**G P O**

**U.S. GOVERNMENT PRINTING OFFICE**
**KEEPING AMERICA INFORMED**

**AUDIT REPORT 08-10**

**DIVERSITY MANAGEMENT PROGRAMS AT THE GOVERNMENT PRINTING OFFICE**

September 11, 2008

**OFFICE OF INSPECTOR GENERAL**

**U.S. GOVERNMENT PRINTING OFFICE**
KEEPING AMERICA INFORMED
WASHINGTON, DC 20401

# Memorandum

OFFICE OF THE INSPECTOR GENERAL

DATE: September 11, 2008

REPLY TO
ATTN OF: Assistant Inspector General for Audits and Inspections

SUBJECT: Final Report on Audit of Diversity Management Programs at the GPO
Report Number 08-10

TO: Public Printer
Director, Office of Equal Employment Opportunity
Chief Human Capital Officer


Enclosed please find the subject final report. Please refer to the Executive Summary for the overall audit results. Our evaluation of your response has been incorporated into the body of the report and is included in its entirety as Appendix J. While management concurred with each of the report's recommendations, specific planned actions for each of the recommendations were not provided. We are requesting that you provide additional details related to specific actions the Agency plans to take to implement the recommendations. As a result, pending receipt of details related to implementation, each of the recommendations is considered unresolved. The final report distribution is in Appendix L.

We appreciate the courtesies extended to the audit staff. If you have any questions concerning the report, please contact Mr. Joseph Verch, Supervisory Auditor at (202) 512-0065, or me at (202) 512-2009.


*(Original signed by)*

Kevin J. Carson
Assistant Inspector General for Audits and Inspections



cc:
Chief of Staff
Chief Management Officer
General Counsel

## *Contents*

# Office of Inspector General

Report Number 08-10                                                    September 11, 2008

## Diversity Management Programs
## at the Government Printing Office

## Executive Summary

**Background.**  The Government Printing Office (GPO) Office of Inspector General (OIG) has completed an audit of diversity management programs at the GPO.  The audit was conducted in response to a request from the Chairman of the Subcommittee on Federal Workforce, Postal Service, and the District of Columbia, of the House of Representatives' Committee on Oversight and Government Reform.  The Subcommittee requested that the OIGs of each legislative branch agency assess the programs the diversity offices have in place to address diversity concerns.[1]  The participating OIGs plan to publish the final results in a consolidated report by September 2008.

**Objectives.**  The overall objective of the audit was to review diversity within GPO, specifically to:

- Identify and assess the diversity program at GPO to determine if it is yielding the desired results—that of creating a more diverse population of women and minorities in top leadership positions, specifically the Senior Level Service (SLS);[2]

- Evaluate the accuracy and completeness of the complaints and discrimination data reported to Congress; and

- Assess the degree to which diversity offices or functions are independent of the General Counsel and the Public Printer.

See Appendix A for details on the audit objectives, scope, and methodology.

**Results of Audit.**  While not mandated to comply with the guidelines and directives of the Equal Employment Opportunity Commission (EEOC) concerning model affirmative action programs, prior to this audit commencing, senior officials at GPO, including the Directors of the Office of Equal Employment Opportunity (EEO) and Human Capital began adopting some elements of both EEOC Management Directive 715 (MD-715) and

---

[1] Other legislative branch agencies include the Library of Congress, Government Accountability Office, Architect of the Capitol, and the Capitol Police.
[2] Senior Level Service is the GPO equivalent to the Senior Executive Service (SES).

the leading diversity management practices identified by the Government Accountability Office (GAO). GPO has also made progress in developing its pool of Grade 15s (PG-15s) to ensure a qualified minority pool for the Agency's SLS.[3] However, improvements can be made towards enhancing the diversity of the Agency's corps of SLS employees.

The audit also showed that GPO complaints and discrimination data reported to the EEOC during fiscal year (FY) 2007 and eventually reported to Congress were accurate and complete. (See Appendix G). Further, although diversity management programs are incorporated in the Affirmative Employment Program (AEP) Division of GPO's EEO Office, the Director of EEO is independent of the General Counsel, and to a certain extent independent of the Public Printer in EEO matters. (See Appendix H).

Opportunities do exist for GPO to provide a more diverse population of qualified women and minorities in top leadership positions by incorporating the remaining essential elements of MD-715 as well as implementing the nine leading practices for diversity management identified by the GAO. Such modifications should help the agency manage the workforce and create an environment that helps diminish barriers for protected groups. In addition, changes brought about through diversity management should help attract and retain capable employees. With an expectation that a high percentage of the Government workforce will retire in the next decade, GPO should continue developing a comprehensive diversity program to meet those employment challenges.

The audit specifically identified that although GPO is not required to comply with MD-715 or GAO's leading diversity management practices:

- GPO has generally adopted three elements for creating and maintaining a model EEO program identified by MD-715, referred to as (1) demonstrated commitment from leadership, (2) efficiency, and (3) responsiveness and legal compliance. (Finding A); and

- Agency officials have partially adopted one of the GAO's nine leading diversity management practices (top leadership commitment). (Finding B).

**Recommendations.** We made two recommendations to GPO management, which, if implemented, should not only improve the GPO diversity program by providing a more diverse population of qualified women and minorities in top leadership, but also contribute to GPO's ability to meet its future employment challenges.

**Management's Response.** GPO Management concurred with each of the report's two recommendations and stated that implementation would require the Public Printer's review and approval (see Appendix J).

---

[3] At GPO, a Printing Office Grade (PG) 15 is the senior most grade and is generally equivalent to the General Schedule (GS) Grade 15 classified by the Office of Personnel Management. Positions at GPO above Grade PG-15 are in the Senior Level Service (SLS).

**Evaluation of Management's Response.**  While GPO management concurred with each of the recommendations, they did not provide details regarding what actions the Agency plans to take to implement the recommendations.  As a result, pending receipt of details related to implementation, the recommendations are considered unresolved.

# Introduction

In November 2007, the Chairman of the Federal Workforce, Postal Service, and the District of Columbia Subcommittee of the House of Representatives' Oversight and Government Reform Committee issued a report entitled "Senior Executive Service: Women and Minorities are Underrepresented in Most Legislative Branch Agencies."[4] The report discusses racial and gender diversity of the Senior Executive Service corps in the six legislative branch agencies during FY 2007.  The report stated that:

- Minorities represent 16.8 percent and women represent 35.8 percent of Senior Executive Service corps members in the six legislative branch agencies.

- In FY 2007, Senior Executive Service corps members at each agency were less diverse in terms of minorities than the agency's workforce as a whole and in four of the six agencies less diverse in terms of women.

- The representation of minorities in the legislative branch Senior Executive Service corps is stagnant, with representation of women improving only slightly between FY 2002 and FY 2007.

- General Schedule-15 successor pools[5] at some agencies were less diverse than the Senior Executive Service corps.

- In some agencies, the average total salary for minorities and women in FY 2007 was less than for nonminority and male counterparts.

To ensure equal opportunity and diversity, the EEO Office at the GPO is responsible for complying with civil rights statutes and regulations governing Federal employment.[6]  As of January 28, 2008, GPO had a total of 2,263 white and blue collar employees (see Appendix C).  White collar employees generally consist of administrative, technical, clerical, professional and management personnel while blue collar employees consist generally of those employees who work in production departments.  Of the 2,263 employees at GPO, 956 were women (42.3 percent) and 1,359 were minorities (60.1 percent).  On staff at GPO are a total of 26 SLS employees consisting of 3 women (11.5 percent) and 3 minorities (11.5 percent).  For white collar workers, the ratio between women and minorities and SLS employees was similar—645 women (42.3 percent) and

---

[4] Report may be found at http://federalworkforce.oversight.house.gov/story.asp?ID=1617

[5] The November 2007 report of the Chairman of the Federal Workforce, Postal Service, and the District of Columbia Subcommittee of the House of Representatives' Oversight and Government Reform Committee defines successor pools as an agency's GS-15 and equivalent ranks of which the diversity of such pools can provide an indicator of how diverse the Senior Executive Service (or equivalent rank) could become in the future.

[6] Title VII of Civil Rights Act of 1964, Age Discrimination in Employment Act of 1967, and Title I of the Americans with Disabilities Act of 1990.

611 minorities (52.5 percent).  Tables 1 and 2 below provide more detail between the makeup of GPO's total workforce and between the total white collar workforce and the SLS corps.

**Table. 1.  FY 2008 Total Workforce (as of January 28, 2008)**

| Employees | Workforce | |
|---|---|---|
| **Males** | **Number** | **Percent** |
| White | 610 | 27.0 |
| African American | 639 | 28.2 |
| Asian American/Pacific Islander | 26 | 1.1 |
| Hispanic American | 26 | 1.1 |
| Native American | 6 | 0.3 |
| **Total Males** | **1,307** | **57.7** |
| | | |
| **Females** | | |
| White | 294 | 13.0 |
| African American | 622 | 27.5 |
| Asian American/Pacific Islander | 24 | 1.1 |
| Hispanic American | 12 | 0.5 |
| Native American | 4 | 0.2 |
| **Total Females** | **956** | **42.3** |
| **Overall Totals** | **2,263** | **100.0** |

**Table 2.  FY 2008 White Collar Workforce Contrasted with SLS Employees (as of January 28, 2008)**

| Employees | Workforce | | SLS | |
|---|---|---|---|---|
| **Males** | **Number** | **Percent** | **Number** | **Percent** |
| White | 315 | 27.1 | 22 | 84.6 |
| African American | 165 | 14.2 | 0 | 0.0 |
| Asian American/Pacific Islander | 19 | 1.6 | 0 | 0.0 |
| Hispanic American | 17 | 1.4 | 1 | 3.9 |
| Native American | 2 | 0.2 | 0 | 0.0 |
| **Total Males** | **518** | **44.5** | **23** | **88.5** |
| | | | | |
| **Females** | | | | |
| White | 237 | 20.4 | 1 | 3.8 |
| African American | 372 | 32.0 | 2 | 7.7 |
| Asian American/Pacific Islander | 20 | 1.7 | 0 | 0.0 |
| Hispanic American | 12 | 1.0 | 0 | 0.0 |
| Native American | 4 | 0.4 | 0 | 0.0 |
| **Total Females** | **645** | **55.5** | **3** | **11.5** |
| **Overall Totals** | **1,163** | **100.0** | **26** | **100.0** |

The EEO Director is responsible for ensuring that equal opportunities exist for employees and applicants without regard to race, sex, color, religion, national origin, sexual orientation, age, and physical and mental disability. The EEO Office consists of two divisions: (1) the Affirmative Employment Program (AEP) Division; and (2) the Counseling and Complaints Processing Division (CCPD). For FY 2007, the GPO EEO Office had a budget of $888,500 and a staff of seven employees.[7]

## AEP Division

The AEP Manager assures that equal opportunity principles are an integral part of every aspect of personnel policy and practice in the recruitment, employment, development, advancement, and treatment of GPO staff and applicants for employment. In addition, the AEP Manager also manages special emphasis programs that implement Presidential Executive Orders and Federal personnel programs for eliminating demographic group imbalances in targeted occupations, and achieving diversity in the workforce.

The AEP manager oversees three special emphasis programs assigned to GPO managers who work the programs as a collateral duty. Collateral duty managers can spend up to 25 percent of their time managing the following special emphasis programs.

- *Disability Program*

The Disability Program at GPO consists of a program manager and ten employees who voluntarily serve on the Disability Program Committee. The mission of the committee is to raise awareness of disability policies and programs through information dissemination and education programs and help elevate disability concerns to the EEO Office. The program committee works with the EEO Office to identify employment barriers to individuals with disabilities, review Agency policies addressing employment issues, and recommend changes.

- *Federal Women's Program*

The Federal Women's Program (FWP) at GPO has the involvement of the EEO Director, the AEP Manager, and an FWP Manager, who performs the job as a collateral duty. The FWP committee also has 34 members. The FWP committee's mission is to continually identify, promote, and enhance employment and training opportunities for women. The committee also helps keep women at GPO apprised of employment issues; assists women in training, career development, and advancement; provides networking channels with other FWP organizations on issues related to eliminating barriers to equal access and opportunity; and promotes professionalism that furthers the progress of women.

---

[7] GPO's budget for FY 2007 was $848.225 million.

- *Hispanic Employment Program*

The GPO Hispanic Employment Program's (HEP) mission is to eliminate discriminatory practices, assist in eliminating areas of under-representation or underutilization, evaluate practices for disparate impact or treatment, and recommend changes to eliminate barriers to Hispanic employment. The HEP manager serves in the position as a collateral duty and also serves as the Secretary to the National Council of HEP Managers, a body consisting of members from 40 different federal agencies appointed as their agency's designee responsible for building relationships between federal agencies and the Hispanic community. The HEP manager also is responsible for e-mailing GPO job vacancies to not only 67 Hispanic organizations, but also to more than 800 individuals who belong to the Washington DC-Hispanic Employment Network.

- *Other Programs*

The AEP Manager also manages the pilot Employee Mentoring Program and the Passport-to-Work Summer Youth Program, and also co-manages the Coming Home to Work Program. The GPO Employee Mentoring Program (GEM) began as a pilot program in April 2008 and is designed to enhance employee retention, job satisfaction, and cross-organizational communication through employees receiving guidance, counseling, and coaching from designated GPO mentors. In another program, the Department of Veterans Affairs works with GPO and sponsors the Coming Home to Work Program that helps provide suitable employment opportunities for eligible members of the armed services. The Passport-to-Work Summer Youth Program offers District of Columbia youths, ages 14 to 21, a 10-week temporary summer job at GPO— funded by the District of Columbia Youth Employment Office. GPO has participated in this program for several years, and placed an average of 52 students from this program during the last 6 years, with 48 placed in 2008.

*CCPD Division*

The Assistant Director/Chief of CCPD manages the EEO complaint process for GPO employees and applicants for employment involving issues of discrimination on the basis of race, sex, color, religion, national origin, sexual orientation, age, disability, and reprisal for prior participation in the EEO complaints process. Along with three EEO specialists, the Chief of CCPD issues policy and guidelines related to discrimination complaint procedures, monitors complaints of discrimination to detect indications of discriminatory patterns and practices, and prepares final Agency decisions on complaints. The CCPD also collects, maintains, and analyzes data on the discrimination complaint process and serves as the official source of information for the status of complaints at GPO. CCPD also oversees recruiting, selecting, and maintaining a cadre of trained EEO specialists.

***Leadership, Development, and Recruitment Program***

The Agency has also recently started a new leadership program for employees.  The Leadership, Development, and Recruitment (LDR) program is a 2-year program, and is staffed with employees recruited from both within and outside the Agency.  The LDR program allows employees to work in a number of business units—receiving well-rounded, hands-on experience necessary to prepare them as future GPO leaders.

# Findings and Recommendations

## Finding A.  Incorporating the Essential Elements of EEOC Management Directive-715

Although not mandated, senior officials at GPO have begun to generally follow several of the key elements of the EEOC's MD-715 for creating and maintaining a model EEO program into the structure of the Agency.  For example, of the six essential elements outlined in MD-715, GPO has generally incorporated three: (1) demonstrated commitment from agency leadership; (2) efficiency; and (3) responsiveness and legal compliance.  The three additional elements that would help establish a model EEO program include: (1) integration of EEO into the agency's strategic mission; (2) management and program accountability; and (3) proactive prevention of unlawful discrimination.

### *Basic Tenets of Management Directive 715*

Effective October 1, 2003, the EEOC issued MD-715.  The directive provides the basic elements necessary for creating and maintaining a model EEO program in the Federal government.  The directive specifically applies to agencies in the executive branch and Military Departments (except uniformed members), the U.S. Postal Service, the Postal Rate Commission, the Tennessee Valley Authority, the Smithsonian Institution, and those units of the judicial branch of the Federal Government having positions in the competitive service.

When establishing a model EEO program, MD-715 provides that an agency should incorporate into its design a structure for effective management, accountability, and self-analysis that will ensure program success.  MD-715 not only contains reporting requirements, but states that six essential elements make up a model EEO program including:

- Demonstrated commitment from agency leadership.
- Integration of EEO into the agency's strategic mission.
- Management and program accountability.
- Proactive prevention of unlawful discrimination.
- Efficiency.
- Responsiveness and legal compliance.

As part of the audit, the OIG assessed the current status of GPO's voluntary efforts to integrate the elements of MD-715 into the structure of the Agency.  The results of our assessment are discussed in the following section and are summarized in Appendix B.

*Essential Element One – Demonstrated Commitment From Agency Leadership*

Element One recommends that the demonstrated commitment from agency leadership start with an effective EEO program policy statement. The criteria states that at the beginning of a tenure and each year thereafter, the head of an agency should issue a signed written policy statement announcing the agency's position against discrimination based on the areas that Federal law covers. GPO has voluntarily adopted this element as the Public Printer issued a policy statement to all GPO employees on April 8, 2008, emphasizing his personal commitment to equal opportunity and diversity. (See Appendix E for the complete text of that statement).[8]

The element further recommends that the head of an agency and other senior management officials demonstrate a commitment to equal employment by incorporating the principles of EEO into an agency's organizational structure and disseminating a policy demonstrating this commitment annually. Publishing such a statement sends a clear message to others in the organization about the seriousness and business relevance of diversity management. Accordingly, we recommend that the Public Printer continue to issue a policy statement addressing his commitment to EEO and diversity on a yearly basis as suggested by MD-715.

*Essential Element Two – Integration of EEO into the Agency's Strategic Mission*

Element Two provides that the concepts of EEO should be a part of the strategic mission and that an agency's EEO program should be organized and structured in a way that maintains a workplace free from discrimination through its policies, procedures, or practices. Although GPO's current strategic plan entitled *A Strategic Vision for the 21st Century* (December 1, 2004) does not include an EEO message, GPO has followed several of the other concepts of Element Two in that GPO has:

- Maintained a reporting structure that allows the EEO Director the appropriate authority and resources to effectively carry out a successful EEO program.

- Committed sufficient human resources and budget allocations to the EEO program for a successful operation.

- Empowered the EEO Director to have regular and effective ways of informing the Public Printer and senior management officials of the status of EEO programs and being involved in, and consulting on, management and personnel actions.

While management has recognized several aspects of Element Two, management should integrate EEO into the Agency's strategic plan. Accordingly, we recommend that as the new Public Printer formulates his strategic plan, he include EEO and diversity as an integral part of GPO's strategic mission.

---

[8] The current Public Printer was appointed by the President on November 6, 2007. While the current Public Printer issued a policy statement to employees at the beginning of his tenure as Public Printer, over three years had elapsed since the previous Public Printer issued his statement on February 1, 2005.

*Essential Element Three – Management and Program Accountability*

To ensure management and program accountability, criteria in Element Three discusses overall accountability and EEO program management. The criteria recommends that the head of an agency should hold managers, supervisors, and EEO officials responsible for effective implementation of an agency's EEO program and plan.

The thrust of management and program accountability is that EEO officials advise and provide assistance to managers about the status of EEO programs within each manager's area of responsibility. In addition, the Directors of EEO and Human Capital should meet regularly and assess whether personnel programs, policies, and procedures conform to EEOC management directives. MD-715 also instructs that the agency explore whether disciplinary actions should be taken when findings of discrimination are made.

In October 2007, EEO officials at GPO began meeting with business unit managers semiannually to discuss EEO issues and concerns within business units, provide information on EEO programs and analysis of workforce data, and obtain input that could assist in developing strategies for improving EEO programs at GPO.

While GPO practices address portions of Element Three's criteria, we recommend that EEO continue to work with business unit managers to develop EEO plans and that EEO and Human Capital officials work together and with business unit managers to identify systemic barriers in hiring, promotions, training, and awards.

*Essential Element Four – Proactive Prevention of Unlawful Discrimination*

Element Four states that an agency has an obligation to prevent discrimination on the basis of race, color, national origin, religion, sex, age, reprisal and disability, and to eliminate barriers that impede free and open competition in the workplace.[9] Putting such an obligation into place begins with informing employees about an effective anti-discrimination policy that explains the protections afforded by the civil rights laws, the rights afforded in such situations, and the process for redress. Further, the head of an agency must make efforts early to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.

The criteria recommends that agencies conduct annual self-assessments to monitor progress, identify areas where barriers may operate to exclude certain groups, and develop strategic plans to eliminate identified barriers. In an attempt to benchmark GPO's status, we requested that the EEO officials conduct a self-assessment to help identify gaps and potential areas for development. The results of this assessment are summarized in Table 3.

---

[9] The Statement of the Public Printer, dated April 8, 2008, is more comprehensive than that recommended by MD-715: "Employment actions must be based upon merit principles and made without regard to an individual's race, color, religion, national origin, sex, age, mental/physical disability or sexual orientation."

**Table 3. Types of Information Needed for Accurate Self-Assessment as Prescribed by MD-715**

| | Workforce Profiles | Provided | Not Provided |
|---|---|---|---|
| 1. | Total workforce distribution by race, national origin, and sex for both the permanent and temporary workforce | X[10] | |
| 2. | Permanent and temporary workforce participation rates for each grade level by race, national origin, and sex | X[11] | |
| 3. | Permanent and temporary workforce participation rates for each of the agency's major occupational categories (divided by grade level) by race, national origin, and sex | | X[12] |
| 4. | Participation rates in supervisory and management positions by race, national origin, and sex | | X[13] |
| 5. | Race, national origin, and sex of applicants for both permanent and temporary employment | | X |
| 6. | Rates of selections for promotions, training opportunities and performance incentives, by race, national origin, and sex | X[14] | |
| 7. | Rates of both voluntary and involuntary separations from employment by race, national origin, and sex | X[15] | |

Since GPO is not required to follow MD-715, the AEP Manager has not yet implemented annual self-assessments. However, we recommend annual self-assessments so that the AEP Manager can more effectively monitor progress, identify areas where barriers exclude certain groups, and develop strategic plans to help eliminate barriers. Additionally, in the absence of a formal requirement for self-assessments, the data necessary to complete these assessments is not readily available from Information Technology and Systems (IT&S) in the desired format. Under the circumstances, the AEP Manager must now manually reformat data from Human Capital and arrange it in a format suitable for agency needs or congressional hearings. A request for software that would assist the efforts of the AEP Manager, is pending. Since more complete and accurate data would help the AEP Manager monitor progress and identify areas where barriers are possibly excluding certain groups, we recommend further action in order to meet the requirements of Element Four.

---

[10] Provided only permanent workforce for FY 2006 and 2007; did not provide temporary workforce.

[11] Provided only permanent workforce for FY 2006 and 2007; did not provide temporary workforce.

[12] Provided occupation by organization for FY 2007 and organization profile by occupation series for full-time, part-time, and other for FY 2006 and 2007.

[13] Provided organizational profile by supervisor and manager for full-time, part-time, and other for FY 2006 and 2007.

[14] Provided promotions for FY 2006 and 2007; Human Capital was not asked by EEO to provide profiles for training opportunities and performance incentives.

[15] Provided separations for FY 2006 and 2007; report did not distinguish between voluntary and involuntary for both years.

*Essential Element Five – Efficiency*

Element Five requires that the agency head ensure that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process. Critical to this element are adequate and accurate information collection systems. Such systems fully integrated into an agency's infrastructure help it conduct periodic reviews—thus allowing the agency to stay on top of those items affecting the myriad of EEO areas.

Element Five identifies six areas for the agency to comply with EEOC's instructions including: (1) sufficient staffing, funding, and authority to achieve the elimination of identified barriers; (2) an effective complaint tracking and monitoring system in place to increase the effectiveness of the agency's EEO programs; (3) sufficient staffing, funding and authority to comply with the time frames in accordance with EEOC regulations for processing EEO complaints of employment discrimination; (4) an efficient and fair dispute resolution process and effective systems for evaluating the impact and effectiveness of the agency's EEO complaint processing program; (5) effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs; and (6) ensuring that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of the agency or other offices with conflicting or competing interests.

GPO is achieving many of the objectives of Essential Element Five. However, further progress can be made to develop methods to identify and eliminate barriers and implement specific strategies for evaluating the impact and effectiveness of EEO programs.

Additionally, EEO officials have experienced difficulty consolidating the information obtained from Human Capital due to the variances in data formats available for tracking the information required to achieve the elimination of identified barriers. Accordingly, we recommend that GPO management identify a solution to ensure the ability to obtain accurate data for use in identifying and eliminating barriers and to help evaluate the impact and effectiveness of its EEO programs.

Illustrative of this point is the absence of recruitment effort tracking and analysis. For example, between September 2007 and February 2008, the EEO Director visited universities in California, New Mexico, and Texas to recruit Hispanic Americans for GPO's 2008 Leadership Program and other job vacancies. In addition, Human Capital officials made similar visits to universities to recruit for the Leadership Program. Despite these efforts, Human Capital did not track these recruitment efforts or have a written plan for attracting a supply of qualified, diverse applicants for GPO employment. Since the EEO Director and Human Capital officials are not the hiring officials for GPO's individual business units, consideration should be given to having business unit managers participate in future recruiting efforts.

Although GPO was generally following most of the six subcategories, we recommend that management emphasize these additional areas, to help ensure that effective systems are in place for evaluating the impact and effectiveness of the EEO programs.

*Essential Element Six – Responsiveness and Legal Compliance*

Element Six contains a requirement that each year an agency certify that it is complying with EEO laws and EEOC regulations, policy guidance, and other written instructions. Element Six also identifies that agency personnel should be accountable for the timely compliance with EEOC orders. While the EEO staff are formally trained and responsible for compliance with EEO laws and EEOC regulations and orders, these requirements are not fully incorporated into the performance standards of GPO employees. The EEO Office has a system called EEO Network (EEONET) which ensures that any EEO cases over 30-days old are identified. This system is backed up by a manual calendar system which ensures that GPO officials comply in a timely manner with any orders or directives issued by EEOC Administrative Judges.

Although generally following the requirements of Element Six, management can send a positive and clear message to all GPO employees about maintaining a workplace free of discrimination and harassment as well as a commitment to EEO and diversity by requiring compliance with EEO laws and EEOC regulations in the performance standards of all managers and SLS personnel.

While GPO is voluntarily complying with several of the essential elements identified by the EEOC, the opportunity exists through fully incorporating the six elements to create and maintain a model EEO program at GPO. Creation of a model program will help further ensure that the agency is not only free from employment discrimination, but also has a diverse workforce.

## Recommendation

1. The Public Printer should incorporate the six essential elements of Equal Employment Opportunity Commission Management Directive 715 by taking the following actions:

   a. Continue to issue and disseminate to GPO employees an annual signed written policy statement expressing Agency commitment to equal employment opportunity as well as maintaining a workplace free of discriminatory harassment and practices.

   b. Integrate equal employment opportunity policy and practices into future agency strategic plans.

   c. Require, with assistance from EEO officials, that business unit managers develop an EEO plan for their individual units and that EEO and Human Capital officials meet regularly to identify any systemic barriers in hiring, promotions, training, and awards.

d.  Conduct annual self-assessments that monitor progress, identify areas where barriers may exclude certain groups, and develop strategic recruitment plans to eliminate those barriers to the extent possible and to attract a qualified, diverse pool of applicants.

e.  Maintain and provide sufficient resources—including staffing, funding, and authority—for EEO officials to track workforce profiles that will help eliminate identified barriers and recruitment efforts that will assist officials with identifying potential barriers.  The resources provided should also include the information technology infrastructure (hardware, software, etc.) necessary to allow EEO officials to effectively produce workforce diversity statistics.

f.  Incorporate compliance with EEO laws and EEOC regulations in performance standards for all managers including SLS personnel.

**Management's Response.**  Concur.  Implementation of the recommendation will require the Public Printer's review and approval (see Appendix J).

**Evaluation of Management's Response.**  While GPO management concurred with the recommendation, they did not provide details regarding what actions the Agency plans to take to implement the recommendation.  As a result, pending receipt of details related to implementation, the recommendation is considered unresolved.  The OIG will work with GPO management to review any proposed actions to implement the recommendation.

## Finding B.  Incorporating GAO's Leading Diversity Management Practices

To date, GPO officials have partially adopted the nine practices identified by the GAO as the most common leading diversity management practices.  Specifically, the Agency has partially adopted one of the GAO leading practices and is actively working on developing a plan for another of the practices--succession planning.  GPO had not made decisions regarding adoption of the remaining practices at the time of the audit.  Similar to the key elements of EEOC MD-715 for creating and maintaining a model EEO program, adoption of the nine practices identified by the GAO would help further ensure that the agency has a diverse workforce and an effective EEO program.

### *The GAO Leading Practices*

In January 2005, GAO issued a report to the Ranking Minority Member, Committee on Homeland Security and Government Affairs, U.S. Senate entitled "Diversity Management: Expert-Identified Leading Practices and Agency Examples."[16]  This report identified nine leading practices to be considered when an organization is developing and implementing a diversity management program.  These nine practices were developed by GAO after speaking with experts in the field of diversity management and reviewing their publications.  The practices that GAO identified include:

- **Top leadership commitment**—a vision of diversity demonstrated and communicated throughout an organization by top-level management;

- **Diversity as part of an organization's strategic plan**—a diversity strategy and plan that are developed and aligned with the organization's strategic plan;

- **Diversity linked to performance**—the understanding that a more diverse and inclusive work environment can yield greater productivity and help improve individual and organizational performance;

- **Measurement**—a set of quantitative and qualitative measures of the impact of various aspects of an overall diversity program;

- **Accountability**—the means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives;

- **Succession planning**—an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization's potential future leaders;

- **Recruitment**—the process of attracting a supply of qualified, diverse applicants for employment;

---

[16] GAO 05-90, January 14, 2005, available at http://www.gao.gov/newitems/d0590.pdf

- **Employee involvement**—the contribution of employees in driving diversity throughout an organization; and

- **Diversity training**—organizational efforts to inform and educate management and staff about diversity.

We reviewed GPO's diversity programs to benchmark the Agency's standing in relation to GAO's nine leading diversity management practices. The results of our review are discussed in the following section and are summarized in Appendix D.

## 1. Top Leadership Commitment

A commitment of top leadership is the first leading practice that GAO identifies in its January 2005 report. That practice requires that the head of an agency and other senior officials commit themselves to diversity by incorporating the principles of EEO into an agency's organizational structure. The Public Printer issued a policy statement to all GPO employees on April 8, 2008, emphasizing his personal commitment to equal opportunity and diversity. (See Appendix E for the complete text of that statement). While the current Public Printer issued a signed policy statement to employees at the beginning of his tenure as Public Printer, over three years had elapsed since the previous Public Printer issued his statement on February 1, 2005. As previously recommended, the Public Printer should follow MD-715 guidance and continue to issue a signed policy statement annually to all employees addressing his commitment to diversity and EEO. This ongoing demonstration of commitment from the Public Printer is critical to the success of GPO's diversity and EEO programs.

## 2. Diversity as Part of an Organization's Strategic Plan

An emphasis on diversity as part of an organization's strategic plan is the second leading practice that GAO identifies in its January 2005 report. Such a practice requires an emphasis on integrating diversity management into an organization's strategic plan because it fosters a culture change that supports and values differences. Since it typically takes five to seven years to complete the initiatives of an agency's strategic plan, sustaining top leadership commitment to improvement is particularly challenging since the turnover rate for political appointees is just less than three years.[17] The Public Printer should link diversity to any future update of the Agency's Strategic Plan to ensure that EEO and diversity are considered an integral part of the agency's strategic mission.

## 3. Diversity Linked to Performance

The contribution that diversity plays in achieving improved individual and organizational performance is the next leading practice that GAO identifies in its January 2005 report. Diversity management makes good business sense, enhancing productivity and

---

[17] GAO, *High –Risk Series: Strategic Human Capital* Management, GAO-03-120 (Washington, D.C. January 2003) reported that governmentwide the average tenure of political appointees for 1990 through 2001 was just under three years.

innovation.  In addition, diversity management can help reduce costs by reducing turnover, increasing employee retention across demographic groups, and improving morale.  GPO should include the development of diversity management as part of its strategic plan.

## 4. Measurement

Quantitative and qualitative measures are vital tools in helping an agency evaluate the effectiveness of its diversity management in terms of return on investment, recruitment efforts, and retention.  These tools can also help an agency compute the return on their investments in areas such as diversity training and recruiting.  As previously noted, EEO officials have not been able to easily obtain workforce data to aid in such measurements. Further, the absence of written plans for attracting a supply of qualified, diverse applicants for employment, makes it difficult to measure success.

Since GPO has not implemented methods to measure or evaluate the effectiveness of the organization's diversity management, it was not possible to evaluate the return on investment for training or retraining.  This type of measurement is important because it provides an agency an idea of where barriers might be that are hindering success with diversity-related goals.  Although EEO officials informed us that GPO will adopt this GAO leading practice, it is our opinion that this decision should be made by the GPO Chief Human Capital Officer, who is responsible for workforce data and recruitment.

## 5. Accountability

Ensuring that managers maintain diversity, evaluate progress, and can manage diverse groups is the next leading practice that GAO identifies.  Accountability is defined by GAO as the means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives.  To accomplish accountability, organizations should link ratings and compensation.  The Government's Senior Executive Service corps is already held to that type of accountability—consistent with section 4313 of Title 5, which provides performance appraisal criteria for achieving EEO requirements.  This accountability is also consistent with the EEOC's instructions to Federal agencies implementing MD-715.[18]

At GPO, managers and supervisors are held to core EEO commitments in order to obtain performance bonuses.  As a point of interest, FY 2007 performance agreements for supervisors and the SLS corps contained a statement about EEO issues, whereas, in the FY 2008 agreements, that statement was changed.  For the differences in the two agreements, see the portion below highlighted in *italics*.

---

[18] The instructions describe the requirement that agencies inform managers and supervisors that success and a positive evaluation will include an assessment of how that manager contributes to the agency's EEO program by emphasizing to managers and supervisors that equality of opportunity is essential to attracting, developing, and retaining the most qualified workforce, with such a workforce being essential to ensuring the agency's achievement of its strategic mission.

**FY 2008 Performance Agreement**

I will make decisions in areas such as hiring, training, awards, special projects and developmental assignments without regard to sex, race, color, religion, national origin, age, disability, sexual orientation, or reprisal.  I will conduct myself in accordance with all applicable legal and ethical standards of behavior and will assist on and enforce these standards within my organization.  In the event that the above core commitment is not being met, the supervisor's rater must immediately provide guidance and advice to address any performance-related problems.

**FY 2007 Performance Agreement**

I will make decisions in areas such as hiring, training, awards, special projects and developmental assignments without regard to sex, race, color, religion, national origin, age, disability, sexual orientation, or reprisal *in order to nurture talent, create diverse opportunities and maximize the potential of GPO's workforce.  I will promote staff participation in EEO events and programs.  I will work with EEO to address and resolve allegations of discrimination and/or harassment within my organization.*

EEO officials stated that no decision had been made to adopt this practice although Human Capital officials stated that the draft EEO core commitment for FY 2009 performance agreements would be similar to the previous FY 2007 core commitment.  We recommend that the agency adopt core commitments that emphasize the value of creating a diverse workforce and address the culture of diversity as opposed to mere compliance with laws and regulations.

## *6.  Succession Planning*

Succession planning is the sixth leading practice that GAO identifies in its January 2005 report.  Succession planning is tied to the Federal Government's opportunity to change the diversity of the executive corps through new appointments and is a comprehensive, ongoing strategic process that enables management to forecast an organization's leadership needs.  Identifying and developing candidates who have the potential to be future leaders, and selecting individuals from among a diverse pool of qualified candidates to meet executive resource needs is at the heart of succession planning.

As Table 4 shows, in the last five years GPO has made significant progress in the overall diversity of its workforce. Specifically, in FY 2002, there were 32 Grade 15s consisting of 31 males (6 minorities) and one female (0 minorities). In FY 2007, there were 56 males (14 minorities) and 23 females (11 minorities).

**Table 4. 5-Year Trend Grade 15 (PG-15) Employees**

| Fiscal Year | 2002 | | 2007 | |
|---|---|---|---|---|
| **Males** | **Number** | **Percent** | **Number** | **Percent** |
| White | 25 | 78.2 | 42 | 53.1 |
| African American | 5 | 15.6 | 11 | 13.9 |
| Asian American/Pacific Islander | 1 | 3.1 | 1 | 1.3 |
| Hispanic American | 0 | 0.0 | 1 | 1.3 |
| Native American | 0 | 0.0 | 1 | 1.3 |
| **Total Males** | **31** | **96.9** | **56** | **70.9** |
| | | | | |
| **Females** | | | | |
| White | 1 | 3.1 | 12 | 15.2 |
| African American | 0 | 0.0 | 6 | 7.6 |
| Asian American/Pacific Islander | 0 | 0.0 | 5 | 6.3 |
| Hispanic American | 0 | 0.0 | 0 | 0.0 |
| Native American | 0 | 0.0 | 0 | 0.0 |
| **Total Females** | **1** | **3.1** | **23** | **29.1** |
| | | | | |
| **Overall Totals** | **32** | **100.0** | **79** | **100.0** |

The result of the progress GPO has made in their succession planning has affected the makeup of its SLS employees. As shown in Table 5 below, in FY 2002, there were 21 SLS employees consisting of 20 males (0 minorities) and one female (1 minority). In FY 2007, there were a total of 26 SLS employees consisting of 23 males (1 minority) and 3 females (2 minorities).

**Table 5. 5-Year Trend Senior Level Service (SLS) Employees**

| Fiscal Year | 2002 | | 2007 | |
|---|---|---|---|---|
| **Males** | **Number** | **Percent** | **Number** | **Percent** |
| White | 20 | 95.2 | 22 | 84.6 |
| African American | 0 | 0.0 | 0 | 0.0 |
| Asian American/Pacific Islander | 0 | 0.0 | 0 | 0.0 |
| Hispanic American | 0 | 0.0 | 1 | 3.9 |
| Native American | 0 | 0.0 | 0 | 0.0 |
| **Total Males** | **20** | **95.2** | **23** | **88.5** |
| | | | | |
| **Females** | | | | |
| White | 0 | 0.0 | 1 | 3.8 |
| African American | 1 | 4.8 | 2 | 7.7 |
| Asian American/Pacific Islander | 0 | 0.0 | 0 | 0.0 |
| Hispanic American | 0 | 0.0 | 0 | 0.0 |
| Native American | 0 | 0.0 | 0 | 0.0 |
| **Total Females** | **1** | **4.8** | **3** | **11.5** |
| | | | | |
| **Overall Totals** | **21** | **100.0** | **26** | **100.0** |

Another way GPO supports succession planning is through leadership programs.  A new program at GPO is called the Leadership, Development, and Recruitment (LDR) program.  The LDR program—a two-year career-building program—began in FY 2007.  As part of the LDR program, employees are recruited from both inside and outside the Agency.  The program allows employees to work in a number of business units to get a range of hands-on experience of GPO to become potential future leaders within those same business units.  In FY 2007, there were 13 employees—8 males (4 minorities) and 5 females (3 minorities)—enrolled in the LDR program.  The second LDR class began in June 2008 with seven employees—five males and two females (1 minority).  Table 6 provides more detail on the makeup of these two classes.

**Table 6.  Leadership Development and Recruitment (LDR) Program Employees**

| Fiscal Year | 2007 | | 2008 | |
|---|---|---|---|---|
| **Males** | **Number** | **Percent** | **Number** | **Percent** |
| White | 4 | 30.8 | 5 | 71.4 |
| African American | 3 | 23.0 | 0 | 0.0 |
| Asian American/Pacific Islander | 0 | 0.0 | 0 | 0.0 |
| Hispanic American | 1 | 7.7 | 0 | 0.0 |
| Native American | 0 | 0.0 | 0 | 0.0 |
| **Total Males** | **8** | **61.5** | **5** | **71.4** |
| | | | | |
| **Females** | | | | |
| White | 2 | 15.4 | 1 | 14.3 |
| African American | 3 | 23.1 | 1 | 14.3 |
| Asian American/Pacific Islander | 0 | 0.0 | 0 | 0.0 |
| Hispanic American | 0 | 0.0 | 0 | 0.0 |
| Native American | 0 | 0.0 | 0 | 0.0 |
| **Total Females** | **5** | **38.5** | **2** | **28.6** |
| | | | | |
| **Overall Totals** | **13** | **100.0** | **7** | **100.0** |

Although GPO can still improve the diversity of its SLS corps with the inclusion of Asian American/Pacific Islanders, Hispanic Americans, and Native Americans, in the last five years, GPO has worked to create a diverse pool of qualified candidates for future SLS positions at both the Grade 15 level and through implementation of the LDR program.

*7.  Recruitment*

Attracting a supply of qualified, diverse applicants for employment is the next leading practice listed by GAO.  GAO states that organizations can widen selection of schools from which they can recruit to include, for example, Historically Black Colleges and Universities, Hispanic-Serving Institutions, women's colleges, and schools with international programs.  Because of the number of Federal employees, including those in

senior level positions eligible for retirement in the next decade, the Federal Government will need more midcareer employees, defined by the GAO as employees generally 40 and older with 10 or more years of work experience.

In 2006, GPO hired a Recruitment Manager who worked with GPO managers including EEO and established a plan to recruit diverse candidates for a number of positions including the LDR Program. The Recruitment Manager along with other recruiters visited Historically Black Colleges and Universities and Hispanic-Serving Institutions. In addition, the manager used his personal contacts to generate renewed interest in GPO. A similar plan created in coordination with the EEO Manager is in place for 2008/2009. Also, the Hispanic Employment Program Manager e-mails job vacancies to 67 Hispanic organizations and to more than 800 Hispanic Employment Network individuals. Finally, significant recruitment planning, efforts and advertising took place in order to find diverse candidates to fill the positions at GPO's Secure Production Facility (SPF) in Mississippi. However, such efforts by Human Capital and EEO may not be fully realized in the absence of participation by the business unit managers making the employment selections. Accordingly, we recommend that the business unit managers responsible for employment selection and recruiting be included in outreach and recruitment efforts.

## 8. *Employee Involvement*

Employee involvement is GAO's eighth practice. Involving employees in diversity management helps contribute to diversity throughout the organization. Employees can get involved by: (1) forming employee diversity task forces, councils, boards, and networks to identify issues, recommend actions, and help develop initiatives to facilitate change; (2) providing mentoring opportunities to help identify and develop high-potential employees, improve employee productivity and performance, and promote retention and diversity; and (3) encouraging employees to volunteer in their communities and allocating mission personnel to participate in community outreach programs with private employers, public schools, and universities.

In its report, GAO provides an example of an agency that established a diversity advisory board and provided a visible forum for independent advice and assistance to management officials on diversity-related plans, policies, and programs. The same agency also created an advisory council chaired by a senior manager. The two groups contributed to the diversity strategic plan which was adopted by agency management. The diversity strategic plan had the following four objectives:

- Increased awareness of diversity values and sensitivities by senior management, managers, and staff.

- Retention of existing diversity and work-life enhancement.

- Active promotion of outreach and creation of a visible network of connections or routes to the agency.

- Recruitment and workforce planning for enhanced diversity.

GPO has several diverse employee groups such as the Federal Women's Program, Hispanic Employment Program, and the Disability Committee. These groups help identify issues and recommend actions to GPO management. These groups could also aid GPO management in the development of initiatives and recommendations for a diversity strategic plan similar to that identified in the GAO report.

In another effort to enhance employee involvement, the AEP Manager introduced GPO's Employee Mentoring Program in April 2008. The program is a formal six-month pilot with 11 mentors and protégés and is designed to enhance employee retention, job satisfaction, and cross-organizational communication through employees receiving teaching, guidance, counseling, and coaching from other GPO employees.

GPO also has very active employee involvement. As the GAO report emphasizes, employees should be empowered to address and identify diversity issues, recommend actions, and help develop initiatives to address concerns and create greater cultural and diversity awareness in the workplace for all employees. We recommend that GPO management evaluate its existing employee groups, identify whether employees' issues are fully represented and ensure that the groups are meeting the objectives as identified by GAO.

### 9. Diversity Training

GAO's ninth practice of training can help an organization's management and staff increase their awareness and understanding of diversity as well as help it develop concrete skills for assisting it with communicating and increasing productivity. Training can provide employees with an awareness of their differences—including cultural, work style, and personal presentation-and an understanding of how diverse perspectives can improve organizational performance. GAO also states that to increase employee effectiveness in a diverse environment, training should include teambuilding, communication styles, decision-making, and conflict resolution.

EEO officials informed us that GPO plans to adopt this leading practice. The OIG believes that officials from both EEO and Human Capital should work together to develop a diversity training curriculum that can be provided to all GPO employees.

## Recommendation

2. The Public Printer should adopt all or a combination of the leading practices GAO recommends to create and maintain a positive work environment with qualified and diverse senior officials by taking the following steps:

   a. Continue to issue to all employees an annual policy statement on his personal commitment to equal opportunity and diversity.

b. Link diversity to GPO's strategic plan.

c. Include the development of diversity management in its strategic plan.

d. Develop a data gathering and tracking system for workforce data that will help the agency eliminate identified barriers.

e. Develop a written plan for attracting a supply of qualified, diverse applicants for employment, identifying quantitative and qualitative performance measures that can track data on its workforce to evaluate the effectiveness of the Agency's diversity management efforts as well as track the return on investment in such areas as diversity training and recruitment.

f. Ensure that managers are responsible for diversity in their business units and that awards are based partly on a manager's success in achieving diversity-related goals.

g. Identify, develop, and select candidates for new appointments who have the potential to be future leaders from a diverse pool of qualified candidates.

h. Empower employees to get involved in diversity management by forming employee task forces, councils, and boards that identify issues and recommend actions to the diversity strategic plan.

i. Develop a diversity training program for managers and employees that increases awareness and understanding of diversity as well as help develop concrete skills to assist in communicating and increasing productivity.

**Management's Response.** Concur. Implementation of the recommendation will require the Public Printer's review and approval (see Appendix J).

**Evaluation of Management's Response.** While GPO management concurred with the recommendation, they did not provide details regarding what actions the Agency plans to take to implement the recommendation. As a result, pending receipt of details related to implementation, the recommendation is considered unresolved. The OIG will work with GPO management to review any proposed actions to implement the recommendation.

# Appendix A.  Objectives, Scope, and Methodology

**Objectives**

The overall objective of the audit was to conduct a review of the diversity office within the GPO at the request of the Subcommittee on Federal Workforce, Postal Service, and the District of Columbia, Committee on Oversight and Government Reform, House of Representatives.  The Subcommittee expressed concern about the under representation of women and minorities in the senior-level positions at the legislative branch agencies. The GPO OIG was one of five legislative branch agencies jointly conducting this review. The other legislative branch agencies participating in the review are the Library of Congress, Government Accountability Office, Architect of the Capitol, and U.S. Capitol Police.  Participating agencies will issue a consolidated report to Congress by September 2008.

The specific audit objectives were to:

- Identify and assess the diversity program at GPO to determine if it is yielding the desired results, that of creating a more diverse population of women and minorities in top leadership positions (SLS).

- Evaluate the accuracy and completeness of the complaints and discrimination data being reported to the Congress.

- Assess to what degree the diversity offices are independent of the GPO's General Counsel and the Public Printer

**Scope and Methodology**

To be consistent in our scope and methodology in reporting each particular agency's position to the three specific objectives, we followed a uniform audit guide provided to each participating OIG by the Library of Congress OIG.  To address the audit objectives, we:

1. Assessed the responses that the EEO Director provided in the: (1) Self-Assessment Checklist in MD-715 which identifies the effectiveness of the GPO diversity programs; and (2) Data Collection Instrument for Leading Diversity Management Practices which gauges the agency's progress in following leading diversity management practices as of January 1, 2008.

2. Evaluated the accuracy and completeness of GPO's complaint and discrimination data for Fiscal Year 2007.

3. Assessed the current independence of GPO's EEO Director and the diversity programs with the Public Printer and GPO's General Counsel.

We also interviewed officials from the Offices of the General Counsel and Human Capital to determine whether policies and procedures related to EEO were implemented and followed.  Human Capital officials also provided workforce profile reports and documentation on recruiting applicants for Agency leadership programs.

**Management Controls Reviewed**

We reviewed management controls related to EEO areas, including complaint and discrimination reports as well as the reporting of data for workforce profile reports to ensure these practices are contained in GPO Instruction 825.18A.

**Audit Field Work**

We performed field work from April through August 2008 at the GPO Central Office in Washington, D.C.  We performed the audit in accordance with generally accepted government auditing standards.

## Appendix B.  Assessment of Whether GPO Practiced the Essential Elements of EEOC Management Directive 715

| | Essential Element | Generally Following | Not Following |
|---|---|---|---|
| 1. | Demonstrated Commitment from Leadership | X | |
| 2. | Integration of EEO into the Strategic Mission | | X[19] |
| 3. | Management and Program Accountability | | X[20] |
| 4. | Proactive Prevention | | X[21] |
| 5. | Efficiency | X | |
| 6. | Responsiveness and Legal Compliance | X | |

---

[19] Although GPO followed the four parts of Element B, the previous strategic plan did not address EEO.

[20] Although GPO followed portions of Element C, it did not include the portions for business unit managers developing EEO plans and EEO and Human Capital officials identifying any systemic barriers in past promotions, training, and awards.

[21] Because the data that Human Capital official provided was limited, the AEP Program Manager could not conduct an annual self-assessment to monitor the progress and identify areas where barriers may operate to exclude certain groups.

# Appendix C.  White and Blue Collar Workforce Profile by Grade, Race, and Sex (As of January 28, 2008)

| Grade | Total Employees | | | White | | Black | | Hispanic | | Asian / Pacific Islander | | American Indian | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | All | Men | Women | Men | Women | Men | Women | Men | Women | Men | Women | Men | Women |
| WHITE COLLAR WORKFORCE | | | | | | | | | | | | | |
| SLS | 26 | 23 | 3 | 22 | 1 | | 2 | 1 | | | | | |
| **15** | 79 | 56 | 23 | 42 | 12 | 11 | 6 | 1 | | 1 | 5 | 1 | |
| 14 | 95 | 60 | 35 | 46 | 24 | 8 | 10 | 3 | 1 | 3 | | | |
| 13 | 207 | 108 | 99 | 69 | 54 | 28 | 39 | 2 | 1 | 8 | 4 | 1 | 1 |
| **12** | 303 | 128 | 175 | 79 | 72 | 45 | 91 | | 2 | 4 | 8 | | 2 |
| 11 | 80 | 28 | 52 | 17 | 12 | 9 | 38 | 2 | 1 | | 1 | | |
| 10 | 4 | 1 | 3 | | | | 3 | 1 | | | | | |
| 9 | 77 | 20 | 57 | 10 | 13 | 9 | 43 | | | 1 | | | 1 |
| 8 | 15 | 1 | 14 | | 2 | 1 | 12 | | | | | | |
| 7 | 95 | 15 | 80 | 8 | 19 | 6 | 56 | 1 | 3 | | 2 | | |
| 6 | 60 | 12 | 48 | 2 | 7 | 8 | 40 | 1 | 1 | 1 | | | |
| 5 | 91 | 49 | 42 | 13 | 10 | 31 | 29 | 5 | 3 | | | | |
| 4 | 13 | 4 | 9 | 2 | 6 | 2 | 3 | | | | | | |
| 3 | 8 | 6 | 2 | 2 | 2 | 4 | | | | | | | |
| **2** | 4 | 3 | 1 | 1 | 1 | 2 | | | | | | | |
| **0** | 6 | 4 | 2 | 2 | 2 | 1 | | | | 1 | | | |
| **Subtotal** | **1163** | **518** | **645** | **315** | **237** | **165** | **372** | **17** | **12** | **19** | **20** | **2** | **4** |
| BLUE COLLAR WORKFORCE | | | | | | | | | | | | | |
| **Subtotal** | **1100** | **789** | **311** | **296** | **57** | **473** | **250** | **9** | | **7** | **4** | **4** | |
| | | | | | | | | | | | | | |
| GPO # | **2263** | **1307** | **956** | **611** | **294** | **638** | **622** | **26** | **12** | **26** | **24** | **6** | **4** |

Source: GPO Office of Human Capital

# Appendix D. Assessment of Whether GPO Exemplifies GAO's Leading Practices for Diversity Management

| | Leading Diversity Practices[22] | Not Yet Adopted | | | | | Level of Adoption | |
|---|---|---|---|---|---|---|---|---|
| | | Do not anticipate adopting | No decision | Will adopt | Plan under development | Written plan complete | Partially adopted | Fully adopted |
| 1. | **Top leadership commitment** – a vision of diversity demonstrated and communicated throughout an organization by top-level. | | | | | | X[23] | |
| 2. | **Diversity as part of an organization's strategic plan** – a diversity strategy and plan that are developed and aligned with the organization's strategic plan. | | X | | | | | |
| 3. | **Diversity linked to performance** – the understanding that a more diverse and inclusive work environment can yield greater productivity and help improve individual and organizational performance. | | X | | | | | |
| 4. | **Measurement** – a set of quantitative and qualitative measures of the impact of various aspects of an overall diversity program. | | X | | | | | |
| 5. | **Accountability** – the means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives. | | X | | | | | |
| 6. | **Succession planning** – an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization's potential future leaders. | | | | X[24] | | | |
| 7. | **Recruitment** – the process of attracting a supply of qualified, diverse applicants for employment. | | X | | | | | |
| 8. | **Employee involvement** – the contribution of employees in driving diversity throughout an organization. | | X | | | | | |
| 9. | **Diversity training** – organizational efforts to inform and educate management and staff about diversity. | | X | | | | | |

---

[22] GAO report GAO-05-09, "Diversity Management Expert-Identified Leading Practices and Agency Examples," January 2005.

[23] Based on the Public Printer's April 8, 2008, letter on equal opportunity and diversity.

[24] The Human Capital Office did not have a written plan. However, GPO has made progress in the last five years to create a diverse pool of qualified candidates at the Grade 15 level and the implementation of the LDR program.

# Appendix E. Public Printer's April 8, 2008 Letter on Equal Opportunity and Diversity

**GPO**
U.S. GOVERNMENT
PRINTING OFFICE
KEEPING AMERICA INFORMED

Robert C. Tapella
Public Printer

April 8, 2008

To All GPO Employees:

As Public Printer I want to emphasize my personal commitment to equal opportunity and diversity. It is imperative that we treat fairly all employees, applicants for employment, and customers of the U.S. Government Printing Office (GPO). Employment actions must be based upon merit principles and made without regard to an individual's race, color, religion, national origin, sex, age, mental/physical disability or sexual orientation.

Since becoming Public Printer at GPO, I have made it clear that I will not tolerate any form of discrimination in the workplace. I firmly believe that every GPO employee is entitled to work in an environment that is free of discrimination and harassment. I am committed to ensuring that every individual in GPO enjoys that right without regard to non-merit factors. This environment is necessary for accomplishing our goal of attracting, hiring, developing and retaining a quality diverse workforce that achieves our mission and meets the expectations of our citizens and the visitors we serve.

It is the policy of GPO to provide equal employment opportunity for all persons in its workforce, as well as applicants for employment and to prohibit discrimination in all aspects of its personnel policies, program practices and operations. Every GPO manager and supervisor is responsible for ensuring that we achieve that goal. I expect a "zero tolerance" approach to this important area. I take any confirmed violations of this policy very seriously. Employees who violate the law will be held accountable for their conduct. I encourage every level of management to maintain a high level of awareness regarding these matters and to foster a steadfast commitment to equal opportunity for all persons. I expect managers and supervisors to respond to complaints swiftly and appropriately, as they will be held accountable for taking steps to eliminate such behavior and to ensure that the work environment is one where employees are treated fairly, respectfully and with dignity.

As Public Printer, I will vigorously pursue these goals and I encourage all employees to fully support our commitment in principle and in action to ensure that our equal employment opportunity programs are successful. Each of you plays a part in creating and sustaining a workplace that will provide all employees with a working environment free from discrimination where individual differences are respected and valued.

Sincerely,

*[signature]*

# Appendix F.  Summary of Leading Practices GPO Followed
## (From PricewaterhouseCoopers[25] Study and
## EEOC Management Directive 715[26])

| | Diversity Program Characteristics | Following | Generally Following | Not Following |
|---|---|---|---|---|
| 1. | Diversity Program housed separate from the EEO office? | | | X |
| 2. | Agency has a diversity action or strategic plan? | | | X |
| 3. | Agency is conducting targeted recruitment and outreach efforts to attract potential under represented minority employees? | | X | |
| 4. | Mentoring Program? | X | | |
| 5. | Includes awareness events (for example, special emphasis functions)? | X | | |
| 6. | Includes a diversity council? | | | X |
| 7. | Agency encourages the development of formally or informally constituted groups representing specific categories of employees such as women, African Americans, or gays and lesbians? | | X | |
| 8. | Includes focus on conflict management (for example, alternative dispute resolution or mediation)? | X | | |
| 9. | Diversity training required for managers and supervisors? | | | X |
| 10. | Diversity training included in employee orientation? | | | X |
| 11. | Have administered attitude survey as part of assessment? | X | | |
| 12. | Diversity element in supervisors/managers performance plans? | | | X |
| 13. | Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to equal opportunity? | | X | |
| 14. | Does the EEO Director have the authority and funding to ensure implementation of agency EEO action plans? | X | | |
| 15. | The agency tracks the race, national origin and sex of applicants for both permanent and temporary employment? | | | X |
| 16. | The agency tracks the rates of selections for promotions by race, national origin and sex? | | | X |
| 17. | The agency tracks the rates of training opportunities (hours per year) by race, national origin and sex? | | | X |
| 18. | The agency tracks the rates of performance incentives (monetary awards, step increases) by race, national origin and sex? | | | X |
| 19. | The agency tracks the rates of complaints by race, national origin and sex to see if a particular group has more complaints about promotions, disciplinary actions, performance appraisals, or awards? | X[27] | | |
| 20. | The agency tracks the rates of both voluntary and involuntary separations from employment by race, national origin and sex? | | | X |

---

[25] "A Changing Workforce: Understanding Diversity Programs in the Federal Government" December 2001.

[26] This table will be included in the consolidated report of the five Legislative Branch agencies to Congress.

[27] The EEO Office uses this information in their semiannual meetings with business units that began in October 2007.

# Appendix G.  Accuracy and Completeness of EEO Data[28]

## Tracking and Reporting the Number and Status of Discrimination Complaints

GPO's EEO Office uses EEONET, a case management system built to assist EEO managers and counselors in managing all aspects of information and program management related to EEO complaints and resolutions. Built to support the EEOC reporting requirements, EEONET allows automated generation of reports required by EEOC as well as a variety of other reports and documentation that can be customized to user and management requirements.  The data in EEONET are supported by the manual files kept as well as a monthly report that is kept to ensure the data is accurate when it is entered into the system.  GPO's EEO office is required to submit annually EEOC Form 462 report.  EEOC incorporates the data along with the other agencies and report it to Congress.  Although the format between "No Fear Act" and EEOC's 462 are somewhat different, the data collected are the same.  One key difference is that the "No Fear Act" reporting reflects comparative data for the previous 5 years; EEOC Form 462 report includes activity that occurred during the preceding fiscal year.

| No. | Discrimination Complaints | Yes | No |
|-----|---------------------------|-----|-----|
| 1 | Does the agency have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data? | X | |
| 2 | Does the agency use a complaint tracking system that allows identification of the location and status of complaints, and length of time elapsed at each stage of the agency's complaint resolution process? | X | |
| 3 | Does the agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends? | X | |
| 4 | Is the agency statutorily mandated to follow the No Fear Act reporting requirements? | | X |
| 4a | Does the agency follow the No Fear Act reporting format? | | X |
| 4b | Does the agency post its No Fear Act (or similar) data on its web site? | | X |

---

[28] This table will be included in the consolidated report of the five Legislative Branch agencies to Congress.

# Appendix H.  Independence of the Diversity Office[29]

**Independence**

| No. | | Yes | No |
|---|---|---|---|
| 1 | Has the agency placed the EEO Director in a direct reporting relationship with the head of the agency? | X | |
| 2 | Does the EEO Director have a regular and effective means of informing the agency head and other top management officials of the effectiveness, efficiency and compliance (with agency regulations or EEOC Directives, if applicable) of the agency's EEO program? | X | |
| 3 | Is the EEO investigative and decision making process separate from the personnel function? | X | |
| 4 | Are the legal sufficiency reviews done by a unit separate from the personnel function? | X | |
| 5 | Does the agency offer Alternative Dispute Resolution or mediation? | X | |

---

[29] This table will be included in the consolidated report of the five Legislative Branch agencies to Congress.

# Appendix I.  Acronyms Used in the Report

| | |
|---|---|
| AEP | Affirmative Employment Program |
| CCPD | Counseling and Complaints Processing Division |
| EEO | Equal Employment Opportunity |
| EEOC | Equal Employment Opportunity Commission |
| EEONET | Equal Employment Opportunity Network |
| FWP | Federal Women's Program |
| FY | Fiscal Year |
| GAO | Government Accountability Office |
| GEM | GPO Employee Mentoring Program |
| GPO | Government Printing Office |
| GS | General Schedule |
| HEP | Hispanic Employment Program |
| LDR | Leadership, Development, and Recruitment Program |
| MD | Management Directive |
| OIG | Office of Inspector General |
| PG | Printing Office Grade |
| SES | Senior Executive Service |
| SLS | Senior Level Service |

**GPO** U.S. GOVERNMENT PRINTING OFFICE
KEEPING AMERICA INFORMED

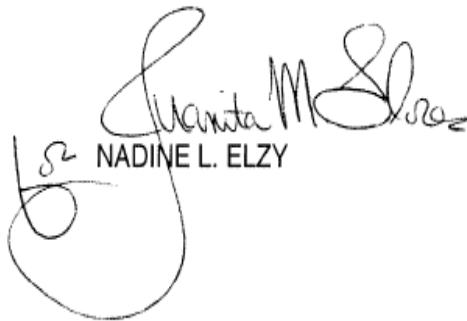# memorandum

DATE:     September 10, 2008

REPLY TO
ATTN OF:     Director, Equal Employment Opportunity

SUBJECT:     Revised Draft Report on Audit of Diversity Management Programs at the GPO

TO:     Assistant IG for Audits and Inspection

This is in response to your memorandum dated September 9, 2008, requesting comment on the above subject report.  I fully concur with the recommendations outlined in the above subject report.  However, it would require the Public Printer's review and approval before implementation.

Please contact me or Juanita M. Flores at (202) 512-2014 if you have any questions.

NADINE L. ELZY

**GPO** U.S. GOVERNMENT PRINTING OFFICE
KEEPING AMERICA INFORMED
WASHINGTON, DC 20401

**Memorandum**
HUMAN CAPITAL OFFICE

DATE: September 10, 2008

REPLY TO
ATTN OF: Chief Human Capital Officer

SUBJECT: Draft Report on Audit of Diversity Management Programs at the GPO

TO: Assistant IG for Audits and Inspection

This is in response to your September 9, 2008 memorandum requesting comments on the revised draft report on the Audit of Diversity Management Program at the GPO. After a thorough review, we note that the changes made as a result of the September 5 meeting between the IG, EEO and Human Capital managers have greatly improved the report.

As far as the two recommendations are concerned, our office concurs with each of them. Thank you for the opportunity to review the draft. I am sure the report will have a positive impact to create a more diverse GPO in the future.

William T. Harris

# Appendix K.  Status of Recommendations

| Recommendation No. | Resolved | Unresolved | Open/ECD* | Closed |
|:---:|:---:|:---:|:---:|:---:|
| 1 | | X | | |
| 2 | | X | | |

*Estimated Completion Date.

# Appendix L.  Report Distribution

**Government Printing Office**

Deputy Public Printer
Chief of Staff
Chief Management Officer
Chief Financial Officer
Chief Information Officer
Chief Technology Officer
Director, Congressional Relations
Director, Library Services and Content Management
Director, Public Relations
Director, Publication and Information Sales
General Counsel
Managing Director, Customer Services
Managing Director, Official Journals of Government
Managing Director, Plant Operations

# Major Contributors to the Report

Joseph J. Verch Jr., Supervisory Auditor