emergency.

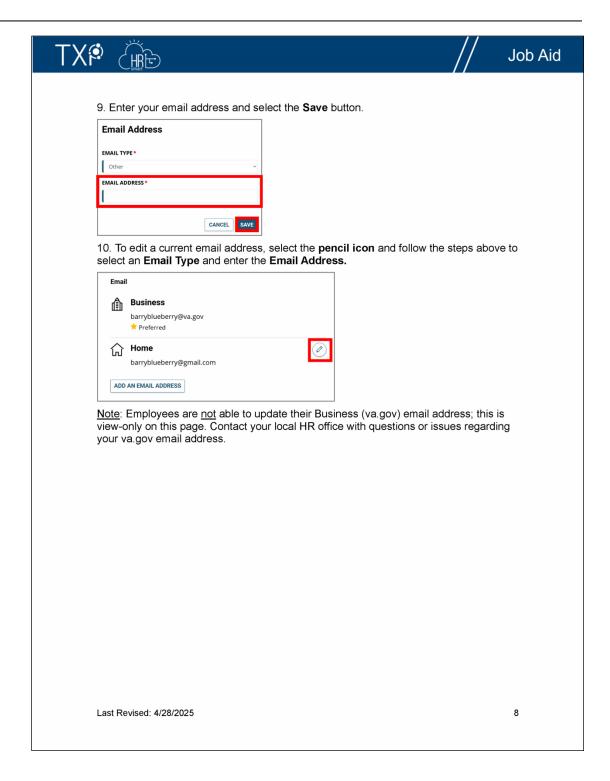
4. Select the Save button.

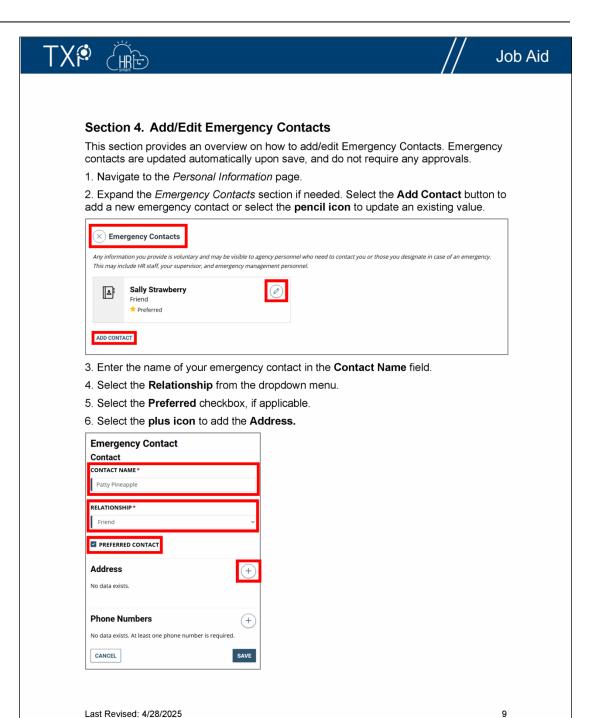


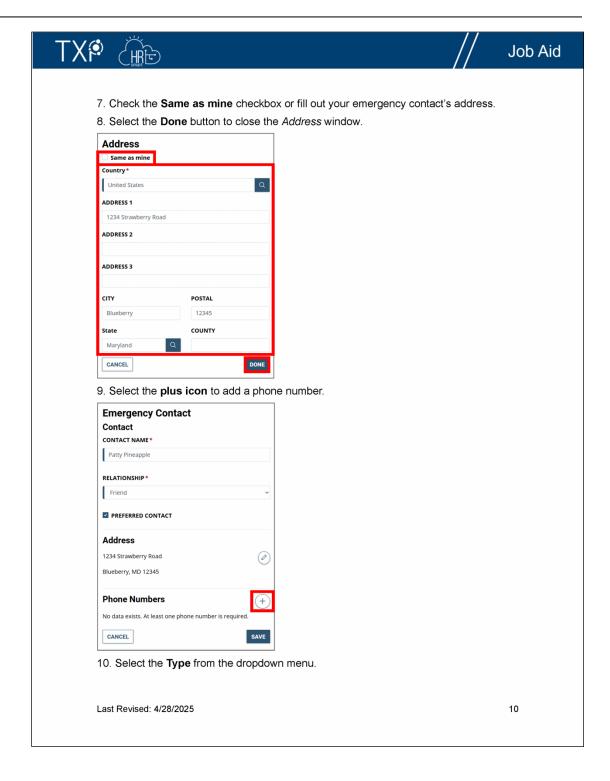
5. To modify an existing phone number, select the **pencil icon** next to the number.

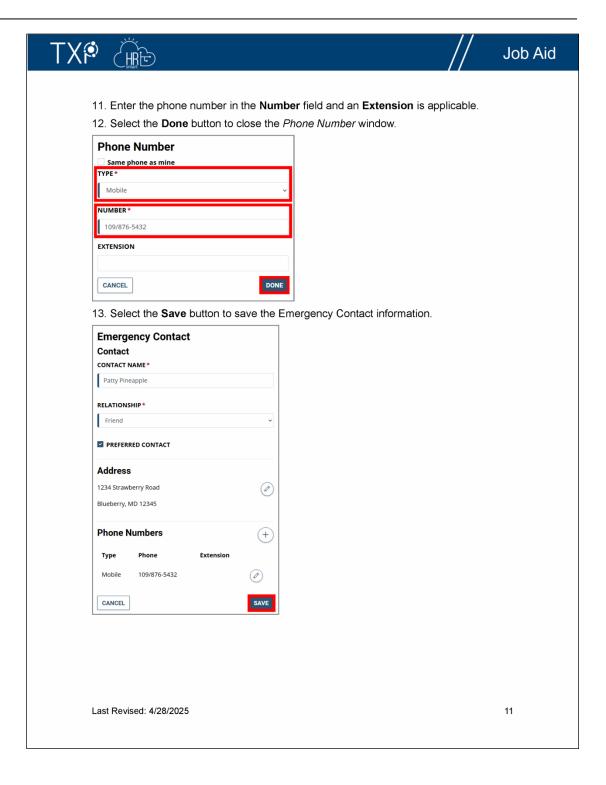
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Section 5. Add/Edit Ethnic Groups

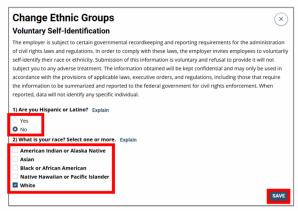
This section provides an overview on how to add ethnicity and race information to your employee profile. Ethnicity information is updated automatically upon save and does not require any approvals.

Your employer is subject to certain governmental recordkeeping and reporting requirements for the administration of civil rights laws and regulations. To comply with these laws, your employer invites employees to voluntarily self-identify their race or ethnicity. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be kept confidential and may only be used in accordance with the provisions of applicable laws, executive orders, and regulations, including those that require the information to be summarized and reported to the federal government for civil rights enforcement. When reported, data will not identify any specific individual.

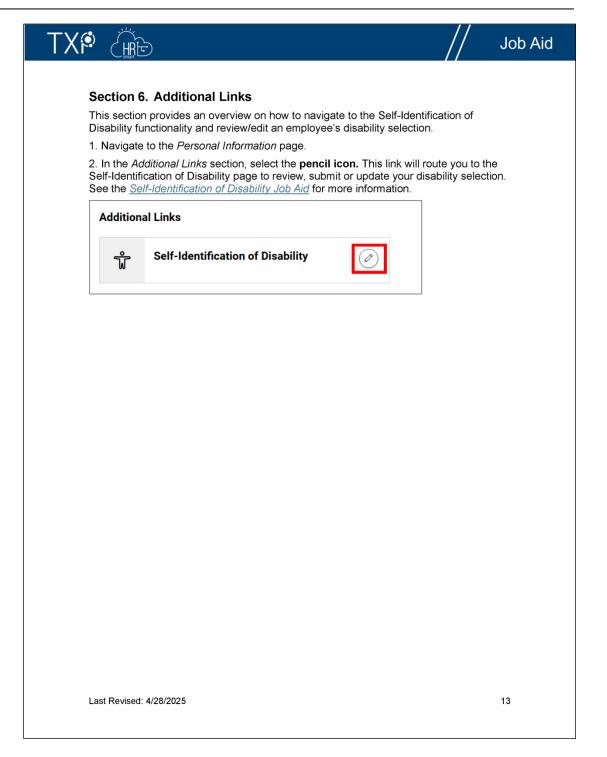
- 1. Navigate to the Personal Information page.
- 2. Expand the Ethnic Groups section if needed.
- 3. Select the pencil icon.



- 4. Select Yes or No for Question #1, as applicable.
- 5. Check race(s) that apply. Multiple races can be selected.
- 6. Select the Save button.



Last Revised: 4/28/2025



Appendix VIII: GAO Contact and Staff Acknowledgments

GAO Contact	Dawn G. Locke, locked@gao.gov
Staff Acknowledgments	In addition to the contact named above, Clifton G. Douglas Jr., McLeod Brown, Kaylin Hewitt, Robert Robinson, and Clarette Yen made key contributions to this report.

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