



DOD Education Activity: Observations on Employment of Individuals with Disabilities

GAO-25-108058

Q&A Report to Congressional Committees

September 4, 2025

Why This Matters

The Department of Defense Education Activity (DODEA) employs teachers and a range of support staff to provide educational services in schools it operates around the world for the dependents of military service members and civilian Department of Defense (DOD) employees. In fiscal year 2024, DODEA employed more than 14,000 people.

Federal law and regulations require covered federal agencies, including DOD, to promote equal employment opportunity to qualified people with disabilities with respect to federal employment. These agencies must develop plans for hiring, placement, and advancement of people with disabilities. The plans must also require the agency to adopt procedures for providing reasonable accommodations, which are a change in the way things are normally done that allows an individual with a disability to apply for a job, do a job, or enjoy equal access to the benefits and privileges of employment, according to the Equal Employment Opportunity Commission (EEOC).

As part of these plans, agencies must also commit to the goal of having a workforce in which no less than 12 percent of employees are people with disabilities, and at least 2 percent are people with targeted disabilities, such as traumatic brain injuries, among others. These goals apply within two subgroups of employees. Federal agencies work toward these goals, sometimes within a Disability Emphasis Program. DODEA implements its responsibilities to support the employment of individuals with disabilities through the joint effort of the agency's Human Resources Division and Equal Employment Opportunity Programs Division, according to agency officials.

The Joint Explanatory Statement accompanying the Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025 includes a provision for us to review DODEA's employment of people with disabilities. (170 Cong. Rec. H6693 (daily ed. Dec. 10, 2024).) This report provides information on whether the agency is meeting its goals and how it supports the employment, retention, and career advancement of people with intellectual, physical, and developmental disabilities.

Key Takeaways

- As of fiscal year 2024, DODEA was not meeting its goals of having a workforce in which at least 12 percent of employees are people with disabilities and 2 percent are people with targeted disabilities.
- DODEA officials told us the agency uses a range of efforts to support employment for people with disabilities across different stages of their career. For instance, DODEA officials attend recruiting events that are targeted to veterans with disabilities. According to agency officials, DODEA also uses special appointment authorities for people with disabilities. In addition, officials told us that providing reasonable accommodations helps the agency retain and advance employees with disabilities.

Is DODEA meeting its goals for employing people with disabilities?

According to DODEA’s most recent data, the agency was not meeting its goals of having a workforce in which at least 12 percent of employees are people with a disability and 2 percent are people with a targeted disability.¹ The agency publishes its progress toward meeting these goals each year in its plan for supporting the employment of people with disabilities.² DODEA data showed that in fiscal year 2024, 6.06 percent of its workforce were people with disabilities (about 900 employees) and 1.07 percent were people with targeted disabilities (almost 160 employees). See table 1 for data broken out by pay groups.

Table 1: Department of Defense Education Activity’s (DODEA) Employment of People with Disabilities by Pay Grade, Fiscal Year 2024		
	Employees in GS-1 to GS-10 pay grades ^a	Employees in GS-11 to GS-15 pay grades ^a
Percentage of DODEA employees with disabilities	5.0	5.8
Percentage of DODEA employees with targeted disabilities ^b	0.9	1.0

Source: GAO analysis of Defense Civilian Personnel Data System data. | GAO-25-108058

Note: The percentages in this table and the text above differ because employees in the Senior Executive Service are included in the percentages reported in the text but not in this table.

^aDODEA’s goals apply to two subgroups of the agency’s employees based on pay grade. The first subgroup includes anyone classified in the federal government’s pay scale as GS-1 through GS-10, or those earning equivalent salaries. The second subgroup includes anyone classified in the federal government’s pay scale as GS-11 through GS-15, or those earning equivalent salaries.

^bTargeted disabilities are a subset of the larger disability category and include disabilities such as intellectual and developmental disabilities, traumatic brain injuries, deafness, blindness, missing extremities, partial or complete paralysis, and seizure disorders. According to EEOC, the federal government has recognized that qualified individuals with targeted disabilities face significant barriers to employment, above and beyond the barriers faced by people with the broader range of disabilities.

Agency officials told us they used information that job applicants and employees voluntarily self-reported to measure employment by disability status.³ Consequently, agency officials said the number of people with disabilities was probably an undercount.⁴ In DODEA’s fiscal year 2023 annual report to EEOC, the agency stated that efforts to encourage employees to review and update the information in their personnel files led to an increased number of staff with self-reported disabilities. For example, according to agency officials, DODEA’s director sent an email in fiscal year 2023 to encourage employees to update their disability status in their personnel files.

What is DODEA doing to increase its employment of people with disabilities?

DODEA officials told us the agency uses a range of efforts to support and increase employment for people with disabilities across different stages of their career (see table 2).

Table 2: Summary of Department of Defense Education Activity’s (DODEA) Reported Actions to Recruit, Hire, Retain, and Advance People with Disabilities			
DODEA Actions	Recruit & hire	Retain	Advance
Recruit prospective employees with disabilities at veteran-focused job fairs and through other targeted recruitment efforts	X	-	-
Use special appointment authority, such as through Schedule A ^a	X	-	-
Implement a reasonable accommodation program ^b	X	X	X

Source: GAO analysis of DODEA agency documentation and interviews with DODEA officials. | GAO-25-108058

^aSpecial appointment authority may be used by agencies to appoint specific groups of eligible individuals to positions in the federal government. Agencies can use Schedule A to appoint people with psychiatric, intellectual, or severe physical disabilities to positions for which they are qualified. The agency can noncompetitively convert the employee to a permanent position after meeting certain conditions such as 2 years of satisfactory service.

^bUnder the Rehabilitation Act of 1973 as amended, federal agencies have a legal obligation to provide reasonable accommodations for their employees and job applicants with disabilities. Agencies are required to establish written reasonable accommodation procedures pursuant to Exec. Order No. 13164, *Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation*, 65 Fed. Reg. 46,565 (July 28, 2000). According to the Equal Employment Opportunity Commission, a reasonable accommodation is a change in the way things are normally done that allows an individual with a disability to apply for a job, do a job, or enjoy equal access to the benefits and privileges of employment. Examples of

How does DODEA recruit people with disabilities as employees?

DODEA targets veterans with disabilities as part of its employment recruiting efforts. These efforts include partnering with veterans' organizations for recruitment events where veterans with disabilities may attend. For example, DODEA recruits at events co-sponsored by Disabled American Veterans and RecruitMilitary.⁵ According to agency officials, DODEA also recruits at career fairs sponsored by organizations such as Hiring Our Heroes and Wounded Warrior Project.⁶ Officials also told us the agency partnered with veterans' organizations such as Wounded Warrior Project and with military installations, for example, to raise awareness of DODEA among disabled veterans.

DODEA reported that the agency also participates in broader DOD recruitment efforts.⁷ For example, DODEA reported participating in the DOD Recruiters' Consortium. This group is comprised of agencies within DOD that meet monthly to share best practices in recruitment, development, and retention of a diverse workforce across DOD.

How does DODEA use special appointment authorities to increase hiring of employees with disabilities?

Special appointment authority may be used by agencies to appoint specific groups of individuals who meet eligibility requirements to positions in the federal government. According to agency officials, DODEA mainly uses two types of special appointment authorities to increase hiring of people with disabilities:

- **Schedule A.** This special appointment authority allows DODEA to appoint people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities to employment positions. Individuals appointed under this authority may be converted to a permanent position after meeting certain conditions such as 2 years of satisfactory service.⁸
- **Veterans who are 30 percent or more disabled.** DODEA may appoint an eligible veteran whom the Department of Veterans Affairs has rated as 30 percent or more disabled to any position for which the veteran is qualified.⁹ Initial appointments are limited to a specific period of time, and DODEA may convert the veteran to a permanent position at any point during the time-limited appointment.

Agency officials described multiple efforts to incorporate Schedule A as part of their recruitment and hiring process. For example, DODEA job postings announce when positions are eligible for Schedule A. Additionally, as of 2024, DODEA formalized the agency's procedures to partner with the Workforce Recruitment Program. This program, which is managed by the Department of Labor and DOD, connects federal and select private-sector employers nationwide with college students, graduate students, and recent graduates with disabilities. Agency officials reported that this agreement with the Workforce Recruitment Program provides Schedule A applicants with meaningful employment opportunities and exposure to careers with DODEA, among others. Officials also reported that DODEA plans to expand marketing of the Workforce Recruitment Program and collaboration with hiring managers across DODEA in the coming fiscal years.

According to DODEA officials, the Civilian Human Resources Agency, DODEA's human resources servicing office, maintains the Program for Individuals with Disabilities Referral Inventory database of qualified people with disabilities who are eligible to be appointed under Schedule A. From this database, staff at the Civilian Human Resources Agency may refer qualified candidates to hiring managers when requested by management or candidates. DODEA also reported

that the Civilian Human Resources Agency routinely reviews vacancy lists to determine if there is a match for referral.

Agency officials reported efforts to recruit and hire veterans who are 30 percent or more disabled. For example, officials reported partnering with the Department of Labor's Veterans' Employment and Training Service to provide access to job listings specifically intended for veterans who have higher disability ratings.¹⁰ According to agency officials, the Veterans' Employment and Training Service supports strategic partnerships and a "comprehensive national network" that distributes job opportunities and connects veterans with employment. To support this effort, DODEA officials told us the agency provided recruitment flyers and conducted a webinar for these partners to share information about DODEA and available job opportunities. Further, DODEA shares information about job requirements with these partners on a weekly basis, according to the agency.

How does DODEA use reasonable accommodations to employ people with disabilities?

According to agency officials, DODEA's reasonable accommodation program may help DODEA with recruitment, retention, and advancement of people with disabilities.

Recruitment: Job postings generally include information about the availability of reasonable accommodations. Including this information with the job postings may help with recruitment of people with disabilities. DODEA also posts information about its reasonable accommodations program on the agency website.

Retention: According to an agency official, providing reasonable accommodations is DODEA's primary method of retaining employees with disabilities. The official told us that employees may develop disabilities as they age and that the reasonable accommodations program allows employees to work at the agency for additional years. Further, if there is no reasonable accommodation that can allow an employee to perform their essential duties, agency policy includes a process to explore shifting the employee to a different job that can accommodate their disability, a process called reassignment. For example, an agency official said that the agency has moved employees who had been working overseas to domestic positions so the employees could access needed healthcare or other accommodations. According to agency policy, reassignment is an accommodation of last resort, and a DODEA official told us the agency views it as a safety net for employees with disabilities. If DODEA is unable to find a job that will accommodate an employee's disability, the employee might no longer be able to work at the agency, according to agency policy.¹¹

Advancement: Agency officials told us reasonable accommodations can also help employees advance in their careers since the accommodations an employee has in place may allow them to shift jobs or take on more responsibility as needed. However, agency officials told us the agency does not have specific career development programs designed for their employees with disabilities. Instead, employees can work with division chiefs to create individual career development plans. For employees with disabilities, these plans can include consideration of their reasonable accommodations.

Agency Comments

We provided the Department of Defense with a draft of this report for review and comment. The Department of Defense provided a technical comment, which we incorporated.

How GAO Did This Study

We reviewed relevant federal laws and regulations, and a relevant directive. To determine if DODEA was meeting its disability employment goals, we obtained fiscal year 2024 data on the number and percentage of DODEA employees with disabilities, including by GS-level clusters, from the Defense Civilian Personnel Data System. We also interviewed agency officials from DODEA's Human Resources Division and Equal Employment Opportunity Programs Division. We were not able to independently verify the agency's reported data on the number of employees with disabilities because it is self-disclosed. However, we determined the data were sufficiently reliable for us to assess whether DODEA was meeting its employment goals for people with disabilities.

To describe how DODEA supports the employment of people with disabilities—including during recruitment, hiring, retention, and career advancement—we reviewed available agency policies, procedures, and plans, and we interviewed agency officials. In particular, we reviewed the agency's Federal Agency Annual Equal Employment Opportunity Program Status Reports from fiscal years 2020–2023, the most recent available at the time of our review, according to a DODEA official. We also reviewed the agency's Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities from fiscal years 2022 and 2023.

We conducted this performance audit from January 2025 to September 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.

List of Addressees

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The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Mike Rogers
Chairman
The Honorable Adam Smith
Ranking Member
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We are sending copies of this report to appropriate Congressional committees and the Secretary of Defense. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>

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Endnotes

¹DODEA's goals apply to two subgroups of the agency's workforce: those classified in the federal government's pay scale as GS-1 through GS-10, including those earning equivalent salaries, and those classified as GS-11 and above, including those earning equivalent salaries. For EEOC's requirements regarding goals for federal agency employment of individuals with disabilities, including those two subgroups, see 29 C.F.R. § 1614.203(d)(7). More broadly, the general requirement for federal agencies to promote federal employment of individuals with disabilities is set forth in Section 501 of the Rehabilitation Act of 1973. 29 U.S.C. § 791.

²Each year, DODEA submits its "Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities" to EEOC. Among other things, the plan includes the agency's progress toward meeting its disability employment goals, along with recent and planned actions to support the recruitment and hiring of employees with disabilities.

³According to agency officials, the agency provides new employees a form to report any disabilities. Employees have the option to update their disability status any time they update their personnel file. Applicants also have the option to report a disability. For the purpose of identifying how many employees have disabilities, agencies may classify employees as individuals with disabilities based on three sources of information: (1) employees self-identifying their disability status on the Office of Personnel Management's Standard Form 256 or certain other forms, (2) records relating to an individual's appointment under a hiring authority that takes disability into account, and (3) records relating to an individual's requests for reasonable accommodation. 29 C.F.R. § 1614.203(d)(6). According to DODEA officials, the agency relies on self-reported data on employees' disability status when calculating the percentage of its workforce made up of people with disabilities and targeted disabilities.

⁴In our past work, we have reported that federal agency officials and advocates for people with disabilities believe there is an undercount of employees with disabilities. Officials and advocates said this was because some individuals might not disclose their disability status out of concern they would be discriminated against or precluded from advancement. In addition, employees may develop a disability during federal employment and may not know how to or why they should update their status. See GAO, *Disability Employment: Further Action Needed to Oversee Efforts to Meet Federal Government Hiring Goals*, GAO-12-568 (Washington, D.C.: May 25, 2012).

⁵Disabled American Veterans is a congressionally chartered veteran service organization that advocates for veterans and assists veterans with obtaining benefits. RecruitMilitary provides veterans with employment resources such as employment assistance, job search resources, and access to training and certifications.

⁶Hiring Our Heroes works to connect veterans with employment opportunities at public, private, and non-profit organizations. Wounded Warrior Project offers programs and services to veterans such as career counseling and conducts advocacy on behalf of veterans.

⁷DODEA annually provides two reports to the Equal Employment Opportunity Commission: the Equal Employment Opportunity Program Status Report and the Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities. Additionally, DODEA provides a Disabled Veterans Affirmative Action Program Plan (Form 5110) to the Office of Personnel Management that covers a year or more. For this report, any references to agency reports is to one of these sources.

⁸An individual may receive a permanent, time-limited, or temporary appointment under this authority. A temporary appointment is appropriate when an agency determines it is necessary to observe the applicant on the job to determine whether the applicant is able or ready to perform the

duties of the position. An agency may convert an individual under a temporary appointment to a permanent position if the agency determines the individual is able to perform the duties of the position. 5 C.F.R. § 213.3102(u).

⁹The Department of Veterans Affairs assigns a disability rating based on the severity of the veteran's service-connected disability. These ratings, which are assigned in increments of 10 percent, generally represent the average impairment of earning capacity from such injuries in civil occupations.

¹⁰The Department of Labor's Veterans' Employment and Training Service helps prepare veterans, among others, with careers by providing them with employment resources, protecting their employment rights, and promoting employment opportunities.

¹¹Agency officials estimated that approximately 10 employees had left the agency since 2021 due to medical separations.

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