

FOLLOW-UP REPORT

**EEO Oversight Study of
GAO's Employment of
Persons with Disabilities**

January 24, 1994



Personnel

Appeals

Board

Office of the Chair

The Honorable Charles A. Bowsher
Comptroller General
United States General Accounting Office
Room 7000A
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Bowsher:

In 1990, pursuant to its statutory mandate to oversee equal employment opportunity at the General Accounting Office, the Personnel Appeals Board issued a report entitled EEO Oversight Study of GAO's Employment of Persons with Disabilities. In that report, the Board made specific recommendations that were intended to spur the development of a viable and effective program for employees with disabilities.

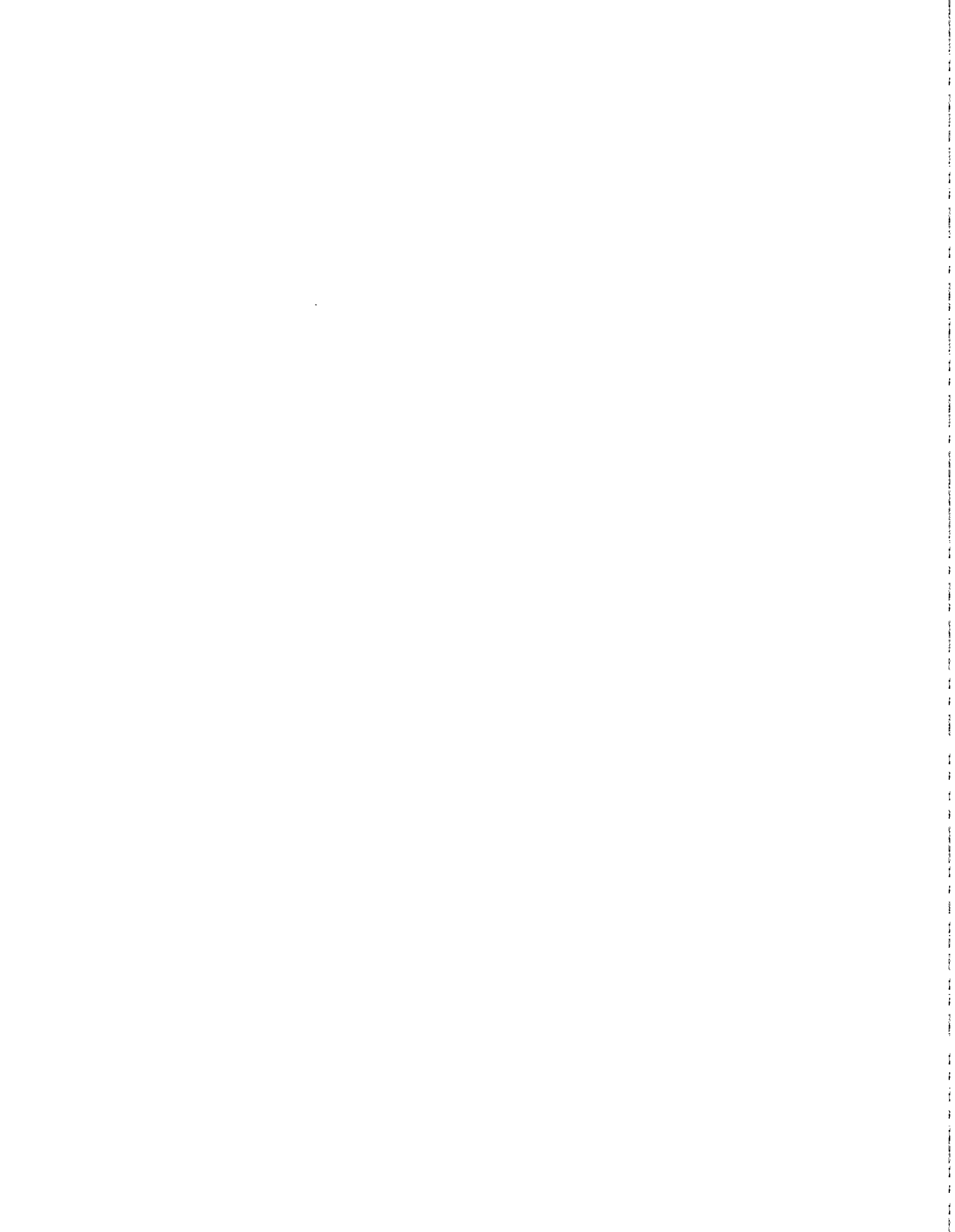
Recently, the Board conducted the attached follow-up study to determine whether and to what extent GAO had implemented the Board's recommendations. We are pleased to report that since the publication of the 1990 report, the agency has made significant progress in its efforts to ensure that persons with disabilities are afforded equal employment opportunities. It is clear that the agency took the Board's recommendations seriously and, in doing so, has formulated a cohesive program designed to address many of the vital concerns and needs of employees and applicants with disabilities.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alan S. Rosenthal".

Alan S. Rosenthal
Chair

Attachment



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Abbreviations

ACG	Assistant Comptroller General
ACPD	Advisory Council for Persons with Disabilities
CRO	Civil Rights Office
EEO	equal employment opportunity
FM	Facilities Management
GAO	General Accounting Office
GS&C	General Services and Controller
OAAP	Office of Affirmative Action Plans
OR	Office of Recruitment
PAB	Personnel Appeals Board
PERS	Office of Personnel
SES	Senior Executive Service
TDD	telephone devices for the deaf
TI	Training Institute

Introduction

In September 1990, the Personnel Appeals Board of the U.S. General Accounting Office (the Board) issued an oversight report entitled EEO Oversight Study of GAO's Employment of Persons with Disabilities, assessing GAO's employment policies and practices with respect to persons with disabilities. The study was undertaken pursuant to the GAO Personnel Act of 1980, 31 U.S.C. §732(f)(2)(A), which authorizes the Board to oversee equal employment opportunity at the General Accounting Office. The report covered a variety of issues including the accessibility of the General Accounting Office's buildings, facilities, and services; reasonable accommodations in the GAO workplace; supervisory training relating to employment of people with disabilities; hiring and recruiting practices; and affirmative action. The report's conclusions and recommendations were based on questionnaires sent to GAO employees who had identified themselves as disabled, analyses of GAO employment records and data, reports from regional managers, and an evaluation of the headquarters building's accessibility conducted by the Architectural and Transportation Barriers Compliance Board. Additionally, profile data relating to GAO's employment of persons with disabilities were compared with data from selected executive branch agencies and interviews were conducted with officials and employees in the Office of Affirmative Action Plans (OAAP), the Civil Rights Office (CRO), the Office of Recruitment (OR), the Training Institute (TI), Facilities Management (FM), and the Office of Personnel. On the basis of the data and the information collected, the Personnel Appeals Board made 12 specific recommendations to GAO intended to spur the development of a viable and effective program for employees with disabilities.

Recently, the Board decided to conduct a follow-up study to determine whether and to what extent GAO had implemented the 1990 recommendations. Specifically, and in brief, the recommendations called for:

- the establishment of a high-level position of Disabled Persons Coordinator with the standing to coordinate agency activities and the authority to direct and implement an agencywide program for employees with disabilities;
- an evaluation of the division of responsibilities among the Civil Rights Office, Office of Affirmative Action Plans, and Office of Recruitment;
- developing, approving and implementing an affirmative action plan for persons with disabilities;

- implementing a data system to evaluate recruitment, hiring, placement, advancement, training, awards, and student programs and establishment of a data base to track reasonable accommodation requests and results;
- publicizing GAO programs geared toward employees with disabilities and developing a handbook describing GAO resources and services available to employees with disabilities;
- educating and training managers and supervisors of persons with disabilities;
- requiring annual attendance at training programs, symposia, exhibits and conferences for those who carry out GAO's programs;
- integrating management accountability systems;
- setting up permanent TDDs (telephone devices for the deaf);
- reactivating the Buildings Access Committee;
- continued improvement of OR's affirmative action outreach efforts; and
- updating GAO orders that have provisions concerning employees with disabilities.

In 1990, as the report was being prepared, GAO began to implement several of the recommendations and has since adopted nearly all of them.

Background

The General Accounting Office first established a Handicap Employment Program in 1972, which was managed by a part-time Coordinator in the Office of Personnel whose job it was to increase recruitment and hiring of persons with disabilities. By 1984, the Civil Rights Office had collected data on GAO's employment of persons with disabilities and had developed an affirmative action plan for them. Shortly thereafter, the responsibility for developing affirmative action plans for minorities and women was transferred from the CRO to the newly-created Office of Affirmative Action Plans. The 1985 affirmative action plan for people with disabilities was the last such plan developed by the Civil Rights Office.

A full-time Handicap Program Manager in the CRO was added to the program in 1985. The Coordinator in Personnel continued to handle recruitment and special hiring authority cases; the Program Manager was charged with advising agency management on policies and procedures affecting employees and applicants with disabilities and for developing an affirmative action plan.

In 1988, the responsibility for developing a new plan shifted to OAAP but it was not until 1991 that that office prepared a revised affirmative action plan for persons with disabilities.

In its 1990 report, the Board concluded that GAO's program to address the concerns of and issues affecting disabled employees was ineffective because it was so fragmented and a lack of monitoring and accountability perpetuated the limitations inherent in the overall program. The Board's specific recommendations were designed to foster the implementation of a viable, agencywide program committed to affording equal employment opportunities to persons with disabilities. To determine whether the agency had implemented the 1990 recommendations, Board staff inquired of the Deputy Assistant Comptroller General for Human Resources and the employee councils, including the Advisory Council for Persons with Disabilities (ACPD). In addition, staff addressed ACPD's annual meeting to solicit comments from participants about the agency's progress, or lack of progress, in the area and met with the ACPD Chair and Vice-Chair to review each recommendation. GAO's orders, GAO's affirmative action plan for persons with disabilities, and employment data relating to hires, promotions, and separations of persons with disabilities were reviewed. The Board's specific recommendations follow with the agency's compliance noted after each.

PAB Recommendations and GAO Responses to Them

Establish a high-level position of Disabled Persons Coordinator to achieve what should be GAO's goals. The Coordinator must have the standing necessary to coordinate activities handled by the three key offices (CRO, OAAP, and OR) and, to a lesser degree, PERS, TI, and FM). In addition, the Coordinator must be able to work with supervisors nationwide to increase hiring of disabled persons and to coordinate activities among and provide information and advice to disabled persons coordinators in the regional offices. The Coordinator must be authorized to control, direct, and implement the GAO program and have adequate resources to carry out an effective program.

The agency has not specifically adopted this recommendation and has consistently taken the position that a single, high-level person is unnecessary because a coordination mechanism for GAO's human resource programs exists and has proven effective. It is also the position of the Advisory Council for Persons with Disabilities that there is no need for such a position and that it would create an unnecessary level of bureaucracy. ACPD supports the current structure in which a full-time Persons With Disabilities Program Manager in the Office of Affirmative Action Plans is charged with focusing attention on issues affecting GAO's employees with disabilities.¹

In making this recommendation, the Board intended that GAO coordinate, on an agencywide basis, its activities relating to employees with disabilities, particularly in the areas of hiring and information dissemination. The agency has complied with the spirit of this recommendation by vesting the Assistant Comptroller General for Operations (ACG/Operations) and the Deputy Assistant Comptroller General for Operations with programmatic and oversight responsibility and by creating the aforementioned position of Persons With Disabilities Program Manager in the Office of Affirmative Action Plans. These actions appear to have achieved the desired result of implementation of a viable agencywide program that focuses the resources of the agency, establishes accountability, and provides for monitoring in a number of areas.

Re-evaluate the division of responsibilities among three offices (CRO, OAAP, OR) to ascertain whether the present system is the most effective means to serve disabled applicants and employees and to

¹In January 1994, as this report was being printed, the Comptroller General announced that the Office of Affirmative Action Plans had merged with the Civil Rights Office. The CRO Director will assume responsibility for developing affirmative action plans and managing GAO's program for persons with disabilities.

improve GAO's image as a "model" employer of the disabled. Input should be obtained from the three key offices, employee councils, disabled employees, and regional coordinators. If necessary, outside resources (for example, people familiar with effective executive branch disabled persons programs) should be consulted. If GAO decides to retain its present structure, mechanisms must be established to improve coordination of efforts and to keep top management advised of progress made.

The General Accounting Office decided to retain a structure in which the Office of Affirmative Action Plans, the Civil Rights Office, and the Office of Recruitment share responsibilities, but in accordance with the Board's recommendation, has re-evaluated the programmatic duties of the Offices. After that second look, the agency issued GAO Order 2306.1, Employment of Persons With Disabilities, which addressed the division of responsibilities among all offices having responsibilities affecting the employment of persons with disabilities. The Advisory Council has no problem with the present structure and notes that the only issue left unresolved by the order is the determination of which office is to be the contact point for accommodation requests.

Develop, approve, and implement, within 60 days after this report is issued, an affirmative action plan for disabled persons. GAO has been without an affirmative action plan for disabled persons since 1985.

In July 1991, the Comptroller General issued an affirmative action plan for persons with disabilities; the plan was revised in November, 1992. The plan includes components that address recruiting, placement and advancement, accessibility to facilities, reasonable accommodations, and training for supervisors and managers.

Although the Office of Affirmative Action Plans sought the Advisory Council's input in developing the plan and incorporated many of the Council's suggestions, the Council remains concerned that the plan offers neither defined criteria for evaluating the success of the plan nor firm time frames for making such evaluations. For example, the plan requires managers, in consultation with affected employees, to meet the developmental needs of employees with disabilities, including the possible implementation of individual development plans. The plan, however, fails to specify criteria for determining who is eligible for such plans, what the criteria are for designing them, and who is to implement them.

The plan does provide for monitoring the hiring, placement, and advancement of employees with severe disabilities but fails to include standards for the evaluations or time frames for the frequency. Hiring goals or targets for persons with disabilities are also not included in the plan.

Implement a data system to conduct meaningful program evaluation on recruitment, hiring, placement, advancement, training, awards, student programs, and other opportunities. Periodic efforts should be undertaken to keep the data base up to date, including educating all employees about the purpose of the self-identification. As employees may become disabled once on the job, it is necessary to gear education programs to incumbents so they remain aware of their right to submit revised self-identification forms. A system to do this should be developed and instituted. The Board also recommends that a data base be kept of reasonable accommodation requests and results to ensure fair and equitable handling of requests and to help publicize what is available to disabled individuals.

The Office of Recruitment maintains a database to monitor recruitment activities, new hires and student interns who identify themselves as disabled. GAO's official database is kept by the National Finance Center. The Assistant Comptroller General for Operations and the Office of Affirmative Action Plans review and analyze data from the Center in order to monitor the agency's employment trends for employees with disabilities. The ACG/Operations also monitors bonus results for employees with disabilities.

Staff from ACG/Operations and the Advisory Council for People with Disabilities are updating GAO's form 154 (Self-Identification of Medical Disability). The agency sees no need to establish a database to track reasonable accommodation requests and cites a concern that employees may not feel free to make requests if they know that they are being monitored centrally. The ACPD agrees with the Board that a database for such requests should be established and maintained. The Council rejects the notion that tracking such requests would have a chilling effect and the Board notes that employee interest in acquiring whatever assistance is necessary to perform their jobs well overrides other concerns. Not only does the ACPD believe that such data should be collected but further suggests that such data be broken down into a "high tech/low tech"

standard to describe and record more accurately the nature of the requests.

Begin to publicize GAO's disabled persons program to all employees, applicants, and supervisors. Beginning with the new employee orientation training, GAO should provide information on various resources and procedures to obtain assistance and advice on reasonable accommodation, GAO-sponsored activities, and related issues. A handbook of GAO resources and services should be developed and be available to all employees so that individuals who become disabled once on the job will know where to go for information.

The agency has fully complied with this recommendation and, since the publication of the Board's 1990 report, has assiduously promoted its programs and policies for people with disabilities. The agency has sponsored numerous programs and events intended to disseminate information about the agency's policies and practices, to commemorate National Disability Employment Awareness Month, and to educate staff about the Americans with Disabilities Act. The ACDP and OAAF published a handbook in November 1993, entitled Employee Handbook: Services for GAO Employees with Disabilities, that describes GAO resources and services available to employees with disabilities.

Before the agency committed to publicizing GAO programs, the agency's history in this area was abysmal. In 1989, for example, the agency commemorated National Disability Employment Awareness Month by distributing a poster issued by the President's Committee on Employment of People with Disabilities. In contrast, in 1992, the agency sponsored a program to mark Disability Awareness Month with former Veterans Administration head, Max Cleland, featured as keynote speaker and a special exhibit of computer applications to assist persons with disabilities. In 1993, the agency marked National Disability Employment Awareness Month with a keynote speaker; two brown-bag luncheons; and a month-long display highlighting new technology designed to meet the needs of persons with disabilities, building accessibility, and agency emergency plans. Both annual programs also featured the agency's field staff participating in a wide range of activities designed to highlight the workplace contributions and accomplishments of disabled individuals.

Educate supervisors about what is expected of GAO, them, and their units regarding the disabled persons program. Long-time, as well as

new, supervisors should be required to undergo training. Pay for Performance data should be monitored to ensure the removal of any attitudinal barriers in processing or granting awards.

Although attendance at training programs and symposia for managers and supervisors of people with disabilities is not required, staff in offices that administer GAO programs affecting persons with disabilities have attended workshops, conferences, and symposia. In addition, information about the rights of employees with disabilities has been incorporated in the "EEO Workshop," the "Skills and Strategies for Supervisors" course, and the "Workplace Relations and Communications" course. Recently, the Training Institute offered a course designed to make managers and supervisors aware of technology and managerial flexibility techniques that are available to accommodate disabled employees.

Require all GAO employees involved in carrying out the GAO program to attend yearly training, symposiums, exhibits, and conferences offered by executive branch agencies, the President's Committee on Employment of People with Disabilities, the General Services Administration's Information Resources Management Service Clearinghouse on Computer Accommodation, and other disabled persons organizations to keep abreast of new developments, recruitment sources, program concerns, assistive devices, etc.

Early in 1993, the Training Institute began offering a course about persons with disabilities as part of its "Human Resources Management" series for managers and executives. The ACPD monitored the initial presentation of the workshop and is working with Training Institute staff to refine subsequent course offerings.

In addition, staff responsible for administering GAO programs and setting policy that affect employees with disabilities have attended workshops, symposia and conferences offered by the President's Committee on Employment of People with Disabilities.

Integrate a system of internal management accountability and oversight of GAO efforts into the new program.

GAO has designated a single office (ACG/Operations) to ensure that all GAO policies affecting persons with disabilities are implemented. The agency has also integrated responsibility for implementing agency policy affecting persons with disabilities into individual Senior Executive Service (SES)

contracts and in supervisory standards and evaluations so that managers and supervisors can be held accountable for their performance in this area.

Set up permanent TDDs in such offices as OR, OAAP, and CRO. List the phone numbers in the GAO Telephone Directory and in recruitment and other literature and publications. The directory should also list a Disabled Persons Program Coordinator.

The Office of Information Management and Communications worked with ACPD to allocate telephone devices for the deaf (TDD's) to GAO regional and headquarters offices. In addition, five portable TDD's have been allocated for use by GAO staff. The ACPD believes that all GAO staff who are hearing and/or speech impaired have access to TDDs.

Reactivate the Buildings Access Committee to complete the task it started. GAO needs to commit to a programmatic as well as a technical approach to accessibility issues. High-level oversight of the Committee's work should be in place. The Committee's efforts should be directed to regional offices, as well as headquarters. The Committee also should review GAO evacuation procedures to ensure they adequately meet the needs of disabled employees and visitors to GAO buildings.

The agency elected not to reactivate the ad hoc Buildings Access Committee and, instead, assigned responsibility for building access issues to General Services and Controller which has a Design Review Committee to ensure that all modernization activities conform to federal statutes and standards. The ACPD established a Committee on Headquarters Building Accessibility that works closely with the agency's representatives to ensure that existing architectural barriers are identified and corrected and that proposals for modifications contain no barriers for those with disabilities.

Since the Board's 1990 report, the agency has improved the sidewalks and curb cuts surrounding the headquarters building, installed a wheelchair lift in the auditorium, and made interior space accessible as it was being remodeled. Several offices are located away from the main building, however, and many employees depend on the shuttle service to travel from building to building. The shuttle service is not accessible to employees who have certain mobility impairments or use wheelchairs. The agency claims never to have had a request for transportation from a

mobility-impaired employee but will make necessary arrangements upon request.

The ACPD is satisfied that its monitoring and constant testing of facilities by employees in the headquarters building is sufficient to ensure that accessibility remains an agency priority but is concerned about the inaccessibility of the shuttle service.

Also, since publication of the 1990 report, the Personnel Appeals Board has relocated to an accessible site.

Continue to improve OR's affirmative action outreach efforts. In particular, a system should be in place to monitor whether the recruiters are carrying out the mandated affirmative outreach efforts by regularly contacting disabled persons and special emphasis organizations.

The agency is operating under a virtual hiring freeze that precludes most recruiting. In 1992, however, offers were made to nine percent of the applicants with disabilities compared with 3.4 percent of the applicants reporting no disabilities. Due to the hiring freeze, the Advisory Council has not established a committee on recruiting but plans to do so as soon as the agency is free to begin actively recruiting.

Update, on an expedited basis, the woefully outdated, and thus useless, GAO orders that have provisions concerning disabled employees. The 1980 selective placement order and the 1986 orders setting forth the responsibilities of CRO and OAAP are inaccurate. New orders have not been issued to reflect the 1988 transfer of responsibility for the disabled persons affirmative action plan from CRO to OAAP. Although OR was created in May 1988, the order establishing its mission and function was not issued until December 1989. No order exists for TI, which, like OR, was created in May 1988. New orders should be issued for currently functioning offices. All needed input should be obtained in the effort to revise the selective placement order.

On January 17, 1992, the agency issued GAO Order 2306.1, "Employment of Persons with Disabilities," which superseded an October 1, 1980, order. The revised order defines the responsibilities of the agency and sets forth the duties of all the various offices charged with implementing the policies affecting the employment of persons with disabilities.

**Chapter 3
PAB Recommendations and GAO Responses
to Them**

Under the revised order, the CRO is charged with processing and mediating complaints alleging discrimination on the basis of disability and the Office of Affirmative Action Plans collects and monitors data to assist in development of affirmative action plans and strategies. The Training Institute, Personnel, the Office of Counseling and Career Development, General Services and Controller, the Office of Information Management and Communications, and the Office of the General Counsel are assigned specific duties under the revised order that are designed to fulfill the GAO policy of providing full employment opportunities to persons with disabilities and safeguarding their legal rights and benefits.

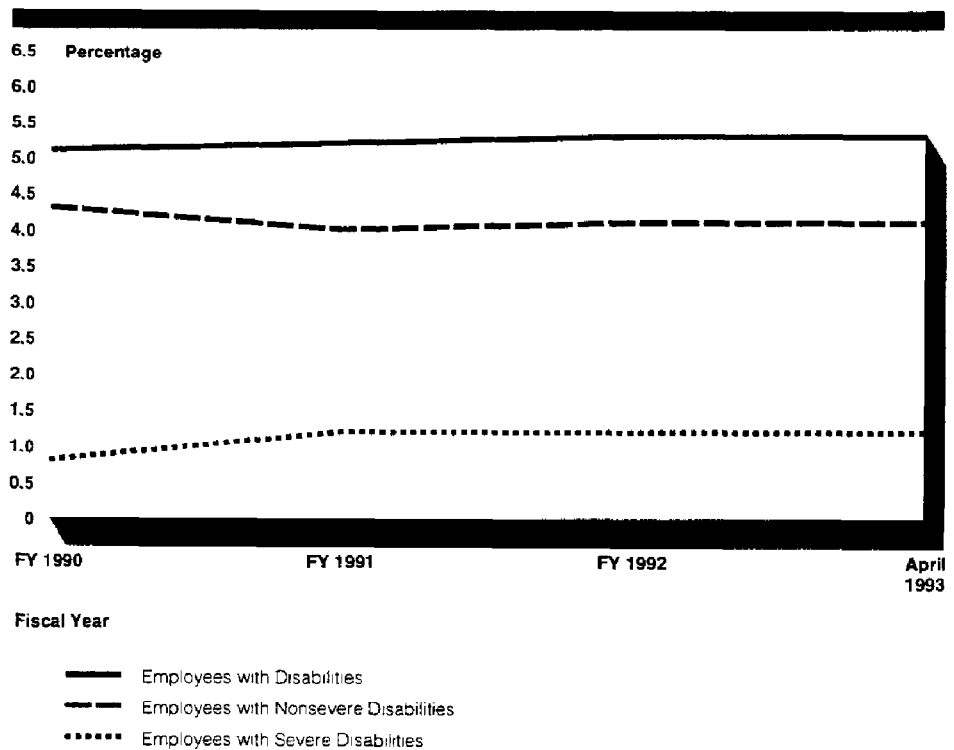
Trends in GAO Employment of Persons With Disabilities

The overall representation of persons with disabilities has remained fairly constant over the past 3 years (see fig. 4.1), which can be attributed, in part, to the hiring freeze in effect for the past year. Employees with disabilities make up about five percent of the professional staff (See fig. 4.2); there is higher representation among the remainder of the staff (See fig. 4.3).

Since publication of the 1990 report, representation of employees with disabilities has increased slightly in Band I and grades GS-6 through GS-12 (see fig. 4.4); declined then increased recently in Band II and grades GS-13 and GS-14 (See fig. 4.5); and generally declined in the SES, Band III, and grades GS-15 and GS-16 (see fig. 4.6).

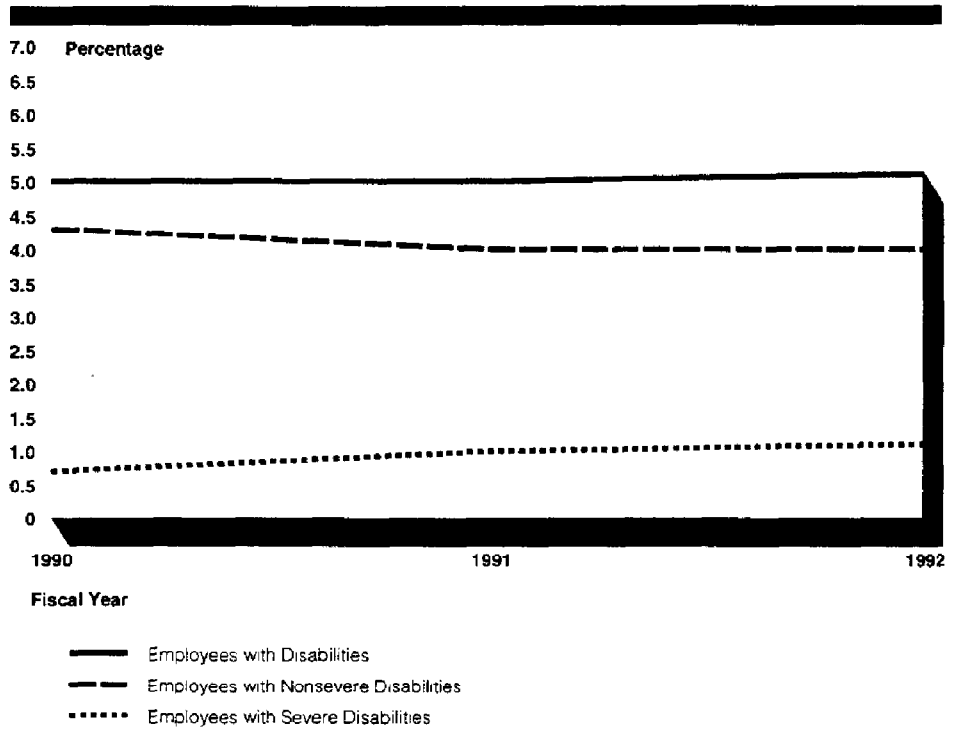
Although hiring is at a virtual standstill, hiring of persons with disabilities has increased in the past few years (see fig. 4.7).

Figure 4.1: Total Representation of Employees With Disabilities



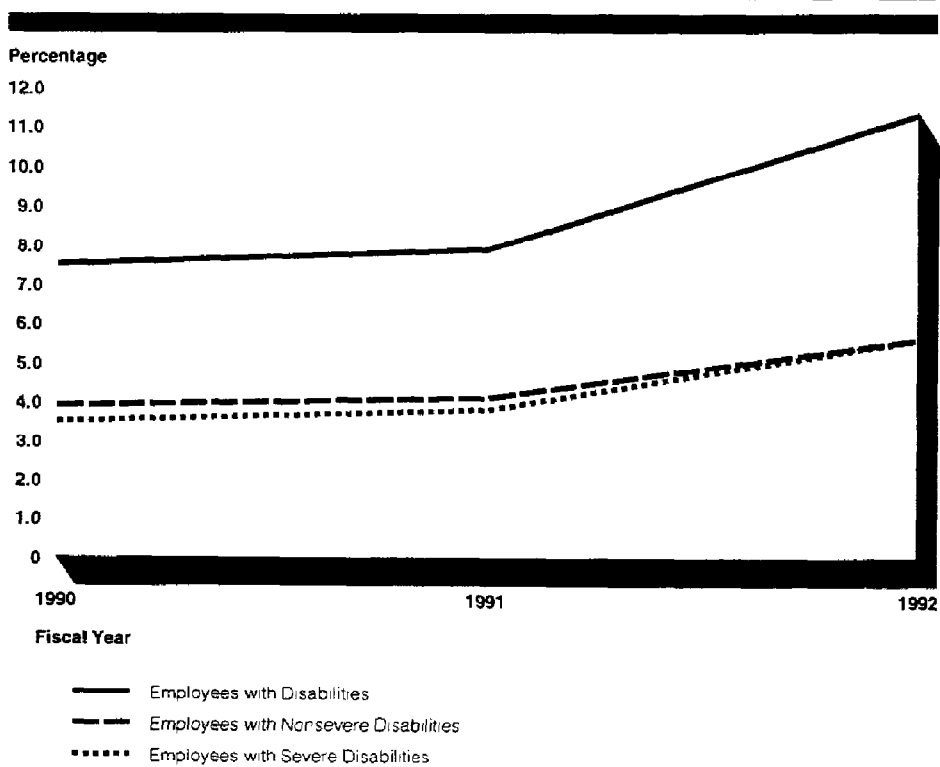
Chapter 4
Trends in GAO Employment of Persons
With Disabilities

Figure 4.2: Percentage of Employees
With Disabilities Among the
Professional Staff



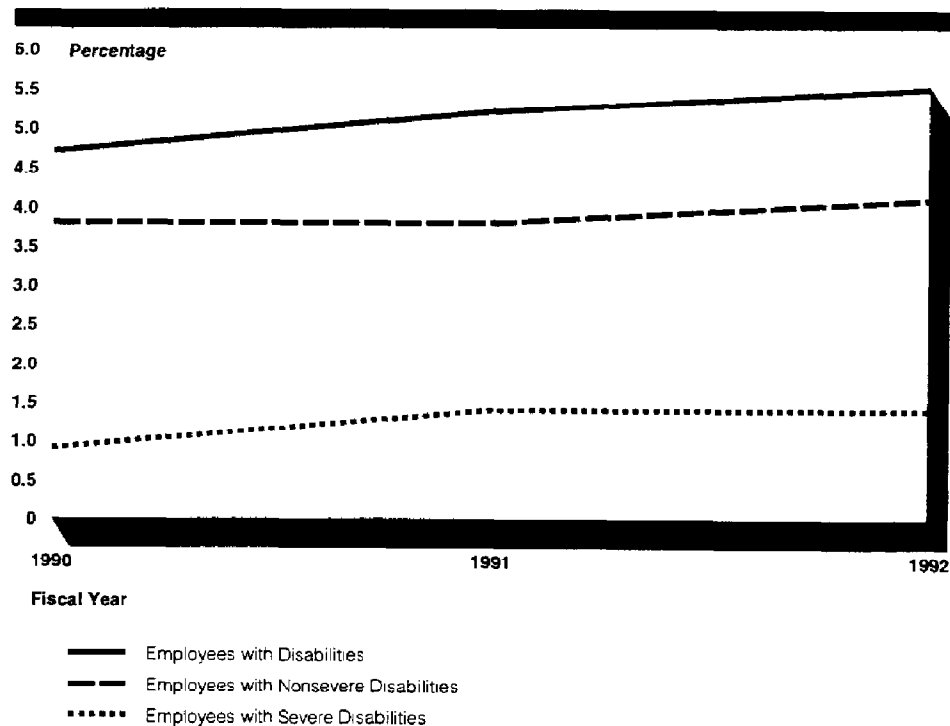
Chapter 4
Trends in GAO Employment of Persons
With Disabilities

Figure 4.3: Percentage of Employees
With Disabilities Among the Non
Professional Staff



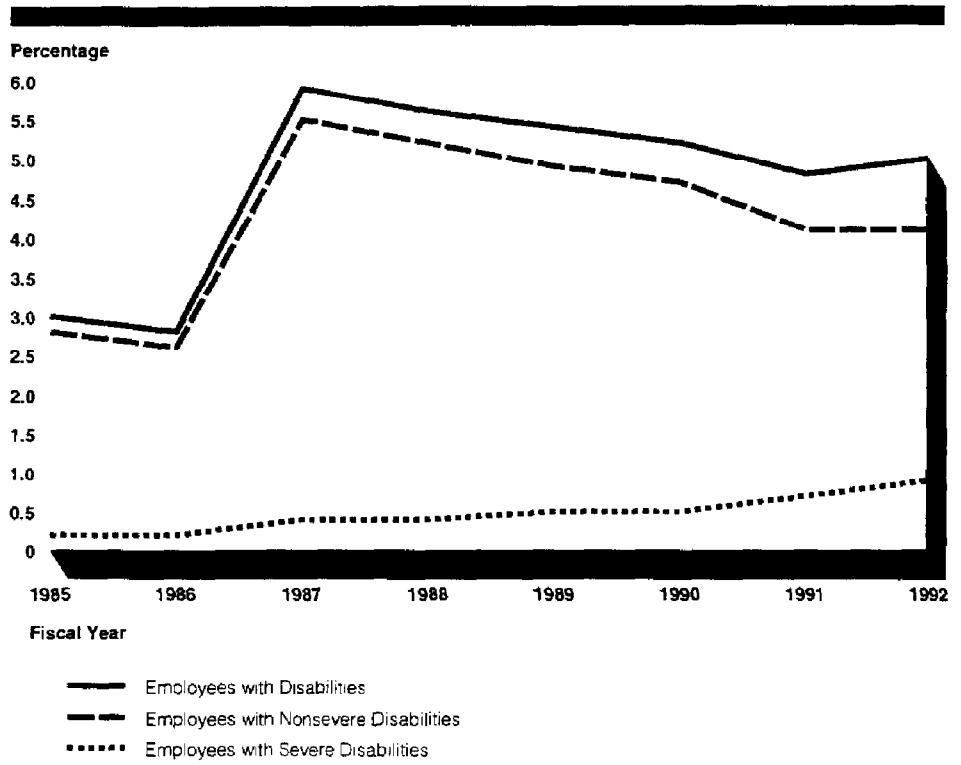
Chapter 4
Trends in GAO Employment of Persons
With Disabilities

Figure 4.4: Percentage of Employees
With Disabilities in Band I and GS-6 to
GS-12



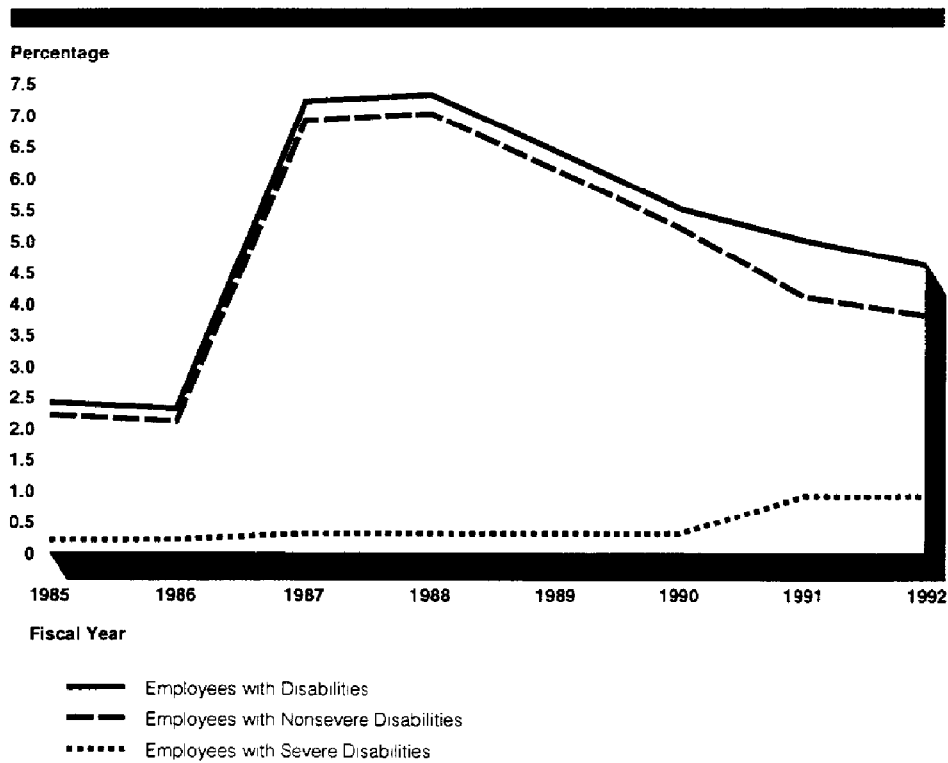
Chapter 4
Trends in GAO Employment of Persons
With Disabilities

Figure 4.5: Percentage of Employees
With Disabilities in Band II, GS-13, and
GS-14



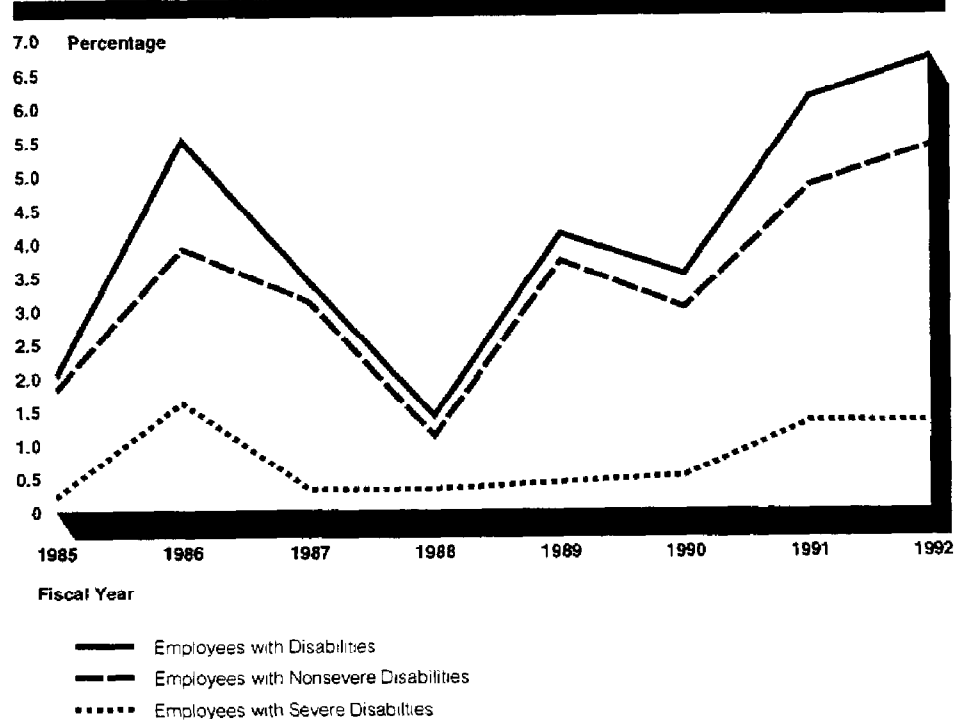
Chapter 4
Trends in GAO Employment of Persons
With Disabilities

Figure 4.6: Percentage of Employees
With Disabilities in Band III, GS-15,
GS-16, and the SES



Chapter 4
Trends in GAO Employment of Persons
With Disabilities

Figure 4.7: Representation of Persons
With Disabilities Among Permanent
New Hires



Conclusion

Since publication of the 1990 report and its recommendations, GAO has made significant progress in its efforts to ensure that persons with disabilities are afforded equal employment opportunities. Clearly the agency took the Board's recommendations seriously and, by doing so, has formulated a cohesive and comprehensive program designed to address many vital concerns and needs of employees and applicants with disabilities. While continuing to be attentive to ensuring accessibility and accommodation, the agency should exert more vigilance in hiring and promoting employees with severe disabilities and should offer broad-based training programs open to all employees that include information designed to dispel stereotypes and improve attitudes about employees with disabilities. Furthermore, in the interests of promoting productivity and efficiency and avoiding duplication, the agency should establish and maintain a database to track reasonable accommodation requests from employees that also indicates the nature of the requests and the responses to them.

Just 3 years have passed between the issuance of the Board's EEO Oversight Study of GAO's Employment of Persons with Disabilities and this follow-up study which has determined that GAO not only has complied with the letter of nearly all of the Board's recommendations but has attempted to capture the spirit and intent of the 1990 report, as well. This follow-up study afforded the Board a unique opportunity to assess the viability of its statutorily mandated oversight system. This follow-up study, undertaken with the full cooperation of GAO management and the employee councils, has demonstrated that the combined efforts of the Board and GAO can further the common goal of ensuring that the General Accounting Office has a diverse and representative workforce that can serve as a model for the Federal service.

Comments From the Deputy Assistant Comptroller General for Human Resources



Assistant Comptroller General
of the United States

Washington, D.C. 20548

December 14, 1993

Ms. Gail Gerebenics
Director, EEO Oversight
Personnel Appeals Board
Union Center Plaza II Suite 830
Washington, D.C. 20548

Dear Ms. Gerebenics:

We appreciate the opportunity to comment on the Personnel Appeals Board's (PAB) follow-up study on the employment of persons with disabilities within GAO. We were very pleased that the report acknowledged the significant efforts that GAO has undertaken over the past several years to develop a comprehensive program that is responsive to the needs and concerns of disabled employees and applicants.

While we were generally very satisfied with the study report, we have a few comments and points of clarification to offer.

-- The report mentions that the affirmative action plan does not prescribe eligibility criteria for individual development plans (IDPs). As described in the November 1992 affirmative action plan, persons with disabilities are responsible for identifying any developmental needs they may have, since we are not always aware of their disability. Managers, in consultation with the employee, are responsible for determining how best to satisfy these needs, including consideration of an IDP. We believe that additional eligibility criteria are unnecessary. The Office of Affirmative Action Plans, human resource staff in divisions and offices and staff in Personnel are available to assist managers and employees to develop these plans. The manager and the employee for whom the plan is developed would in effect implement the plan.

-- The Office of Affirmative Action Plans (OAAP) is responsible for monitoring the placement and advancement of persons with disabilities on a routine basis. As the study report acknowledges, GAO has had a hiring freeze in effect for almost 2 years. When hiring resumes, the Office of Recruitment will again play an active role in coordinating and monitoring GAO efforts to recruit and hire persons with disabilities.

**Appendix I
Comments From the Deputy Assistant
Comptroller General for Human Resources**

-- We assume that the reference to the Office of Research on page 10 of the report is an error and that you intended to mention the Office of Recruitment.

-- As you know, before a unit can deny any reasonable accommodation request, the decision must first be reviewed by my office. These requests are rarely denied. Units work closely with individuals who request an accommodation to satisfy their needs. We are not aware of any staff dissatisfaction concerning reasonable accommodation. We continue to think that developing a database, as recommended in the report, may discourage some employees from making a request. However, we will consider this matter further.

-- The report comments on a number of training courses that include materials and discussions on issues relating to the employment of persons with disabilities and recommends broad-based training. The current budget environment imposes considerable constraints on our ability to develop and offer additional broad-based training programs for all employees. However, in addition to the courses mentioned in the report, we will be offering a course on workforce diversity which addresses the notion of dispelling stereotypes and improving attitudes.

If you would like to discuss the report or other matters pertaining to the employment of persons with disabilities, please let me know. I can be reached on (202) 512-5533.

Sincerely,



Joan M. Dodaro
Deputy Assistant Comptroller General
for Human Resources

Comments From the Advisory Council for Persons With Disabilities

GAO

United States
General Accounting Office

Memorandum

DATE: December 14, 1993

TO: General Counsel, Personnel Appeals Board,
Jessie James, Jr.

FROM: President, Advisory Council for Persons
with Disabilities (ACPD), R. Tim Baden
R. Tim Baden

SUBJECT: ACPD Comments on PAB Follow-up Report on the
Progress of GAO's Disabled Employees Program

The ACPD appreciates your request for comments on the Personnel Appeal Board's follow-up report on the progress of GAO's program for persons with disabilities. In general, we agree with the PAB conclusion that GAO is making good progress toward producing a credible program for the agency's persons with disabilities. We are encouraged by the efforts of GAO staff offices to address concerns of GAO's employees with disabilities, such as the Office of Real Property Services' efforts to address employee concerns about accessibility within GAO's headquarters building. However, we would also maintain that a number of areas within the program need to be strengthened and continually monitored to maintain the programs' credibility.

For example, the lack of hiring goals or targets for persons with disabilities within GAO's affirmative action plan, limits GAO's ability to provide adequate internal monitoring and accountability to ensure GAO's commitment to hiring, placing, and advancing its employees with disabilities. GAO also needs to stress its efforts in certain areas such as (1) improving the representation of employees with severe and non-severe disabilities in evaluator and evaluator-related positions, (2) improving the current database on the number of GAO employees with disabilities, and (3) creating a database on the reasonable accommodations provided to employees. For these reasons, we would question the PAB's statement on page 3 that GAO



**Appendix II
Comments From the Advisory Council for
Persons With Disabilities**

has adopted nearly all of the recommendations made by the Board. While the Council believes that GAO is making good progress on a number of the recommendations, we would question whether GAO has "adopted nearly all of them."

Comments on September 1990 PAB Report Recommendations

Please note that the second sentence on page 5 of the report should list the titles of the ACPD officers as "President" and "Executive Vice-President." We would also suggest that you consider listing the names of the officers, since they can change on a yearly basis, thus confusing which individuals were involved with which particular report.

- 1) Establishment of a high-level position of Disabled Persons Coordinator with standing and authority

While our position on this issue is correctly stated in the report, we do see a need for GAO to improve the oversight of GAO's program for persons with disabilities. For example, there is a need to assign one person the task of coordinating the collection and management of all data on persons with disabilities, including a database on reasonable accommodations.

Additionally, the report gives the impression that GAO implemented a "program that focuses the resources of the agency, establishes accountability, and provides for monitoring in a number of areas." While we believe that GAO has made good progress, we still have concerns about the degree of accountability and monitoring within the program. For example, GAO's 1993 affirmative action plan for persons with disabilities lacks timelines for monitoring and evaluating GAO's efforts to promote persons with disabilities, thus raising questions about the plan's ability to establish accountability within GAO--a central function of an affirmative action plan. We strongly believe that the monitoring and evaluation should be conducted for all GAO employees with disabilities on an annual basis, thus, making GAO managers more accountable, and better demonstrating GAO's commitment to hiring, placing, and advancing its employees with disabilities.

- 2) Evaluation of the division of responsibilities among the Civil Rights Office, Office of Affirmative Action Plans, and Office of Recruitment

We would like to revise a statement attributed to the Council on page 8. The second line states that the Council "has no problem with the present structure and notes that the only issue left unresolved by the [GAO order 2306.1,

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Employment of Persons with Disabilities] is the determination of which office is to be the contact point for accommodation requests." This statement would more accurately reflect the Council's position if it was changed to read that the Council "believes the current structure is adequate for now, though coordination between the responsible offices can be improved in certain areas, such as determining which office is to be the contact point for accommodation requests."

- 3) Development, approval and implementation of an affirmative action plan for persons with disabilities

To make the third sentence of the last paragraph on page 8 more accurate, we suggest changing the language suggesting that "many of the Council's suggestions" were incorporated into GAO's affirmative action plan for persons with disabilities to "several of the Council's suggestions..."

Additionally, the report correctly states that the Council is concerned about the plan's lack of criteria for measuring the success of the plan and timeframes for doing so and then provides the example of individual development plans (IDPs). The current language used in this paragraph implies that the Council is referring to the IDP example. In fact, the Council is referring to the plan's reference that GAO will "periodically" monitor and evaluate the hiring, placement, and advancement of employees with severe disabilities. We believe that the "periodic" monitoring and evaluation should be conducted for all disabled employees on an annual basis.

Finally, while we concur with the last sentence that states that "hiring goals or targets for persons with disabilities are also not included in the plan," we would like to add that the lack of these targets and goals limits monitoring and subsequent accountability within the program for persons with disabilities.

- 4) Implementation of a data base to evaluate recruitment, hiring, placement, advancement, training, awards, and student programs

Please note that the first full line on page 10 refers to the "Office of Research" instead of the Office of Recruiting.

The Council believes that the baseline used for monitoring trends applicable to GAO's employees with disabilities may be low--due to underreporting and misreporting on GAO's self identification form 154. This is the major reason we are working with the offices of the Assistant Comptroller

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General for Operations and Affirmative Action Plans to improve the form. Therefore, we believe the reference to these efforts in line 6 on page 10 could be more correctly stated as "currently reviewing" the form, but that "due to concerns about the legal definitions of certain disabilities, GAO will probably wait for a government-wide effort to revise the form."

- 5) Establishment of a database to track reasonable accommodation requests and results

The Council did not make the comment that it "rejects the notion that tracking [employee requests] would have a chilling effect, positing that employee interest in acquiring whatever assistance is necessary to perform their jobs well overrides other concerns." However, we strongly support establishing the reasonable accommodation database and suggest that it be maintained without reference to the employees involved. The database could simply track what the accommodation need was and how it was accommodated--the names of individuals receiving the accommodation are not important.

- 6) Publicizing GAO programs geared toward employees with disabilities

In the last paragraph on page 11, the report states that GAO "has fully complied with this recommendation and...has assiduously promoted" its disability programs and policies. Our opinion is that this statement would be more correct in stating that GAO has "begun to comply with this recommendation and...has promoted" its disability programs and policies. While the Council is impressed with the enhanced exposure of issues involving persons with disabilities, including a number of programs and articles in Management News, and the publishing of a handbook providing information on resources and services available to persons with disabilities, we also believe that more can be done along these lines.

Additionally, the last line on page 11 has a typo which refers to the Council as "ACDP" and not ACPD.

- 7) Development of a handbook of GAO resources and services available to employees with disabilities

No additional comments.

- 8) Education and training for managers and supervisors of persons with disabilities

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While our understanding of the new course offered by the Training Institute is that it will help increase the awareness of GAO managers of GAO policies and programs for employees with disabilities, we did not have the understanding that the course would increase supervisors awareness of technology available to accommodate employees with disabilities. If such a component has been added to the course, we are certainly in support of that decision.

- 9) Requiring annual attendance at training programs, symposia, exhibits and conferences for those involved with carrying out GAO's programs

No additional comments.

- 10) Integration of management accountability systems

We were excited to learn that GAO is integrating its "responsibility for implementing agency policy affecting persons with disabilities into individual Senior Executive Service (SES) contracts and in supervisory standards and evaluations so that managers and supervisors can be held accountable for their performances in this area," as we were unaware that this is occurring. We strongly agree that management accountability systems need to be integrated into GAO's program for persons with disabilities to provide improved internal monitoring and subsequent accountability. However, we continue to be concerned that part of the difficulty in accomplishing this task centers on establishing a credible baseline from which GAO can measure and monitor its progress in recruiting, hiring, placing, training, advancing, and awarding persons with disabilities.

- 11) Setting up permanent TDDs

While the council's current understanding is that all GAO staff with hearing and/or speech impairments have access to TDDs, we were not aware that five portable TDDs "have been allocated to GAO staff." Our suggestion would be to change the language to state that the portable TDDs "are available to GAO staff."

- 12) Reactivation of the Buildings Access Committee

The statement on the bottom of page 16 and the top of page 17 states that the "Council is satisfied that its monitoring and constant testing of facilities by employees in the headquarters building is sufficient to ensure that accessibility remains an agency priority but remains concerned about the inaccessibility of the shuttle service." While the Council is pleased with its

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cooperative working relationship with the Office of Real Property Services, we are somewhat concerned that the report presents our role as undertaking "monitoring and constant testing" of GAO's facilities to ensure that accessibility remains an agency priority. We see our role as one of advising GAO management by providing feedback on employee concerns about accessibility issues throughout GAO. However, while Council representatives remain committed to their Council responsibilities, we are primarily full-time GAO employees with various responsibilities, including auditing/evaluating federal programs, writing reports and testimony, providing Congressional briefings, etc. Thus, while we will certainly pay attention to accessibility issues within GAO, our ability to conduct any "monitoring and constant testing" of GAO's facilities will be greatly constrained by our primary responsibilities.

- 13) Continued improvement of the Office of Recruiting's affirmative action outreach efforts

No additional comments.

- 14) Updating GAO orders that have provisions concerning employees with disabilities

In the PAB response to this recommendation, it was unclear whether the Board thought that GAO satisfied all of the components of this recommendation. Our suggestion is that the Board consider adding a conclusionary statement that explains the Board's stance along this line.

Followup Report's Conclusion

The conclusion in the report states that "not only has the agency complied with the letter of nearly all of the Board's recommendations, but it has attempted to capture the spirit and intent of the 1990 report, as well." The Council agrees that GAO has made significant progress in its efforts to implement its program for persons with disabilities. However, we also want to stress that the agency's efforts need to be expanded and continued on a number of fronts. In particular, GAO needs to continue its efforts in certain areas such as improving the representation of both severely and non-severely handicapped employees in evaluator and evaluator-related positions and in PFP bonus awards, and in changing unfavorable employee and management attitudes that are improving but continue to exist.

Additionally, we remain concerned that the affirmative action plan for persons with disabilities lacks hiring

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goals or targets for persons with disabilities and criteria for measuring the success of the plan and timeframes for doing so. The lack of these elements will continue to limit GAO's ability to provide adequate internal monitoring and accountability to ensure GAO's commitment to hiring, placing, and advancing its employees with disabilities. Because of these concerns, we are hesitant to fully endorse the PAB's statement that the agency has complied with nearly all of the Board's recommendations.

The ACPD appreciates the opportunity to comment on the PAB's follow-up report on the progress of GAO's program for persons with disabilities. If any further clarification of our comments is needed, please feel free to contact me at 512-6541.

cc: All ACPD Members
Margaret Barlow, CAAP
Diana Eisenstat, ACG-OPS

Comments From the Programs for People With Disabilities

GAO

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

January 12, 1994

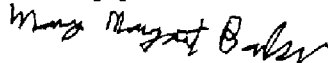
Ms. Gail Gerebenics
Director, EEO Oversight
Personnel Appeals Board
U.S. General Accounting Office
441 'G' Street NW
Washington, DC 20548

Dear Ms. Gerebenics:

Thank you for inviting me to comment on your draft follow-up report on GAO's responses to PAB's 1990 Oversight Report recommendations. My comments are included in Enclosure I. Most of my comments concern the direct participation of the Office of Affirmative Action Plans in the development of a viable program for persons with disabilities in GAO.

Please feel free to contact me if you need additional information. I am now back at my desk on a part-time basis and expect to be full-time by January 24th. I can be reached on 512-3287.

Sincerely yours,



Mary Margaret Barlow
Programs for People with Disabilities
Office of Affirmative Action Plans

Enclosure

Appendix III
Comments From the Programs for People
With Disabilities

Enclosure

Enclosure

Comments on draft Follow-up Report

Page 4, Paragraph 2 -- In contrast to this reference, OAAP began working on a new Affirmative Action Plan for Persons with Disabilities in early 1989. It was undergoing final revisions when the PAB published its EEO Oversight Study. (We note that this information appears correctly on page 8, paragraph 2 of your draft follow-up report.) The Comptroller General issued GAO's Affirmative Action Plan for Persons with Disabilities in July 1991 and it was revised in November, 1992.

Page 10, Paragraph 2 -- Staff from the Office of the Assistant Comptroller General for Operations and the Office of Affirmative Action Plans, in coordination with representatives of the Advisory Council for Persons with Disabilities, are currently developing a proposed update of GAO Form 154 (Self-Identification of Medical Disability).

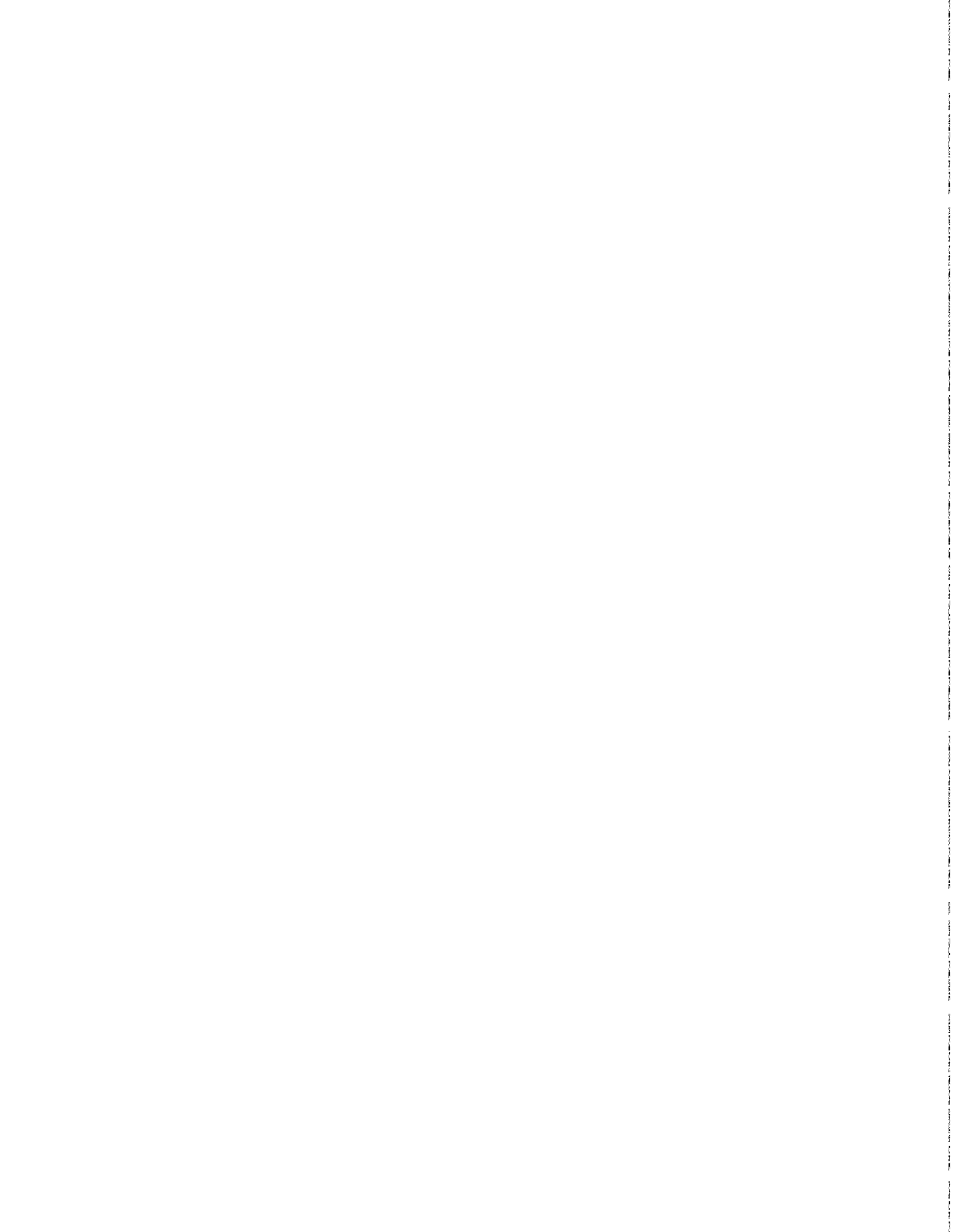
Page 14, Paragraph 1 -- The course for managers and executives that is now part of the Training Institute's Human Resources Management Series was developed in conjunction with the Office of Affirmative Action Plans. The Persons with Disabilities Program Manager served as a content and presentation advisor for this course for the original presentation and subsequent revisions.

Page 14, Paragraph 2 -- Staff with responsibility for recommending policies and administering GAO programs that affect employees with disabilities have attended workshops, symposia and conferences developed by The National Council on Disability, National Organization on Disability, Association on Higher Education and Disability and the President's Committee on Employment of People with Disabilities.

Page 15, Paragraph 2 -- In the process of allocating TDDs to the various GAO headquarters units and regional offices, the ACPD wrote request and advisory letters. The Office of Affirmative Action Plans worked closely with the Office of Information Management and Communications to assure that these devices were delivered and properly connected for functional use.

Page 16, Paragraph 1 -- The GS&C Design Review Committee asked the Office of Affirmative Action Plans to work with the ACPD in developing a committee on headquarters building accessibility which could provide information and suggestions for the overall renovation process. OAAP agreed to assist in this effort.

Page 16, Paragraph 1 -- GS&C is now requesting a van from GSA that can be made accessible to people with disabilities.



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