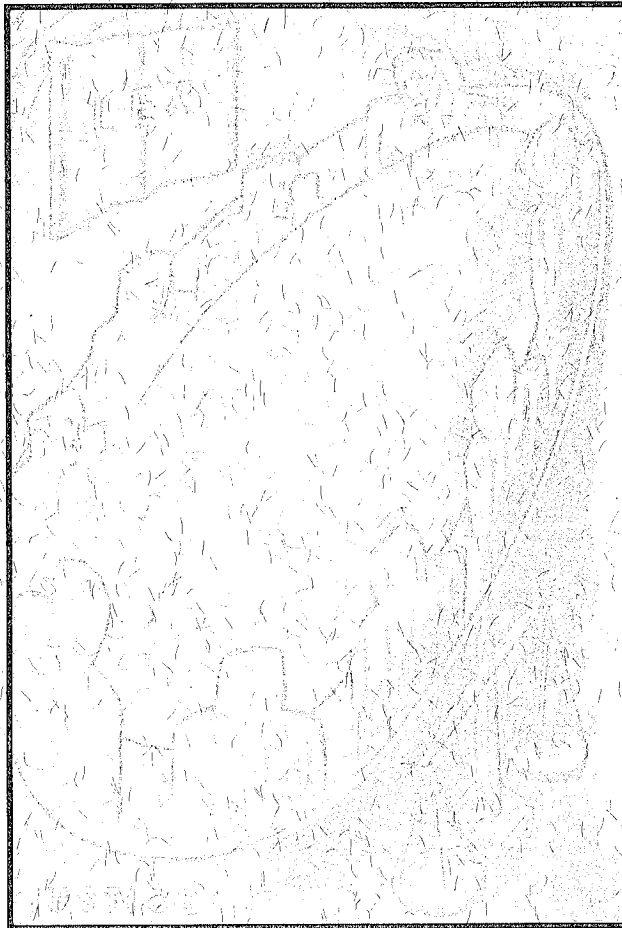
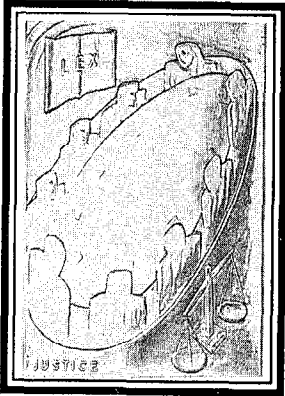


E E O O V E R S I G H T

PERSONNEL APPEALS BOARD





Personnel
Appeals
Board

February 10, 1993

Office of the Chair

The Honorable Charles A. Bowsher
Comptroller General
United States General Accounting Office
Room 700A
441 G Street, N.W.
Washington, D.C. 20548

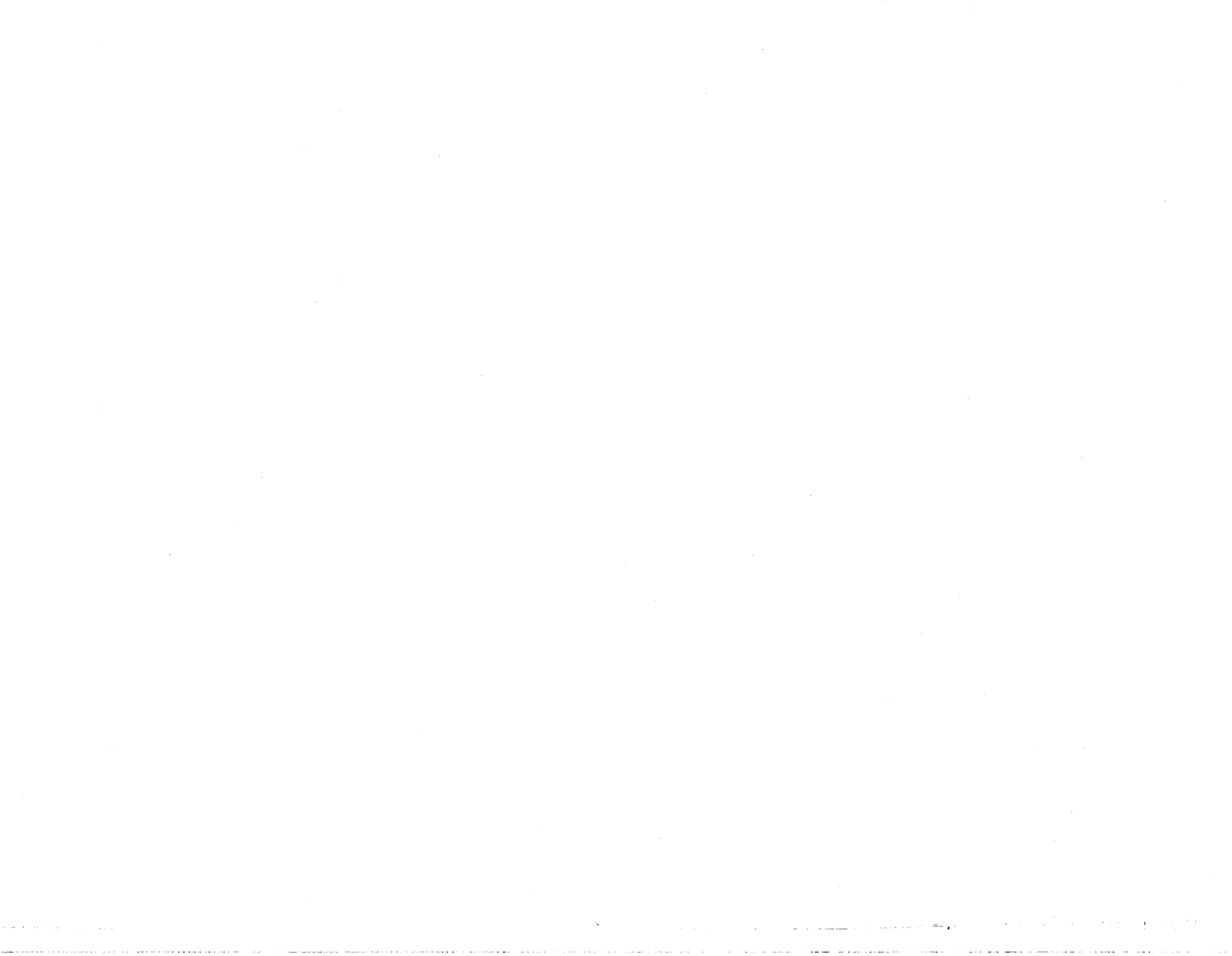
Dear Mr. Bowsher:

Please find enclosed a copy of the "EEO Oversight Report on GAO's Affirmative Action Planning Process," a report by the Personnel Appeals Board of the United States General Accounting Office. The report, issued pursuant to section 732(f)(2)(A) of the General Accounting Office Personnel Act of 1980, as amended, surveys the components of the affirmative action process at GAO. In exercising its authority to conduct oversight studies, the Board examined aspects of GAO's affirmative action program that focus on women and minorities.

The activities of the Board with respect to its oversight directive represent the fulfillment of its congressional mandate to ensure that employees of the General Accounting Office are afforded the same rights as their executive branch counterparts. The Board considers GAO's continued commitment to its objective of having a diverse and representative workforce to be a positive step in achieving a model for Federal service.

Sincerely,

Alan S. Rosenthal
Chairman



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Abbreviations

EEO	equal employment opportunity
EEOC	Equal Employment Opportunity Commission
GAO	General Accounting Office
GAOPA	General Accounting Office Personnel Act
GS	General Schedule
OAAP	Office of Affirmative Action Plans
OCR	Office of Civil Rights
PAB	Personnel Appeals Board
PFP	Pay-for-Performance

Introduction

This report reviews affirmative action efforts of the General Accounting Office concerning women and minorities.¹ The purpose of the review was to determine the manner in which GAO conducts, develops, and implements its affirmative action program.

In 1980, the Congress passed the General Accounting Office Personnel Act (GAOPA), 31 U.S.C. 732 *et seq.* That act authorized GAO, within certain boundaries, to establish for itself a personnel system that would be independent of the adjudicatory, administrative, and oversight responsibilities of those executive branch agencies involved in personnel and personnel-related matters in the federal government. By enacting this legislation, the Congress sought to release GAO from any potential conflict that might arise in carrying out its responsibilities for evaluating executive branch agencies involved in personnel and personnel-related matters. At the same time, the Congress consolidated a number of personnel-related protections for GAO employees and applicants for employment.

The Personnel Appeals Board (PAB or Board) of the General Accounting Office was created by the GAOPA to afford GAO employees and applicants for employment an avenue of redress separate from the executive branch agencies that adjudicate and oversee various personnel-related protections on behalf of executive branch employees and applicants for employment. Thus, the PAB was given essentially the same responsibilities for adjudicating certain personnel-related activities at GAO as the Equal Employment Opportunity Commission (EEOC), the Federal Labor Relations Authority, and the Merit Systems Protection Board have in the executive branch. Further, the Board was given oversight authority regarding GAO's equal employment opportunity (EEO) program.

Among other things, the GAOPA granted employees and applicants for employment with GAO the protections granted to executive branch employees by Section 717 of the Civil Rights Act of 1964, as amended (42 U.S.C. §2000e-16). Section 717 provides for the establishment and implementation of plans to further the equal employment opportunities of women and minorities in the federal sector. As amended in 1972,² the Civil Rights Act of 1964 specifically exempted GAO's excepted service

¹The Board previously issued a report that dealt with, among other related matters, GAO's affirmative action activities concerning persons with disabilities. See *EEO Oversight Study of GAO's Employment of Persons with Disabilities*, September 1990.

²P.L. 88-352, title VII, section 717, as added, P.L. 92-261, section 11, Mar. 24, 1972, 86 Stat. 111.

employees³ from its coverage.⁴ With the passage of the GAOPA in 1980, the Congress abolished this exemption and GAO became covered by title VII.⁵ This statutory mandate has been implemented by GAO in an evolutionary manner with different units having responsibilities at different times. GAO has reviewed and altered its organizational structure to accommodate differing strategies for achieving equal employment opportunity.

From 1980 until 1986, GAO's Office of Civil Rights (OCR) was responsible for affirmative action planning for the agency. In 1986, GAO established the Office of Affirmative Action Plans (OAAP). That office's responsibilities are set out in GAO Order 0130.1.27, "Office of Affirmative Action Plans" and include

- providing direction, guidance and support to division, office, and region heads for setting and implementing affirmative action goals;
- monitoring the accomplishments of unit⁶ heads in achieving affirmative action goals and objectives; and
- evaluating results achieved under affirmative action plans.

This report focuses on the activities of OAAP from 1987 to 1990.⁷

Objectives, Scope, and Approach

The Board's review of GAO's affirmative action activities covered

- GAO's strategy for developing affirmative action plans
- the implementation of this strategy
- the approaches used in the affirmative action plans for various job categories within GAO, and
- the aspects of management accountability for implementing affirmative action strategies.

Inasmuch as one objective of the GAOPA is to secure essentially the same equal employment protection for GAO employees and applicants for employment with GAO that exists for executive branch employees and applicants under title VII of the Civil Rights Act, the Board compared the

³Excepted service employees in the federal government are those who do not enter the service through competitive exams administered by the Office of Personnel Management.

⁴See *Lawrence v. Staats*, 640 F.2d 427 (D.C. Cir.1981).

⁵P.L. 96-191, section 8(g), Feb. 15, 1980, 94 Stat. 34.

⁶GAO has headquarters offices and divisions and regional offices. In this report they are referred to as units.

⁷OCR is responsible for EEO complaint counseling and discrimination complaint processing.

strategies used for executive branch employees with those employed at GAO.

The Board reviewed GAO's regulations and orders relating to affirmative action and related employment policies. The Board forwarded a series of questions to GAO concerning the operation of the agency's affirmative action program. Board staff met with GAO officials responsible for this program. All headquarters instructions for affirmative action plan preparation and reporting unit submissions related to those instructions, for the years covered by this report, were requested. GAO provided all requested information. The Board reviewed all headquarters instructions and then analyzed the reporting units' submissions to determine if the instructions were being implemented, how they were being implemented, if all reporting requirements were being met, and if timely submissions were being made.

Results in Brief

GAO has evidenced a continuing commitment to affirmative action. During the period reviewed, GAO has maintained an affirmative action plan that is designed to ensure management participation. This plan is formulated on a headquarters office, division, and regional office basis. GAO has vested responsibility for affirmative action planning with its unit heads. The design of the plan does not contain a national or a GAO-wide component. GAO's implementation of its affirmative action plan and the lack of a national plan prevent GAO from looking at the totality of its efforts and thereby deprive GAO of the ability to assess the successes or deficiencies of its affirmative action program on a national level. These elements also limit an appraisal of affirmative action activities.

The agency should identify its EEO groups more discretely, by using "gender plus"⁸ categories to conduct a more meaningful representation analysis. GAO currently does not differentiate between minority men and minority women in affirmative action planning.

GAO should develop a standardized method for calculating underrepresentation and setting priorities for affirmative action goals.

Because GAO's Pay-for-Performance (PFP) system affects the pay and promotion of almost 73 percent of GAO's employees, the distribution of pay and bonuses should be analyzed as a part of the affirmative action

⁸Throughout this report, the term "gender plus" refers to the identification of groups by gender plus racial and national origin status. These categories are used throughout the executive branch for affirmative action planning.

program. The analysis of PFP as a component of the affirmative action plan should focus on the identification and removal of any barriers to EEO that may exist in this pay system.

As a part of its affirmative action plan, GAO looks at the equity of job assignments and job roles that employees are given to help determine if and how these assignments and roles constitute a barrier to EEO. GAO permits several approaches to this analysis, which makes it difficult to measure and compare results for all reporting units. The identification of job roles and the job assignment process as an affirmative action component should be standardized to avoid this limitation.

Title VII requires that training be included as a component of an affirmative action plan. GAO should revise its plan to include training.

Legal Background

Title VII of the Civil Rights Act of 1964, as amended, prohibits federal agencies from engaging in employment discrimination based on race, color, religion, sex, or national origin. Each agency is required to develop "a national and regional equal employment opportunity plan ... in order to maintain an affirmative program of equal employment opportunity for all such employees and applicants for employment."⁹ Each plan must contain the following minimum requirements:

"(1) provision for the establishment of training and education programs designed to provide a maximum opportunity for employees to advance so as to perform at their highest potential; and

(2) a description of the qualifications in terms of training and experience relating to equal employment opportunity for the principal and operating officials . . . responsible for carrying out the equal employment opportunity program and of the allocation of personnel and resources proposed . . . to carry out its equal employment opportunity program."¹⁰

As noted earlier, when the Congress enacted the GAOPA, it amended title VII to clarify that these requirements also applied to GAO.¹¹ Thus, GAO is

⁹Section 717 of title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e-16(b).

¹⁰See note 9.

¹¹General Accounting Office Personnel Act of 1980, P.L. No.96-191, §8(g), 94 Stat. 27, 34.

subject to a statutory obligation to carry out such an affirmative action program.¹²

GAO has acknowledged its obligation to engage in affirmative action in its regulations and operating orders. GAO regulations provide:

“Equal employment opportunity is an integral part of every merit system. Affirmative action plans, designed to provide a work force reflective of the Nation’s diversity, must assure that both in operation and results the merit system reflects equal opportunity at every step of the personnel process.”¹³

In addition to requiring affirmative action plans to achieve EEO in the federal work force, title VII provides “. . . for the establishment of training and education programs designed to provide a maximum opportunity for employees to advance so as to perform at their highest potential.” These are commonly referred to as upward mobility programs.¹⁴ Thus, the Congress envisioned a two-pronged approach that sought not only to facilitate access but also to foster upward movement within the federal work force.

Data Availability Problems

During 1990 and 1991, GAO gave testimony and issued a series of reports to the Congress concerning affirmative action and equal employment in the executive branch.¹⁵ As a part of this effort, GAO sought to inform the Congress of the continuing need for affirmative action in federal employment.

¹²In enacting the General Accounting Office Personnel Act of 1980, the Congress was emphatic in expressing its intent not to disrupt ongoing affirmative action obligations and efforts. See, P.L. 96-191, §3(b)(2), 94 Stat. 27 (“Nothing in this section prohibits or restricts any lawful effort to achieve equal employment opportunity through affirmative action.”), codified at 31 U.S.C. §732(f)(3).

¹³4 C.F.R. §2.4(b)(45 FR 6875, Oct. 15, 1980). 4 C.F.R. §7.2(b) supports this general policy statement by providing:

GAO shall conduct continuing programs for the recruitment of members of minorities and women for positions in GAO in a manner designed to eliminate underrepresentation of minorities and women in the various categories of employment in GAO. Special efforts will be directed at recruiting in minority communities, in educational institutions, and from other sources from which minorities can be recruited. GAO will conduct a continuing program of evaluation and oversight of such recruiting programs to determine their effectiveness in eliminating minority and women underrepresentation.”

¹⁴See section 717, title VII, 42 U.S.C. §2000e-16(b).

¹⁵See, for example, Federal Workforce: Continuing Need for Federal Affirmative Employment (GAO/GGD-92-27BR, Nov. 27, 1991) and Federal Affirmative Action: Better EEOC Guidance and Agency Analysis of Underrepresentation Needed (GAO/GGD-91-86, May 10, 1991).

Setting affirmative action goals involves use of external statistical data that permit an accurate comparison of an EEO group's representation in the employer's work force. GAO has addressed the availability of such data in its review of the affirmative action planning process in the executive branch. As GAO's Director of Federal Resource Management Issues stated in testimony before the Senate Committee on Governmental Affairs:

"We found no single source of data that is without limitations. For example, census data, in addition to becoming outdated, may require adjustment for the under-counting of minorities, a matter that is currently before the courts. The Bureau of Labor Statistics' current population data, . . . , are based on monthly household surveys that do not include enough households to provide a statistically sound representation of all minority groups. The degrees conferred data apply only to jobs with education requirements, do not cover as many occupations as census data, may lag a year or so in being current, and may require more data than that for a single year. Other limitations for these sources may also exist."¹⁶

The lack of adequate comparative statistical data that GAO found in reviewing programs in the executive branch was also present in the Board's review of GAO's affirmative action program. Thus, the Board concluded that its review of GAO's affirmative action plan would best serve GAO and its employees at this time if it focused on the process the agency had undertaken and the progress that had been made in achieving the intent of that process.

Affirmative Action in the Executive Branch

The Equal Employment Opportunity Commission is responsible for the annual review and approval of executive branch agencies' affirmative action plans.¹⁷ Pursuant to this responsibility, EEOC issues management directives informing executive branch agencies of the Commission's standards for preparing of affirmative action plans.¹⁸ EEO-MD-714, dated October 6, 1987, constitutes the current instructions issued by the Commission. The directive contains seven policy statements regarding fundamental elements needed ". . . to develop a systematic multifaceted methodology for affirmative employment programs . . ." These elements are as follows:

¹⁶Federal Affirmative Employment, Status of Women and Minority Representation in the Federal Workforce (GAO/T-GGD-92-2), Oct. 1991.

¹⁷Title VII of the Civil Rights Act of 1964, as amended, section 717, 42 U.S.C §2000e-16(b)(1).

¹⁸The Board notes that to date the Board has not issued instructions to GAO on the preparation of GAO's affirmative action plan but rather has chosen to assume an evaluative posture.

“ Strong commitment by the Head of the Agency through a clear delegation of authority to Senior Managers;

- Management accountability systems for holding Senior Managers responsible for achieving Agency EEO objectives;
- Identification and removal of barriers at all levels of the work force;
- Aggregation of the agency work force into agencywide, major operating component (MOC) wide, commandwide, regionwide, and installation program plans;
- The use of prescribed program elements to analyze program needs and a reporting mechanism to monitor progress in resolving problems;
- Annual reports, submitted in a timely manner, on program accomplishments in addition to reports on statistical changes in the agencies' work force; and
- Objectives and actions that lead to positive meaningful results.”

The above policy statements constitute EEOC's key design elements of the affirmative action planning process for the executive branch.

EEOC's instructions allow for flexibility by individual agencies to initiate activities that meet “. . . their EEO program needs . . .” and the setting of numerical goals for EEO groups. The definition for the term “EEO Groups” is: “Black males, black females, Hispanic males, Hispanic females, Asian American/Pacific Islander males, Asian American/Pacific Islander females, American Indian/Alaskan Native males, American Indian/Alaskan Native females, white males, and white females.”¹⁹

GAO's Work Force Structure

The number of persons employed by GAO between 1986 and 1990 was relatively constant from a low of 4,992 in 1986 to a high of 5,189 in 1990.²⁰ GAO work force statistics show that during these years, GAO increased the number of women and minorities in its professional staff (that is, all employees GS 7 and above) in all but one of its EEO categories. The number of women has increased by 473 to 1,661, blacks by 132 to 592, Hispanics by 50 to 167, and Asians by 46 to 134. The only decrease occurred in the “Other” category, which experienced a decline of 2, from 10 to 8.²¹

¹⁹See EEO-MD-714.

²⁰GAO History: 1921-1991 (GAO/OP-3-HP) p. 140.

²¹See GAO's 1990 Annual Report of Key Performance Indicators, p.44.

Until 1988, GAO used the same pay scale system as the executive branch, namely the General Schedule (GS) pay scale. In 1988, GAO implemented a new pay system, Pay-for-Performance (PFP). This system covers all evaluator and evaluator-related positions, as well as most attorney positions, or 72.9 percent of GAO's employees. The system operates within the same salary range as the General Schedule, but salaries are incorporated into three broad pay bands. As with the GS pay system, the higher the number, the greater the remuneration and responsibility. Band I is the entry-level pay band. It is subdivided into two parts, developmental and full performance. Band II is composed of mid-level employees, roughly equivalent to GS-13 and GS-14. Band III, the highest level within this system, is equivalent to the GS-15 level. Senior GAO officials are in the Senior Executive Service, as are their counterparts in the executive branch.

The remainder of GAO's work force is paid under the General Schedule pay system or the Wage Grade pay system used by the executive branch. Employees in the PFP system perform the bulk of GAO's programmatic mission. Employees in the other pay systems perform the majority of staff, support, and executive-level management functions.

Affirmative Action at GAO

GAO's Focus

Affirmative action plans at GAO from 1987 through 1990 focused on these three major components of the employment process:

- hiring,
- job assignments, and
- promotions.

GAO's Program

GAO created the Office of Affirmative Action Plans in 1986. In establishing the Office, GAO embraced the objective of "achieving a work force which draws fully on the available talents of women and minorities at all levels."²² To accomplish this, GAO established a system in which units set goals and timetables, as appropriate, for hiring and promoting women and minorities and a reporting requirement to ensure that job assignments were made equitably.

OAAP requests information concerning underrepresentation analyses, goal setting, and job assignment assessments. Instructions for complying with OAAP's requests are issued by the Comptroller General and/or the Assistant Comptroller General for Operations. OAAP issues directions for calculating underrepresentation, establishing goals and monitoring efforts to be undertaken regarding job roles and assignments. OAAP issues separate memoranda (referred to as calls) for entry-level and upper-level goals from each unit. Each fiscal year, the Comptroller General issues a statement to all reporting units that highlights his concerns in the area of affirmative action and stresses the importance of compliance with OAAP's instructions. Together, these documents form the hub of GAO's affirmative action plan, reaching outward to the regional offices and the headquarters offices and divisions. Responsibility for meeting program requirements rests with the top managers of these units.

GAO began using a divisional approach to affirmative action planning in 1986. GAO did not formulate a national affirmative action plan during the time frame covered by this report²³ but chose instead to focus its efforts solely on a divisional approach. GAO maintains that making those responsible for hiring and promotions accountable for establishing and achieving affirmative action objectives is effective because these managers

²²See GAO Order 0130.1.27(2).

²³GAO aggregates the number of persons employed by gender, race, and national origin for its Compendium of Indicator Statistics. These indicators are measured for percentages of women and minorities in professional positions at the staff level, the senior level and the management and executive levels.

are the closest to personnel activities, such as hiring, promotions, and job assignments and bear the responsibility for making personnel decisions.

Although this approach clearly focuses responsibility, it deprives the agency of the ability to assess its overall affirmative action requirements and does not meet the title VII requirement that agencies submit “. . . a national and regional plan . . . in order to maintain an affirmative program of equal employment opportunity”²⁴ Even absent the statutory language, a unit- by-unit approach, such as GAO’s, would be insufficient, standing alone, because it dilutes top national management responsibilities and cannot coherently account for migrations within the work force population. The lack of a national plan inhibits the agency from viewing itself as a complete entity, and it fragments the process in such a way as to make it extremely difficult to determine accurately GAO’s affirmative action needs.

GAO’s use of a unit approach does not exempt the agency from its obligation to prepare and regularly maintain a national affirmative action plan. Nor are the two approaches incompatible. Additionally, under this unit approach, GAO tolerates differing methods for calculating underrepresentation and thus cannot pull these differing calculations together to identify precisely its affirmative action stance.

GAO reporting units do their affirmative action planning on a yearly basis. A national plan coordinated by OAAAP on a regular cycle would enable the agency to establish agencywide requirements that could then be integrated into the annual unit submissions. Inasmuch as lateral reassignments and promotions from within have played a role in GAO’s affirmative action process, a national plan that would factor these movements into an overall appraisal and affirmative action planning activity would help the agency determine the effect of these movements on the agency’s EEO efforts. Under such a scheme, the agency would meet its statutory responsibility and gain a national perspective on its affirmative action standards.

²⁴Section 717, title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e(b)(1).

Calculations of Underrepresentation as a Component of Affirmative Action Planning at GAO

A fundamental activity in affirmative action planning is calculating the level of representation of various groups in the employer's work force and then comparing that level with the same group's representation in an external work force, such as the civilian labor force or other relevant labor force.

The GAO work force is divided into two major groups, evaluator and evaluator-related and GS positions, which should facilitate consistent calculations. Evaluator and evaluator-related positions constitute 73 percent of the employment opportunities at GAO. During the 1987-90 period, GAO had an entry-level standard of a bachelor's degree for such positions. Reporting officials use degrees-conferred data produced by the Department of Education as the primary benchmark in determining the relevant labor pool for evaluator and evaluator-related positions. As stated above, GAO itself has found that currently available labor market and demographic data, including degrees-conferred data, are "limited."²⁵ Even with data that were not limited, GAO's approach to this aspect of affirmative action planning would be problematical, because of varying approaches to calculating the data that the agency permits.

Although instructions from OAAP to reporting units were consistent, the Board found that the response of GAO's units was not consistent. Some offices used a weighted approach based on their past hiring experience, and others used the data without relating them to this past experience. Varying approaches were taken to include factors that had previously influenced the employment process (hiring or promotion). Units recalled their previous results for hires and promotions and then assigned a percentage weight to each result. If, for example, a unit found that 30 percent of its historical base for promotions was the lateral reassignment process, 10 percent came from new hires and 60 percent came from its internal pipeline, it would then project a proportional percentage value weight to its next promotion cycle from each source and calculate the level of representation of women and minorities from each source.

Some offices considered the percentages of entry-level personnel traditionally coming from the surrounding area, from particular colleges and universities, and from the national labor force. Offices using this approach assigned a percentage to each category and then calculated whether underrepresentation existed. Other offices used regional data solely, and yet others selected the data universe that provided the largest pool of available potential applicants. Some units included projected

²⁵See p.9.

staffing levels in determining levels of underrepresentation and others did not.

This lack of consistency in calculation impedes a complete and thorough assessment of GAO's affirmative action planning process, because given the different approaches of units, comparisons of the determinations reached are difficult to make.²⁶ Examples of these varying approaches can be found in appendix I to this report.

A few GAO units consist mostly of GS employees. As of October 1991, GAO employed 1,245 GS staff;²⁷ of these, 1,080 were employed at GAO headquarters. GAO's GS staff are employed in various job categories. More than 50 percent (796) are in grades GS-1 to GS-11, and more than 50 percent (440) of those are minority females.

As with the evaluator and evaluator-related positions, inconsistent calculations in these units are a recurring problem. GAO allows use of various comparative statistical benchmarks for GS positions depending on the job category. GAO's affirmative action plans for the years reviewed state that units whose work force is made up of mostly other than evaluator and evaluator-related positions should determine if underrepresentation exists and set goals for the relevant job series, as appropriate.

GAO should establish a consistent approach to making these underrepresentation calculations. While the Board recognizes that some measures of difference may be appropriate for headquarters offices as opposed to regional offices, it is not persuaded that differing methods of calculation, at least at the entry level, are necessary or helpful in establishing an effective affirmative action plan at GAO. The Board understands that identifying the sources for upper-level positions is more complicated, because lateral reassignments, promotions, and new hires may all be factors in determining a relevant comparative base. Nevertheless, the Board notes that consistency of approach would permit GAO greater insight into its program. Each source for upper-level positions comes into play in the employment process for varying reasons and at differing times. But without a consistent method for determining these factors and using them in the affirmative action process, GAO cannot determine precisely its affirmative action posture or measure its success.

²⁶The Board notes that EEOC requires all executive branch agencies to use the same data and the same reporting format.

²⁷This number does not include the Board's seven GS employees.

Goal Setting as a Component of Affirmative Action Planning at GAO

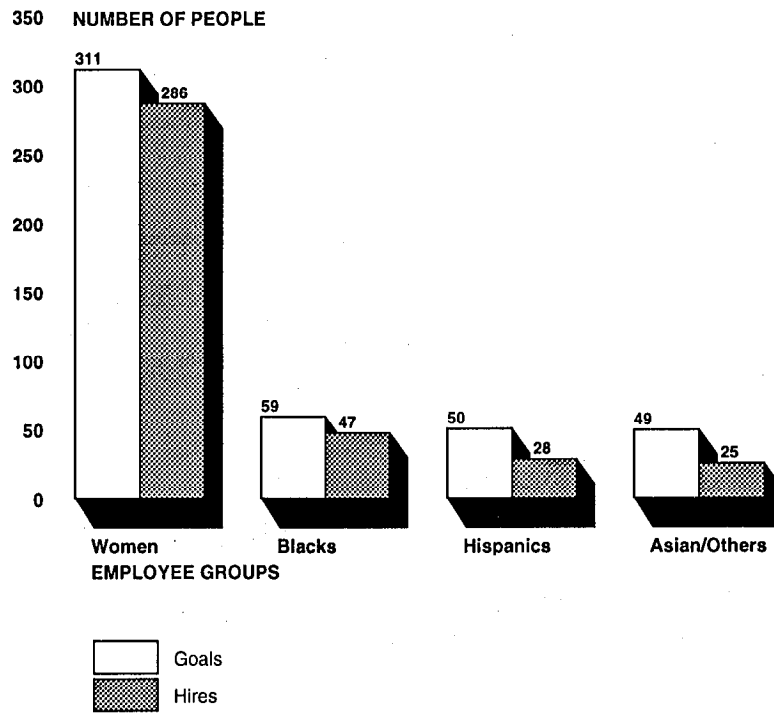
In affirmative action planning, a goal is set when a determination of underrepresentation is made. A goal represents a target for a future hiring or promotion action. GAO correctly instructs its reporting units to set goals only where underrepresentation is found. GAO's instructions also provide that if underrepresentation is found to be less than one person, the units need not set a goal. The instructions do not provide any method for determining the number of goals to be set on the basis of the amount of underrepresentation found. Further, because affirmative action planning at GAO does not differentiate between minority and nonminority men and women in determining underrepresentation, neither goal setting nor goal attainment can be calculated precisely.

Additionally, in aggregating the number of goals met, OAAP incorporates all personnel actions related to hiring and promotions that involve women and minorities and compares them with goals set, rather than aggregating and comparing only the numbers of actual goals met. See figs. 2. 1, 2.2 and 2.3.²⁸ In figure 2.1, the entry level hires bars count only those selections of women and minorities that met entry-level goals as set by all the reporting units. Where a unit did not have a goal for a particular EEO group, the hiring of an individual from that group was not counted toward goal attainment. Likewise, selections in excess of the goals set were also not counted.

This manner of presentation is in distinct contrast to OAAP's yearly tables that summarize goal achievement. (See figs. 2.2 and 2.3.) Figure 2.2 compares the goals set by GAO units with the total entry-level hiring of women and minorities. Figure 2.3 compares goals set with entry-level hires only where goals were set. These are the two approaches OAAP uses to measure, in the aggregate, whether goals set are being met. Under OAAP's approach, one cannot determine whether goals set by individual units are being met. If goals are set on a unit-by-unit basis, their attainment should be measured on this basis. The objective of unit accountability is lost when the figures are aggregated in the manner done by OAAP. Under the OAAP approach, the failure of individual units to achieve goals can be masked by a high number of entry-level hires by units that did not need to set goals or that hired women and minorities in excess of their goals.

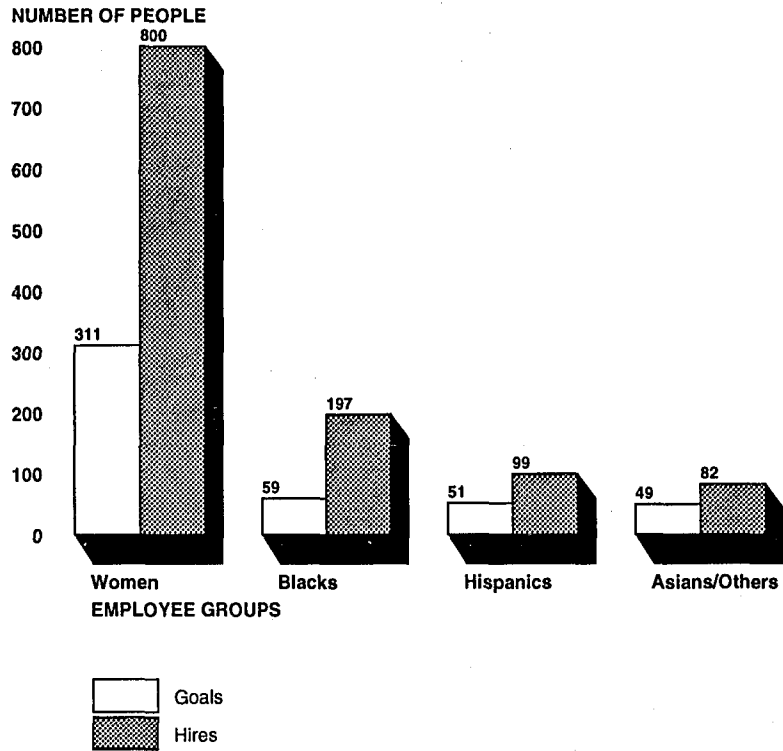
²⁸The figures are for entry-level goal setting and attainment. The approaches used by OAAP are the same for promotions. The Board chose entry-level goals and attainments as an example.

Figure 2.1: Comparison of Entry Level Hiring Goals With Entry Level Hires That Met Goals (1987-90)



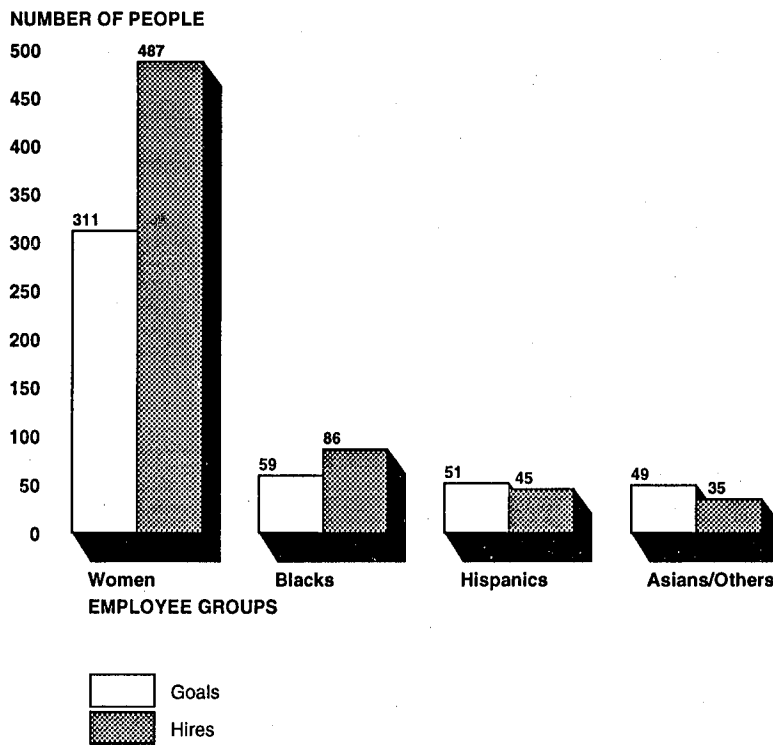
Source: OAAP Data

Figure 2.2: Comparison of Entry Level Goals With All Entry Level Hires



Source: OAAP Data

Figure 2.3: Comparison of Entry Level Goals With All Entry Level Hires- Only When Goals Established (1987-90)



Source: OAAP Data

Job Assignments as a Component of Affirmative Action Planning at GAO

GAO recognizes that an employee's assignments and/or role in an assignment is an important factor in determining promotion potential. GAO has identified the job assignment process as a potential barrier to equity in the workplace, and has incorporated the assessment of job roles and assignments into its affirmative action plan. The recognition given to this area is a key component in GAO's affirmative action plan.

GAO evaluator and evaluator-related employees are often given varying responsibilities in an assignment. One person may be designated the evaluator-in-charge; another, the assistant senior manager; and yet another, the site senior. Each designation conveys the status and role of the employee on the project. Supervisors and managers consider these responsibilities when making promotion decisions.

In fiscal year 1986, unit heads reviewed the job assignment process in their units. In fiscal year 1987, GAO identified this process as a part of its affirmative action efforts. GAO recognized that equity in this process "... can have a direct and important bearing on the prospects of the employee for promotion."²⁹

In the fiscal year 1989 plan, OAAP required that each unit set up a job assignment tracking system "... to closely monitor its distribution of assignments and roles, and to examine and correct imbalances where significant differences occur."³⁰ Subsequently, OAAP sent a memorandum to division and region heads entitled "Monitoring the Distribution of Job Roles." This memorandum set forth guidance for monitoring job roles. OAAP also provided a software package to units to assist in tracking job roles within the units, but its use was optional. The guidance did require units that found significant disparities in this area to submit a plan describing their proposals for addressing these disparities. For the purposes of this analysis, OAAP considered "... a disparity to be significant when the rate for women is less than 80% of the rate for men, or when the rate for blacks, Hispanics or Asians is less than 80% of the comparable rate for whites."

The fiscal year 1990 plan continued this process and set minimum standards for the monitoring systems. Each system was to determine the percentages of persons, by gender and race, at each level who had been assigned leadership or supervisory roles, and the units were asked to compare the results with the previous year's results.

The OAAP guidance became increasingly detailed, but the unit submissions indicate that methods used to analyze the equity of the job assignment process ranged from unit-management-level discussions to the formation of individual employee development plans to the use of the software program.

GAO should consider requiring one method for all reporting units for a period of time and then assessing the method's viability, rather than permitting the use of a variety of approaches.

The Board notes that the job assignment process is the only barrier to EEO that GAO has identified in its affirmative action planning. Training is one area not addressed as a component of the affirmative action plan. GAO

²⁹GAO Affirmative Action Plan, 1987, p.4.

³⁰GAO Affirmative Action Plan, 1989, p.4.

maintains an extensive training program. The equity of the granting of training opportunities should be analyzed to determine if any equal employment barriers exist regarding provision of training. Training is potentially critical to the equal employment opportunities of the majority of employees in the GS-1 to GS-11 grades. As previously noted,³¹ title VII provides that as one of the minimum standards of an affirmative action plan, “. . . training and education programs designed to provide a maximum opportunity for employees to advance so as to perform at their highest potential . . .” be provided by each agency.

Promotions and Upper-Level Opportunities as a Component of Affirmative Action Planning at GAO

Promotions and upper-level opportunities are another component of GAO's affirmative action plan. GAO's plan, when considering underrepresentation and goal setting, is split according to two segments of its work force: the entry-level and the upper-level. Until the PFP system was initiated, the upper-level grades were GS-13 to GS-15 and the entry-level grades were GS-12 and below. When GAO established PFP, Band I (developmental and full performance levels) became the entry-level and Bands II and III became the upper-level.

In fiscal years 1987 and 1988, the plans suggested three sources for determining the availability of women and minorities for the upper-levels. These were the number of women and minorities at lower grade levels, the number of women and minorities in the relevant recruiting areas and the potential of lateral entry from other GAO units. The OAAP 1988 guidance, however, stated that the sources for these positions “. . . sometimes include sources outside GAO.” In fiscal year 1989, the plan stated, “In seeking to meet upper level goals, divisions and regions alike should take full advantage of the potential for hiring new staff from outside GAO.” The fiscal year 1990 guidance underscored the notion of meeting upper-level goals through new hires by stating, “When the internal pipelines are not sufficient to make reasonable progress in meeting our long-term target, we must seriously consider outside hiring.”

Prior to the establishment of the bands as part of PFP promotion activity was more readily discernible for Band II employees because they then constituted the bulk of GS-13s and GS-14s. Thus, an employee's promotion from GS-13 to GS-14 was a transparent act. Upon the merger of these grades into the Band II (currently, Band II includes the largest number of employees at GAO), employee movement is most clearly visible upon a promotion to Band III.

³¹See p.8.

The PFP system highlights the need for a national affirmative action plan, especially at the Bands II and III levels. This is due to the fact that there are only 459 Band III evaluator and evaluator-related positions with an internal pipeline of 1,788 Band II evaluator and evaluator-related employees.³² Given the relatively limited opportunities at the Band III level and the comparatively large potential internal applicant pool at GAO agencywide, a national affirmative action plan would assist GAO in determining one of the main sources of availability for its highest level nonexecutive employment opportunities.

GAO's affirmative action plan does not include a component that considers the other pay benefits, such as bonuses and permanent pay increases, that are intrinsic to PFP. The inclusion of an analysis of these pay benefits would track the relative movement of women and minorities within the band system and would permit GAO to refine further its pipeline availability analysis. Such an analysis, initially at least, would not require the setting of goals for permanent pay increases and bonuses but rather the identification of barriers to such opportunities and approaches to be taken to remove any barriers found.

How GAO'S Program Fares When Reviewed Under the Executive Branch Standards.

To compare GAO's affirmative action program with that of the Executive Branch, the Board looked at GAO's program in light of the seven policy considerations presented in EEOC's management directive.³³

“Strong commitment by the Head of the Agency through a clear delegation of authority to Senior Managers”

In each year reviewed by the Board, the Comptroller General issued a statement to responsible officials expressing his commitment to attaining a diverse and representative work force at GAO. In a 1986 memorandum to division and office heads that announced the establishment of OAAP the Comptroller General stated:

“Accountability for achievement of affirmative action goals has not always been clear at GAO. While our prior plans established Office-wide goals, these goals were not often

³²These numbers reflect GAO's employment of Band II and Band III evaluators and evaluator-related personnel as of October 1991.

³³The Board recognizes that the elements stated in the EEOC's directive are not mandated for GAO as they are for executive branch agencies. But given the congressional intent to create within GAO's personnel system a similar standard, it is a fair and appropriate basis for comparison.

translated into specific objectives at the unit level. Accountability for their achievement was obscure, and their usefulness as a management tool was diminished.”

In the 1990 memorandum, the Comptroller General stated, “I truly believe that an organization’s future vitality will depend in large measure on its ability to attract and retain talented women and minorities.” Moreover, the Comptroller General has unequivocally placed responsibility for affirmative action on unit heads. This action, together with his firm statements of position, meets this touchstone.

“Management accountability systems for holding Senior Managers responsible for achieving Agency EEO objectives”

The Board posed written questions to GAO management officials concerning GAO’s approach to holding senior managers accountable for achieving EEO objectives. GAO responded that senior managers are evaluated against a number of standards, including setting affirmative action goals and achieving them to the maximum extent possible. The response also stated that the Comptroller General ensured that unit heads were aware of their responsibilities and any deficiencies in regard to all aspects of affirmative action, including achievement of hiring and promotion goals. The Comptroller General considers a manager’s affirmative action record when he makes his decisions on SES bonuses. This standard is thereby met.

“Identification and removal of barriers at all levels of the work force”

GAO has identified the job assignment process as a key factor in development of equal employment opportunities in its workplace. GAO has made the evaluation of the job assignment process an integral part of its affirmative action program and has permitted unit heads to develop various methods for assessing the equity of this process. These range from unit heads’ reviewing job assignments and looking for apparent inequities to the use of a software package disseminated by OAAP that records job assignments and job roles by EEO category. This process is geared toward the majority of GAO’s work force (evaluators and evaluator-related personnel), and to the extent that a barrier to equal employment has been identified, it fulfills this policy intent. It is noted, however, that the plans fail to specify how the barrier should be removed if it is found to exist in an individual unit. The plans reviewed by the Board did not discuss the identification and removal of any other barriers to equal employment. GAO

apparently has not sought to identify barriers to equal employment opportunity that may exist for almost 30 percent of its personnel that are not in PFP jobs. Regarding this segment of the employee population, GAO has not met this standard.

“Aggregation of the agency work force into agencywide, major operating component (MOC) wide, commandwide, regionwide, and installation program plans”

GAO aggregates its work force for purposes of affirmative action planning at the regional and headquarters unit levels. In its semiannual compendium of statistics, the data are presented on an agencywide basis. Although GAO reports on an agencywide basis, it does not aggregate its work force nationally in affirmative action planning. Further, GAO does not report its statistics broken down by the definitional categories required of executive branch agencies. GAO’s reporting requirements are limited to gender, race, and national origin, thus permitting the reporting officials to determine, for example, the category or categories in which a Hispanic woman should be placed, which could permit double counting. Rather than establishing “gender plus” categories, GAO uses only the “Women,” “Blacks,” “Hispanics,” “Asians,” “Men,” “Whites,” and “Others” categories. These groupings do not permit the agency to consider the relative position of minority women in the work force. GAO meets much of the intent of this standard. However, because it does not aggregate at the agencywide level for affirmative action planning and because of its limited EEO categories, it does not fully meet this standard.

“The use of prescribed program elements to analyze program needs and a reporting mechanism to monitor progress in resolving problems”

GAO has established program elements that generate analysis by unit heads. The elements at GAO for affirmative action planning are the hiring process, the promotion process, and the job assignment process. GAO breaks its affirmative action planning activity into two parts. Unit heads are first required to assess entry-level requirements and, if necessary, set goals for hiring at this level. This constitutes the program element for the hiring process. Subsequently, unit heads perform the same process for upper-level positions. This constitutes the program element for promotions. On an annual basis, the units describe their activities in assessing and adjusting, as necessary, the job assignment process. A year-end report is required of all reporting units. The report states the

results achieved or explains the reasons for failing to meet the unit objectives. GAO's program elements and reporting requirements satisfy this standard.

“Annual reports, submitted in a timely manner, on program accomplishments in addition to reports on statistical changes in the agencies' work force”

GAO's instructions have consistently required an annual descriptive and statistical report from reporting officials. These reports are received in a timely manner. GAO meets this standard.

“Objectives and actions that lead to positive meaningful results”

A fundamental objective of GAO's affirmative action planning is to ensure that unit managers are responsible for implementing affirmative action plans. In each year reviewed, all unit managers responsible for participation in this activity reported on their analyses and results. All units performed an underrepresentation analysis, set goals if necessary, and considered the job assignment process. All units reported on results, as required by OAAP. GAO has thereby established the interactive structure it sought when it established OAAP. The intent of this standard is thus met.

In summary, GAO's affirmative action program conforms in most aspects to the policy intentions described in EEOC's management directive. GAO's plan contains elements that fall within these broad guidelines and GAO has developed specific instructions to its managers to fulfill these objectives. The EEOC's requirements for Executive agencies do not apply to GAO and are discussed herein only as one standard of comparison.

GAO and Employee Comments

The Board submitted a draft of this report to GAO management, GAO employee councils, and the General Counsel of the Personnel Appeals Board. The majority of employee councils did comment on the report, either in writing or by telephone. Their written comments and those of GAO management appear in appendixes II through V and the PAB's General Counsel's reply appears in appendix VI. Comments received by telephone did not suggest any substantive changes to the report.

GAO management's comments submit that GAO's approach to affirmative action planning, during the years covered by this report, constitutes a "national" affirmative action plan, in that "... GAO's plan represents a composite of unit affirmative action efforts and results ...". At the outset of this study, the Board asked GAO management to respond to a series of questions concerning the operation of GAO's affirmative action plan. Several of these sought information on whether GAO's affirmative action plan analyzed and evaluated GAO's efforts on an agencywide level. Prior to responding to the specific questions in its letter to the Board, GAO management summarized its approach as follows:

"... since 1986 GAO has taken a unit-based approach to affirmative action. Under this approach, major operating units (divisions, regions, and support offices) are responsible for establishing and meeting any affirmative action goals. We strongly believe that officials responsible for making hiring and promotion decisions are the ones best held accountable for achieving progress in affirmative action (and we think the results since 1986 prove the effectiveness of our approach). Consequently, we do not have much in the way of agencywide goals or availability analyses (other than overall agency demographics and the occasional need to aggregate individual unit data)." (Emphasis in the original.)

Its comments on the draft report, however, state that "... OAAP also collects and monitors agency-wide data to assess agency-wide performance. OAAP generates a number of agency-wide reports for internal, day-to-day management ..."

This apparent inconsistency to one side, the agency's process is not a national plan but is rather a composite approach, predicated on the idea that each unit's carrying out OAAP instructions permits GAO as an agency to be capable of seeing the totality of the agency's progress and assessing areas that need improvement. While GAO uses its unit approach effectively, the approach is nonetheless limited in that certain matters are best remedied on an agencywide basis. Its basic flaw is that it fails to consider factors such as identification of institutional barriers to equal employment, national management accountability, and aggregation of the agency's work

force based on agencywide considerations. As stated above, the Board is not suggesting that GAO abandon its unit approach but rather that it strengthen its affirmative action planning process by adding a national component.

Among the employee councils' written comments were some suggestions for related future Board oversight activities. The Board will consider these suggestions in a future oversight planning cycle.

Conclusions

GAO has a statutory responsibility to formulate a national affirmative action plan. The formulation of such a plan does not necessitate elimination of its current unit approach but should serve as a guidepost to the unit plans and to highlight GAO's successes and deficiencies on an agencywide basis.

GAO should initiate analysis of the operation of the permanent pay increases and bonuses as a component of affirmative action. Such an analysis should include specific emphasis on Band II employees to help the agency determine the applicant pool for promotion to Band III. GAO's unit-by-unit approach does, however, meet the agency's objective of making unit managers responsible for affirmative action, and that feature should be retained. GAO should formulate its EEO categories more discretely in its underrepresentation analysis. GAO should develop a standardized method of calculating underrepresentation.

Having determined that job assignments and roles are an important factor in furthering equity in the workplace, GAO should require units to use one consistent approach in assessing this process so that the agency can address issues that arise in this area in a dependable and quantitative fashion. GAO should add a training component to its affirmative action planning process to meet one of the minimum standards of title VII.

Examples of How Reporting Units Calculated Underrepresentation

This appendix contains five examples of how reporting units calculated underrepresentation for affirmative action planning purposes. All five examples are from the 1989 planning cycle, and all were done for entry-level evaluators and evaluator-related positions.

Appendix I
 Examples of How Reporting Units
 Calculated Underrepresentation

UNIT A

 SUMMARY OF CAREER LADDER EVALUATORS (GS-7 THROUGH GS-12 ONLY) ON
 BOARD AS OF 9/30/88

	TOTAL BLACK -----	TOTAL HISPANICS -----	TOTAL ASIAN -----	TOTAL OTHER -----	TOTAL FEMALE -----	TOTAL ALL -----
ACTUAL NUMBER	7.00	12.00	2.00	0.00	25.00	52.00
DERIVED PERCENT	13.46%	23.08%	3.85%	0.00%	48.08%	100.00%

 WEIGHTED TARGET PROFILE (8 NATIONAL SCHOOLS = 70% AND U.S. RELEVANT
 WORKFORCE = 30%)

	TOTAL BLACK -----	TOTAL HISPANICS -----	TOTAL ASIAN -----	TOTAL OTHER -----	TOTAL FEMALE -----	TOTAL ALL -----
DERIVED NUMBER	1.50	4.48	0.98	0.25	21.56	52.00
ACTUAL PERCENT	2.88%	8.61%	0.86%	0.48%	41.47%	100.00%

UNDERRE- PRESENTED NUMBER (-)	5.50	7.52	1.00	-0.25	3.44	
UNIT GOALS	0	0	0	0	0	

 FOOTNOTES:
 -- PERCENTAGES FOR ASIAN AND OTHER BASED ONLY ON SCHOOL DATA
 RELEVANT WORKFORCE DATA NOT AVAILABLE
 -- UNDERREPRESENTATION PRESENT WHEN ACTUAL UNIT A PROFILE NUMBER IS
 LESS THAN TARGET PROFILE NUMBER

Appendix I
 Examples of How Reporting Units
 Calculated Underrepresentation

UNIT B
Career-Level Evaluator and Evaluator Related Staff¹
Deviations from Degrees Conferred Availability

	<u>White</u>	<u>Black</u>	<u>Asian</u>	<u>American Indian</u>	<u>Hispanic</u>	<u>Men</u>	<u>Women</u>
Degrees conf. availability (percent- ages)	77.1%	5.4%	10.6%	1.3%	5.6%	50.1%	49.9%
Degrees conf. targets (persons)	49.3	3.5	6.8	0.8	3.6	32.1	31.9
Career-Level utilization (persons)	<u>46.0</u>	<u>4.0</u>	<u>7.0</u>	<u>0.0</u>	<u>7.0</u>	<u>31.0</u>	<u>33.0</u>
Deviations (persons)	-3.3	0.5	0.2	-0.8	3.4	-1.1	1.1

¹ Staff profile projected to start of FY 1989 (10/9/88). Unit B's evaluator and evaluator-related staff include GAO evaluators (347 series), the Technical Assistance Group (334, 1515, 1412, and 301 series), and the writer-editors (301 series).

Appendix I
 Examples of How Reporting Units
 Calculated Underrepresentation

UNIT C

<u>Current Level</u>	<u>No.</u>	<u>Dept. of Ed. Statistics</u>	<u>Projected Staffing Level</u>	<u>Difference between current and projected level (i.e., an increase of 20 staff)</u>	
Female	52.9	37	44.4 X 90 =	40	- 3
Black	20.0	14	5.9 X 90 =	5	+ 9 (overage)
Hispanic	10.0	7	2.4 X 90 =	2	+ 5 (overage)
Asian	5.7	4	5.1 X 90 =	5	- 1

Appendix I
 Examples of How Reporting Units
 Calculated Underrepresentation

UNIT D

	<u>Career-Level Profile (1)</u>		<u>Percentage of Under-utilization</u>	
	<u>Number</u>	<u>Percent</u>	<u>Area (2) Graduates</u>	
Male	37	53%	54%	N/A
Female	33	47%	46%	0
Total	70	100%	100%	
White	52	74%	82%	N/A
Black	11	16%	11%	0
Hispanic	6	9%	5%	0
Asian/PI	1	1%	2%	1%
Other (3)	0	0%	0% (4)	0
Total	70	100%	100%	

-
- (1) Consists of all evaluators in grades GS-7 through GS-12
 - (2) Benchmark for determining underutilization
 - (3) Includes American Indians and minority groups not otherwise represented
 - (4) Not zero but less than 1 percent

Appendix I
 Examples of How Reporting Units
 Calculated Underrepresentation

UNIT E

Availability Profile

Our availability profile is based on hiring trends, Department of Education statistics on Masters degrees conferred in 1984-1985, and the composition of GAO's career ladder staff.¹ The following availability data are based on these statistics.

TABLE 1. AVAILABILITY PROFILE

	Weight Factor	Black	Hispanic	Asian/ Other	Women
NEW HIRES	.71	3.5	1.7	2.3	35.7
TRANSFERS	.29	<u>4.1</u>	<u>1.7</u>	<u>1.4</u>	<u>14.3</u>
Total		<u>7.6</u>	<u>3.4</u>	<u>3.7</u>	<u>50.0</u>

The comparison of the weighted availability profile to Unit E's career ladder profile as shown in table 2 identifies the underrepresented groups. The analysis shows that the percentages of Blacks and women staff members in Unit E's career ladder exceeds the availability percentages by about 19 percent and 12 percent, respectively. On the other hand, the percentages of Asian/other and hispanic staff members are below the profile percentages. This analysis shows that Unit E should increase the number of Asian/other and hispanic staff members in the career ladder.

TABLE 2: UNIT E'S 1988 CAREER-LADDER STAFF PROFILE COMPARED TO AVAILABILITY PROFILE

	Black	Hispanic	Asian/ Other	Women
UNIT PROFILE	26.2%	3%	2%	62%
AVAILABILITY PROFILE	7.6%	3.4%	3.7%	50.0%
DIFFERENCE	+18.6%	-.4%	-1.7%	+12%

¹ The Board notes that OAAP advised Unit E that a masters degree was not the appropriate entry-level requirement and therefore not a good measure for availability.

Comments From the Career Level Council



United States
General Accounting Office
Washington, D.C. 20548

Career Level Council


October 1, 1992

Ms. Karen Danart
Director, EEO Oversight
Personnel Appeals Board
U.S. General Accounting Office
441 G. Street, NW
Union Plaza II, Suite 830
Washington, DC 20548

Dear Ms. Danart:

The Career Level Council supports the conclusions and recommendations of the Personnel Appeals Board's "EEO Oversight Report on GAO's Affirmative Action Planning Process." In particular, we strongly support the concepts of identifying EEO groups more discreetly using "gender plus" categories; developing standardized methods for calculating underrepresentation and setting priorities for affirmative action goals; and adding the Pay for Performance system to the affirmative action process. In addition, we generally concur with your recommendation that GAO develop and implement a national affirmative action plan which will allow GAO to better assess the successes or deficiencies of its affirmative action program. However, we believe that such a plan should still provide for some flexibility to allow unit managers to tailor their plans to special unit-specific circumstances which may exist.

Sincerely,



Nancy D. Wagner
Chair, Career Level Council

Comments From the Mid-Level Employee Council

GAO

United States
General Accounting Office

Memorandum

Date: October 2, 1992

To: Director, EEO Oversight, PAB - Karen Danart

From: Mid-Level Employee Council - *L. W. Thompson*
- Shirley Hendley

Subject: Comments on PAB Report on GAO's Affirmative Action Plan

Thank you for the opportunity to comment on this report.

The report was well prepared and thorough. We agree with the report's conclusions, but we believe that the recommendations would be strengthened if the PAB incorporates the following comments.

The report recommends that GAO develop a standardized method for calculating underrepresentation and setting priorities for affirmative action goals. Most units use data on both bachelors and masters degrees conferred when establishing benchmarks for their affirmative action plans. We believe the PAB should further recommend that the units use only bachelors degrees to develop benchmarks, because the minimum requirement for an entry level evaluator position is a bachelors degree.

The report refers to an affirmative action plan for non-evaluators. The PAB should consider recommending that an upward mobility program be established for this group because a significant number are minorities and women in relatively low paying jobs with little opportunity for advancement.

The report also states that the Comptroller General considers a manager's affirmative action record when he makes his decisions on SES bonuses. To confirm this, the PAB should consider analyzing the results of the assessment process (promotions, bonuses, and awards) in the units of SESers who receive bonuses.



**Appendix III
Comments From the Mid-Level Employee
Council**

In addition, the report states that GAO should initiate an analysis of the operation of the permanent pay increases and bonuses as a component of its affirmative action plan, with specific emphasis on Band II employees. The PAB should also consider recommending that GAO analyze and monitor the effect of Band III upper level hiring on the internal applicant pool of Band II minorities and women.

Comments From the Asian American Liaison Group

October 20, 1992

Director, EEO Oversight
Personnel Appeals Board
U.S. General Accounting Office
441 G Street NW
Union Plaza II, Suite 830
Washington, DC 20548

Dear Ms. Danart,

Thank you for the opportunity to review and comment on your report entitled "EEO Oversight Report on GAO's Affirmative Action Planning Process." The Asian American Liaison Group has no problems with your findings and conclusions. If you have any questions, please don't hesitate to call me at 206:287-4855.

Sincerely,



Stephen J. Jue,
Chairperson, Asian American Liaison Group

Comments From the Deputy Assistant Comptroller General for Human Resources



Assistant Comptroller General
of the United States

Washington, D.C. 20548

October 7, 1992

Ms. Karen Danart
Director, EEO Oversight
GAO Personnel Appeals Board

Dear Ms. Danart:

We appreciate the opportunity to comment on the Personnel Appeals Board's draft report, entitled "EEO Oversight Report on GAO's Affirmative Action Planning Process". We were pleased with the report's general conclusion that GAO continues to demonstrate a commitment to affirmative action.

We generally agree with the recommendations presented in the PAB report. Several of the recommendations are similar to our current practice and closely track changes which we have implemented during the past two years (but not reflected in the PAB study which covered the period 1987-1990). The one area of potential disagreement involves the report's interpretation of the requirement for a "national" plan.

Before detailing our planned actions in response to the recommendations, I would like to emphasize the considerable progress GAO has made in achieving a more representative workforce. Your report cites some statistics showing significant overall increases for women and minorities for the period 1986-1990. This progress continues, at all levels within the organization. For example, over the past four years, at senior and management levels, the number of women increased more than 76 percent, while those of Blacks, Hispanics and Asians increased by 50 percent, 95 percent and 87 percent, respectively. Strong management commitment and an effective affirmative action program account for these impressive results. It is a record we are proud of and one that compares very favorably with advances made elsewhere in government.

National Plan

As we discussed during our meeting in June, we remain somewhat confused about the recommendation that GAO formulate a "national" affirmative action plan. As is, GAO's plan represents a composite of unit affirmative action efforts and results which, in our opinion, comprise

Appendix V
Comments From the Deputy Assistant
Comptroller General for Human Resources

a national plan. Based on our understanding of EEOC guidance, we think our approach is consistent with the regulatory requirements which EEOC prescribes for the executive branch.

We do not fully understand why you believe that we are not now in a position to assess our agency-wide progress. In addition to monitoring unit data, OAAP also collects and monitors agency-wide data to assess agency-wide performance. OAAP generates a number of agency-wide reports for internal, day-to-day management and this information is regularly shared with employee councils and other groups. Furthermore, agency-wide demographic and affirmative action data are published in the Indicators Reports, GAO's primary management information vehicle.

We feel strongly that the progress GAO has made in improving its minority and female profile is largely due to the agency's decentralized structure for affirmative action planning. Our approach has proven effective because we hold those who actually assign work and do the hiring and promoting accountable for affirmative action. We would therefore be very reluctant to tamper with a formula that has brought us much success. In that regard, we are glad that the report clearly states that you are not asking us to abandon our unit approach, but rather to add something else, which you call a "national" plan.

To accommodate your concerns, we will add a section to the fiscal year 1993 affirmative action plan which addresses representation agency-wide and focuses attention on agency-wide progress and shortfalls.

Gender Plus

The report suggests that using "gender plus" categories would enable GAO to conduct a more meaningful representation analysis. We will begin using the "gender plus" format for monitoring workforce representation and overall affirmative action planning on an agency-wide basis. However, at this time we do not intend to use "gender plus" when setting goals. As you know, GAO's goals are unit-based, which means that for many units the numbers of goals are quite small. We do not think it would be practical or particularly helpful to distinguish minorities according to gender when establishing goals.

Standard Method for Calculating Underrepresentation

GAO has made a number of significant changes to its affirmative action program since the timeframe used in the Board's review (1987 - 1990). In fiscal year 1991, we

Appendix V
Comments From the Deputy Assistant
Comptroller General for Human Resources

adopted a uniform method of calculating under-representation and provided additional guidance on setting priorities for affirmative action goals. All headquarters divisions now use national degrees-conferred benchmark data to compute under-representation. Regional offices use localized benchmarks. OAAP consults with the large staff offices which use different hiring and promotion strategies to determine appropriate benchmarks. Although OAAP guidance provides for a uniform approach to calculating under-representation, in some limited circumstances, the OAAP Director may approve a modified approach when hiring practices in a particular unit warrant.

Pay-for-Performance (PFP)

The introduction of PFP in GAO was a major undertaking. Given the project's importance, analysis of PFP results has been conducted by staff in my immediate office, and not in OAAP. The analysis has been quite extensive and has included a comparison of PFP results for minorities and women. Since implementing the PFP system in 1989, we have introduced several systemic changes--some of which were intended to address potential barriers to equal employment opportunity.

In addition to monitoring bonuses, the PFP analysis has also included permanent pay, so that we can track the relative movement of women and minorities within the pay bands. We will revise our affirmative action plan to reflect our intent to continue these analyses.

Assignment of Roles and Responsibilities

The report concludes that GAO permits reporting units to use different approaches to assess equity in the assignment of roles and responsibilities. We agree that more uniformity in the assessment of job roles and responsibilities would be helpful. For the upcoming year, the Director, OAAP will provide more specific guidance to units concerning the content and format of these assessments. Complete uniformity, however, is probably not realistic. Roles (titles) vary among GAO divisions and regional offices; and intangibles play a large part in determining what is a "good" job or "good" role. We also expect GAO's involvement with "Total Quality Management (TQM) principles to introduce even greater variation in unit staffing.

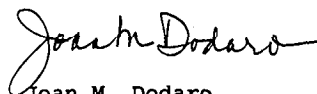
Appendix V
Comments From the Deputy Assistant
Comptroller General for Human Resources

Training

GAO has always offered extensive training to its staff. The Training Institute curriculum includes a number of required courses, as well as many recommended and elective offerings. OAAP is currently working with the Training Institute to modify our database so that we can regularly monitor training data by EEO category. As recommended by your report, we will also add a training component to the Fiscal Year 1993 Affirmative Action Plan.

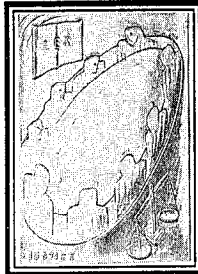
Again, we appreciate the opportunity to provide comments on the Board's draft report. We are quite proud of the agency's affirmative action program and want to assure the Board that GAO remains committed to managing a model program. If you have any questions about our comments on the report, please call me at (202) 275-4350.

Sincerely,



Joan M. Dodaro
Deputy Assistant Comptroller General
for Human Resources

Letter From the PAB General Counsel



Personnel
Appeals
Board

PERSONNEL APPEALS BOARD
U.S. GENERAL ACCOUNTING OFFICE

'92 OCT -6 P4:54

October 6, 1992

Office of General Counsel
General Counsel

Karen Danart
Director, EEO Oversight
Personnel Appeals Board
General Accounting Office
Union Center Plaza II, Suite 830
Washington, D.C. 20548

RE: EEO Oversight Report
GAO's Affirmative Action Planning Process

Dear Ms. Danart:

This letter is to advise you that upon review of the EEO Oversight Report on GAO's Affirmative Action Planning Process, the Office of the General Counsel does not have any comments on the report for your consideration.

Yours truly,

Jessie James, Jr.
General Counsel



