

PERSONNEL APPEALS BOARD

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



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September 28, 1990

**PERSONNEL**  
**APPEALS**  
**BOARD**

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:

Pursuant to the GAO Personnel Act of 1980, 31 U.S.C. 732(f)(2)(A), the Congress charged the Personnel Appeals Board of the General Accounting Office with equal employment opportunity oversight of GAO. As part of that responsibility, the Board undertook a study of persons with disabilities at GAO. The Board's oversight included the areas of reasonable accommodation, affirmative action, recruitment, training, hiring, accessibility of GAO facilities, and GAO's equal employment opportunity organization.

In conducting the study and issuing this report, the Board seeks to help GAO further the employment opportunities of persons with disabilities who are employed or wish to be employed by the General Accounting Office. Through the Americans With Disabilities Act, P.L. 101-336 (1990), the Congress and the President have committed the nation to afford equal employment opportunities to disabled persons. The Board believes that GAO, which has assumed leadership in many areas of government service, can and will be in the forefront of making that commitment a reality.

Sincerely yours,

A handwritten signature in cursive script, reading "Jessie James, Jr.", with a flourish at the end.

Jessie James, Jr.  
Chair

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### Abbreviations

AAP	affirmative action plan
ACPD	Advisory Council for Persons With Disabilities
AIDS	acquired immune deficiency syndrome
ATBCB	Architectural and Transportation Barriers Compliance Board
CRO	Civil Rights Office
EEO	equal employment opportunity
EEOC	Equal Employment Opportunity Commission
FM	Facilities Management
GAO	General Accounting Office
GS	General Schedule
HIV	human immunodeficiency virus
OAAP	Office of Affirmative Action Plans
OGC	Office of the General Counsel
OPM	Office of Personnel Management
OR	Office of Recruitment
PAB	Personnel Appeals Board
PEMD	Program Evaluation and Methodology Division
PERS	Personnel
PPF	Pay for Performance
SES	Senior Executive Service
TDD	telecommunications device for the deaf
TI	Training Institute
WG	Wage Grade

# Introduction

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The GAO Personnel Act of 1980, as amended, 31 U.S.C.732(f)(2)(A), authorizes the Personnel Appeals Board (PAB) to oversee equal employment opportunity (EEO) at GAO. The last time the Board addressed GAO's disabled persons program was July 1985. At that time, the Board issued to GAO a comprehensive oversight report on EEO, one portion of which concerned GAO's program to employ disabled persons.<sup>1</sup>

According to the PAB 1985 report, in 1972, GAO first established a Handicap Employment Program and appointed a part-time Coordinator in Personnel (PERS) to increase recruitment and hiring. By 1985, the program included a full-time Handicap Program Manager in the Civil Rights Office plus a part-time Selective Placement Coordinator in PERS. The job of the Manager was to advise GAO management on the policies and the procedures affecting disabled employees and applicants and to develop an affirmative action program for increasing the representation of disabled persons in the GAO work force. The Manager developed the GAO 1984-85 Affirmative Action Plan for disabled persons. The Selective Placement Coordinator handled recruitment and special hiring authorities used to appoint handicapped persons.<sup>2</sup>

With the Congress considering landmark legislation, the Americans with Disabilities Act, regarding the rights and protection to be afforded disabled persons, the Board selected for study GAO's recent efforts to employ and advance in employment disabled persons. By memorandum dated June 27, 1988, GAO and employee group chairs were notified that the Board would review GAO's disabled persons program in such areas as recruitment, building accessibility, reasonable accommodation, and affirmative action. PAB's Office of EEO Oversight conducted its investigation, and on June 14, 1989, by memorandum, PAB provided GAO program heads with a final opportunity to provide data input to the study.

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<sup>1</sup>*Oversight Review of GAO, Report to the GAO Personnel Appeals Board by the PAB General Counsel.* The review focused on building accessibility, evacuation procedures, and recruitment. The Board reported GAO assessments that the GAO headquarters building "is, for the most part, free of architectural barriers" and that GAO "had an active recruitment program for handicapped individuals." (See p. 86 of the report.) The report recommended that GAO headquarters ensure that proper evacuation procedures were in place in the regional offices and audit sites.

<sup>2</sup>In addition, the program was assisted by 15 collateral-duty coordinators in the regions and staff planners in various offices and divisions. Today collateral duty coordinators remain in all but one of the two regional offices that had no disabled employees (as of Feb. 1989, the date of the Board's Regional Managers survey). The duties vary greatly; they include conducting training and follow-up of disabled employees' progress, developing and implementing program policy, acting as a resource on reasonable accommodation, and attending EEO events.



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After a new Director of the PAB Office of EEO Oversight was hired in October 1989, additional data were gathered and evaluated. This is the Board's final report.

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### Objectives, Scope, and Methodology

This review addressed

- accessibility of building facilities and services,
- provision of reasonable accommodation and the existence of program initiatives,
- the existence of training for supervisors regarding issues related to employing disabled persons, such as training regarding selective placement appointing authorities,
- hiring and recruiting practices, and
- affirmative action plans (AAP).<sup>3</sup>

In addition, the Office of EEO Oversight reviewed GAO records and sent questionnaires to GAO employees who had identified themselves as disabled.<sup>4</sup> Regional Managers were questioned about building and services accessibility and efforts to carry out a disabled persons program. A questionnaire was sent to organizations identified by GAO as recruiting sources for the disabled to ascertain the effectiveness of GAO affirmative recruitment efforts. Further, the Board invited a representative of the Architectural and Transportation Barriers Compliance Board (ATBCB) to review the GAO headquarters building for the existence of physical barriers.

The Board compared EEO profile data of GAO's employment of disabled persons with that of executive branch agencies. In addition, a trend analysis was undertaken of disabled persons employment at GAO from fiscal years 1985-89, and Pay for Performance bonus data were compared.

Interviews were conducted and meetings held with GAO officials and employees who work or have worked in offices with EEO or EEO-related responsibilities. The offices contacted included the Office of Affirmative Action Plans (OAAP), the Civil Rights Office (CRO), the Office of Recruitment (OR), the

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<sup>3</sup>This report does not try to review GAO's handling of complaints of discrimination on the basis of disability.

<sup>4</sup>Consistent with executive branch procedures, GAO invites all new employees, by use of coded GAO Form 154, to identify any disability they may have. GAO Form 154 was revised in September 1989 to model more closely the Office of Personnel Management (OPM) form (Standard Form 256) used by the executive branch. See fuller discussion of self-identification of disability in ch. 2.

Training Institute (TI), Facilities Management (FM), and PERS. Each office was asked about its organizational structure and its EEO responsibilities and/or about how it serves the disabled employees and applicants. Further, data were obtained from the Office of the Deputy Assistant Comptroller General for Human Resources, which oversees the EEO offices. The Board also reviewed all GAO orders organizing and establishing the mission and the function of the various EEO<sup>1</sup> and EEO-related offices,<sup>5</sup> as well as those substantive orders setting forth GAO's EEO policies and practices pertaining to disabled persons employment.<sup>6</sup>

This report covers GAO's disabled persons program from 1985 through the end of calendar year 1989, focusing primarily on 1988 and 1989. Statuses of the programs during 1990, where known, are noted in the report.

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### Results in Brief

In 1985, CRO had a persons-with-disabilities program. Policy was made, data were collected, an affirmative action plan was developed, and program initiatives were undertaken. From about 1986, however, when the affirmative action plan responsibilities for women and minorities were transferred from the Civil Rights Office to the newly created Office of Affirmative Action Plans, a hiatus in GAO efforts to foster the employment of persons with disabilities began. The last affirmative action plan addressing disabled persons employment was developed for 1985. Internal monitoring has not taken place since that time. Only a handful of program initiatives has been undertaken since 1986. GAO's hiring of disabled persons through 1986 trailed behind that of the executive branch. Gains in 1987 hiring activity, however, narrowed the gap. Additudinal perception problems that are present on the part of some supervisors and employees were identified.

Shortly after the Board announced, in 1988, its oversight review of the disabled persons program, GAO renewed its interest in its program. Unfortu-

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<sup>5</sup>For example, GAO Order 0130.1.27, "Office of Affirmative Action Plans" (Oct. 8, 1986), and GAO Order 0130.1.26, "Civil Rights Office" (Oct. 8, 1986).

<sup>6</sup>For example, GAO Order 2306.1, "Selective Placement Programs" (Oct. 1, 1980), and GAO Order 2713.1, "Equal Employment Opportunity in the General Accounting Office" (Oct. 8, 1986).

nately, GAO's efforts, as reviewed through 1989, traditionally expected of the government as a "model" employer.<sup>7</sup>

GAO should reactivate its disabled persons program. Immediate attention should be paid to collecting data, preparing and implementing an affirmative action plan, internal monitoring, publicizing resources and services, training supervisors, establishing program initiatives, hiring, recruitment and promotional opportunities, reactivating the Buildings Access Committee, and coordinating efforts among the regional coordinators.

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### GAO and Employee Comments

The Board sought comments from GAO, the employee councils, and the PAB General Counsel (as employee representative). Comments were received from the Advisory Council for Persons With Disabilities (ACPD),<sup>8</sup> the PAB General Counsel,<sup>9</sup> and GAO.<sup>10</sup> Recent steps the ACPD and GAO have taken to improve the disabled persons program are outlined in the ACPD's letter. GAO also discusses recent management initiatives. Among other issues, GAO raises concerns about the completeness of the data in several instances. In large measure, the data to which GAO refers as omitted from the report are recent data outside the focus years of the study and/or data GAO provided to the Oversight Office for the first time as part of its comments. GAO's oral comments were made after the close of the comment period and while the report was being prepared for a target publication date of September 28, 1990. GAO's oral comments were followed by written comments on October 5, 1990. The Board considered these comments and made appropriate modifications to the report. The full text of GAO's comments along with a brief PAB Office of EEO Oversight reply are included as appendix XVII.<sup>11</sup>

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<sup>7</sup>It is well understood that the "Federal Government shall itself act as the model employer of the handicapped and take affirmative action to hire and promote the disabled." Section 501, *Rehabilitation of the Handicapped Programs 1976: Hearings Before the Subcomm. on the Handicapped of the Senate Comm. on Labor and Public Welfare*, 94th Cong., 2d Sess. 1502 (1976) (Statement of Sen. Williams). This responsibility was codified by the Equal Employment Opportunity Commission (EEOC) for executive branch agencies in 29 C.F.R. 1613.703. Also, see discussion of legislative history in *Prewitt v. United States Postal Service*, 662 F.2d 292, 302 (5th Cir. 1981).

<sup>8</sup>ACPD's comments are included as app. XV. Revisions were made to the "Results in Brief" section of the report as a result of the comments.

<sup>9</sup>The PAB General Counsel's comments are included as app. XVI.

<sup>10</sup>GAO's comments are included as app. XVII.

<sup>11</sup>The PAB Office of EEO Oversight reply follows GAO's comment letter in app. XVII.

# Identifying Persons With Disabilities

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To understand fully the issues involved in reviewing the employment of disabled persons, one must understand who is considered a qualified disabled person. Both the legal definition and the administrative approach used by executive branch agencies are relevant to a review of GAO's personnel practices. Both are discussed below.

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## Legal Overview

In 1980, the GAO Personnel Act (later amended in 1982) established a personnel management system for GAO, setting forth the principles by which GAO is to employ and manage its work force. This system is modeled after that established for executive branch agencies, and it includes, among other items, GAO's nondiscrimination requirements.<sup>1</sup> The act states "that all personnel actions affecting an officer, employee, or applicant for employment be taken without regard to . . . handicapping condition."<sup>2</sup> Further, the GAO personnel system incorporates the prohibition against discrimination on the basis of handicap in section 501 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 791 (applicable to executive branch agencies).<sup>3</sup>

The Rehabilitation Act uses the term "individual with handicaps" and defines such a person as one who "(i) has a physical or mental impairment which substantially limits one or more of such person's major life activities, (ii) has a record of such impairment, or (iii) is regarded as having such an impairment."<sup>4</sup> GAO has adopted this definition as its own.<sup>5</sup>

An individual's protection under the Rehabilitation Act often requires a case-by-case analysis and determination of whether that individual's condition meets the statutory definition. The focus is on whether the individual has a record of, or is perceived as having, (1) an impairment, (2) which

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<sup>1</sup>31 U.S.C. 732.

<sup>2</sup>31 U.S.C. 732(f)(1)(A). See also 31 U.S.C. 732(b)(1) and 5 U.S.C. 2301(b)(2). "Personnel actions" are understood to include decisions regarding hiring, promotion, discipline, detail, transfer, reassignment, performance evaluation, pay, benefits, awards, training, etc. See also 5 U.S.C. 2302(a)(2)(A).

<sup>3</sup>31 U.S.C. 732(b)(2) and 5 U.S.C. 2302(b)(1)(D); see also section 504, 29 U.S.C. 794, pertaining to federally conducted programs and activities.

<sup>4</sup>29 U.S.C. 706(8)(B).

<sup>5</sup>See GAO Order 2713.1, app. 1, para. 16, p. 10, and GAO Order 2306.1, ch. 1, para. 2, p. 1.

causes a substantial limitation, (3) on a major life activity. GAO Order 2713.1, adopting EEOC's definitions, further states that an impairment is "(1) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or (2) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities."<sup>6</sup> Major life activities include "caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working."<sup>7</sup> "Substantially limits" means the "degree that the impairment affects employability. A handicapped individual who is likely to experience difficulty in securing, retaining, or advancing in employment should be considered substantially limited."<sup>8</sup> Cases decided under the Rehabilitation Act have set forth the legal principle that whether an impairment constitutes a "substantial limitation" is to be determined by an individualized inquiry.<sup>9</sup>

Well-recognized disabling conditions, such as speech and visual impairments, mobility impairments, cancer, diabetes, epilepsy, and amputation, are covered by the Rehabilitation Act. The case law under the act has been interpreted to include also various less obviously disabling conditions, such as hypertension,<sup>10</sup> past hospitalization for tuberculosis,<sup>11</sup> hypersensitivity to tobacco smoke,<sup>12</sup> and asymptomatic spinal abnormalities.<sup>13</sup> Even an individual who has no disability may be protected by the law. An individual's exclusion from a job opportunity because the employer or the prospective employer perceives him or her to be disabled is prohibited by the law.<sup>14</sup>

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<sup>6</sup>GAO Order 2713.1, app. 1, para. 16, pp. 10-11; see also 29 C.F.R. 1613.702(b).

<sup>7</sup>GAO Order 2713.1, app. 1, para. 16, p. 11, and 29 C.F.R. 1613.702(c); see also GAO Order 2306.1, ch. 1, para 2c, p. 2.

<sup>8</sup>GAO Order 2306.1, ch. 1, para. 26, p. 2.

<sup>9</sup>See *E.E. Black, Ltd. v. Marshall*, 497 F.Supp. 1088, 1100 (D. Hawaii 1980).

<sup>10</sup>*Bey v. Bolger*, 540 F. Supp. 910, 916 (E.D. Pa. 1982).

<sup>11</sup>*School Bd. v. Arline*, 480 U.S. 273, 281-82 (1987).

<sup>12</sup>*Vickers v. Veterans Administration*, 549 F. Supp. 85, 86-87 (W.D. Wash. 1982).

<sup>13</sup>*Thornhill v. Marsh*, 866 F.2d 1182, 1184 (9th Cir. 1989). See also *Kimbrow v. Atlantic Richfield Co.*, 889 F.2d 869, 874-875 (9th Cir. 1989) (migraine headaches constitute a disability under Washington state law).

<sup>14</sup>29 U.S.C. 706(8)(b) and GAO Order 2306.1, ch. 1, para. 2e, p. 2.

Under certain circumstances, alcoholics; drug abusers; and individuals with contagious diseases, including those with acquired immune deficiency syndrome (AIDS), AIDS-related complex, and asymptomatic HIV infection (human immunodeficiency virus) are protected.<sup>15</sup> However, alcoholics and drug abusers “whose current use of alcohol or drugs prevents such individual[s] from performing the duties of the job in question or whose employment, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others” are not protected against discrimination in employment by the act.<sup>16</sup> Further, there is no protection against discrimination for an individual whose currently contagious disease or infection would either constitute a direct threat to the health or safety of others or prevent the person from performing the duties of the job.<sup>17</sup>

Individuals with handicaps are protected from discrimination when they are *qualified* to perform the job in question. GAO Order 2713.1 provides that a “qualified handicapped person” is one who “with or without reasonable accommodation can perform the essential duties of a job without endangering their own health and safety or that of others.” Under the GAO definition, to be qualified, the disabled person must also be one who, “depending on the type of appointing authority being used, meets experience and/or education requirements of the job or, meets the criteria for appointment under the particular type of special appointing authority used for hiring the handicapped person.”<sup>18</sup> Thus, in determining whether a particular disabled person is qualified, consideration must be given to whether a reasonable accommodation will enable the person to do the job in question. (See discussion on reasonable accommodation in ch. 5.)

Under the GAO Personnel Act and applicable GAO orders, the agency may not discriminate against a qualified disabled person in its selection practices and it must provide reasonable accommodation to the needs of disabled employees and applicants, regardless of where employees are stationed or working. The prohibition against discrimination generally means that employers may not use job qualification standards that screen out qualified disabled persons.

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<sup>15</sup>29 U.S.C. 706(8)(B) and (C); see also the Comptroller General's task force report entitled *Coping With AIDS in the GAO Workplace* (1987), pp. 67-69.

<sup>16</sup>29 U.S.C. 706(8)(B).

<sup>17</sup>29 U.S.C. 706(8)(B).

<sup>18</sup>GAO Order 2713.1, app. 1, para. 19, p. 11.

GAO has recently taken the position that it is not bound by the Rehabilitation Act's nondiscrimination requirements in section 504 but that, as a practical matter, it will be "guided by the substantive requirements of the Rehabilitation Act."<sup>19</sup> GAO further maintains that it is not bound by section 501 of the act, which pertains to the executive branch and requires preparation and implementation of an affirmative action plan.<sup>20</sup>

Nevertheless, GAO has, by GAO Order 2306.1, committed itself "to a policy that will provide equal employment opportunities for handicapped individuals and disabled veterans in Federal jobs."<sup>21</sup> The order also states that, "[t]he Comptroller General will . . . set GAO-wide objectives, develop affirmative action plans for management of the program, provide guidance to divisions and offices, annually update the affirmative action program plan, and evaluate program effectiveness."<sup>22</sup> The order sets forth components of the written affirmative action plan.

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### **"Targeted," or "Severe," Disabilities**

The Equal Employment Opportunity Commission has been authorized to act as lead among the executive branch agencies in the area of employment of disabled persons.<sup>23</sup> In carrying out its mandate to provide guidance on the affirmative action responsibilities of federal agencies, EEOC has developed a list of "targeted disabilities." In the area of affirmative action and

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<sup>19</sup>Memorandum from General Counsel James F. Hinchman to Director, Office of EEO Oversight, Personnel Appeals Board (Apr. 5, 1990).

<sup>20</sup>Some inconsistency has existed among GAO officials regarding whether GAO is covered by the Rehabilitation Act. Although the General Counsel's office maintains that GAO is not bound by any portion of that act (either section 501 or section 504), references to the act as pertinent legal authority may be found in several GAO documents. For example, the December 1987 Comptroller General's task force report, *Coping With AIDS in the GAO Workplace*, states that "GAO is thus bound by [section 504 of the Rehabilitation Act]" (p. 67). Various intra-agency memoranda provide other examples. See the January 5, 1990, memorandum from the Acting Director, Civil Rights Office, to heads of divisions and offices on "Interpreting Services for Deaf Employees." This memorandum offers section 504 of the Rehabilitation Act as the statutory basis for GAO's requirement to provide interpreters. Finally, GAO's Form 154, *Self-Identification of Medical Disability*, states that "the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 791 [section 501], et seq., requires federal agencies to establish programs to facilitate the hiring, the placement, and the advancement of handicapped individuals. The best means of determining GAO's progress in this respect is periodic reports." (See app. I for a copy of GAO Form 154.)

<sup>21</sup>GAO Order 2306.1, ch. 10, para. 1a, p. 45.

<sup>22</sup>GAO Order 2306.1, ch. 10, para. 1c, pp. 45-46.

<sup>23</sup>29 U.S.C. 791; Reorganization Plan No. 1 of 1978, sec. 4, 43 Fed. Reg. 19807 (Jan. 1, 1979); and Executive Order 12106 (44 Fed. Reg. 1053, Dec. 30, 1978). Under the Americans With Disabilities Act, P.L. 101-336, EEOC will have the same investigatory and enforcement authority as it has under title VII of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000e et seq.)

recordkeeping, agencies are to address the needs of all persons with disabilities but to especially emphasize employing individuals with targeted disabilities.<sup>24</sup>

Employees, usually upon entry into the federal work force, are given an opportunity, using a lengthy list of specific disabilities, to identify themselves as disabled. By so doing, they advise the employers that they are entitled to certain protection by law. Employees, however, may indicate that they do not wish to identify their handicap statuses. EEOC has designated certain disabilities on the self-identification list as "targeted."<sup>25</sup> GAO uses its Form 154 (see app. I) to invite new employees to designate any disabilities. GAO has also adopted the notion of "targeted" disabilities, replacing that executive branch term with the word "severe." The codes and the list of severe disabilities are identical to those used in the executive branch. The GAO form indicates that the data collected are to be used for periodic reporting and self-evaluation.

Although EEOC has designated targeted disabilities as requiring special attention in the employment arena, EEOC recognizes that some disabilities not designated as targeted are as severe as or more severe than some disabilities that are designated as targeted. EEOC advises executive branch employers "to make every effort to extend all considerations and benefits" to those with severe disabilities, even if not targeted disabilities.<sup>26</sup>

GAO, therefore, has both a nondiscrimination obligation, including the requirement to provide reasonable accommodation, and an affirmative action requirement toward people with "severe or nonsevere disabilities" and/or who meet the Rehabilitation Act's statutory definition of "individual with handicaps."

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<sup>24</sup>EEOC Management Directive 712, pp. 4-5, and EEOC Management Directive 713, p. 6.

<sup>25</sup>They are deafness (codes 16 and 17), blindness (23 and 25), missing extremities (28 and 32 to 38), partial paralysis (64 to 68), complete paralysis (71 to 78), convulsive disorders (82), mental retardation (90), mental illness (91), and distortion of limbs and/or spine (92). See EEOC Management Directive 712, pp. 4-5 and 40, and Standard Form 256.

<sup>26</sup>EEOC Management Directive 712, p. 5. EEOC management directives are not binding on GAO under the recent position taken by the GAO General Counsel. See discussion earlier in this chapter.



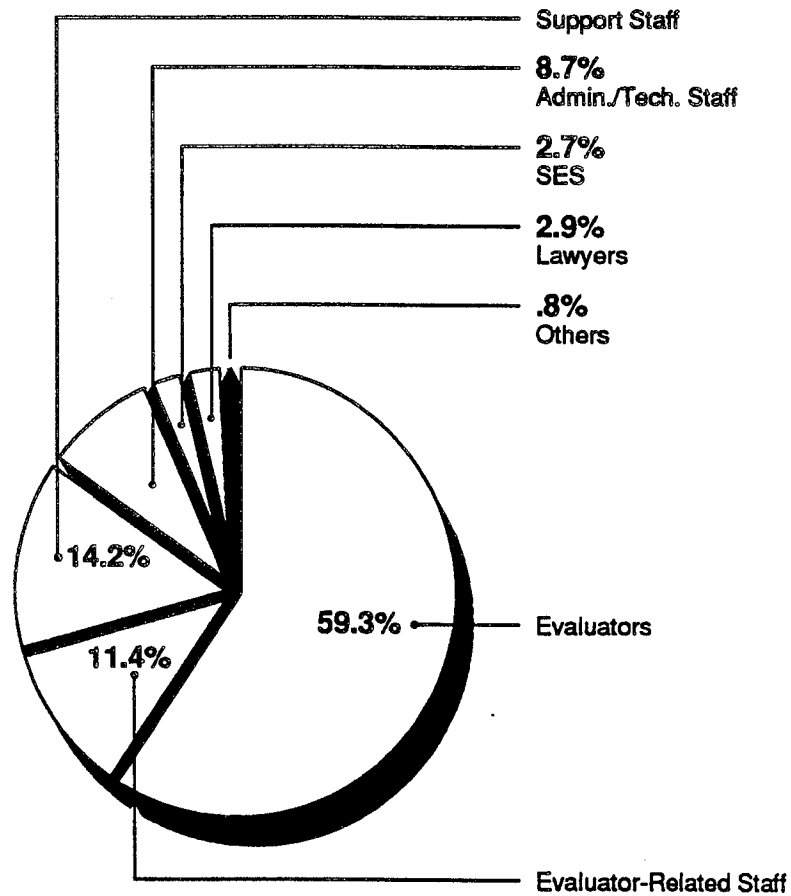


# The GAO Population of Disabled Persons

## Distribution of Disabled Employees by Job Category

Over 59 percent of GAO's 5,181 employees are evaluators. Evaluators and evaluator-related specialists constitute 70 percent of the work force. Figure 3.1 shows the fiscal year 1989 distribution of all employees by job category.<sup>1</sup>

Figure 3.1: Employees by Job Category

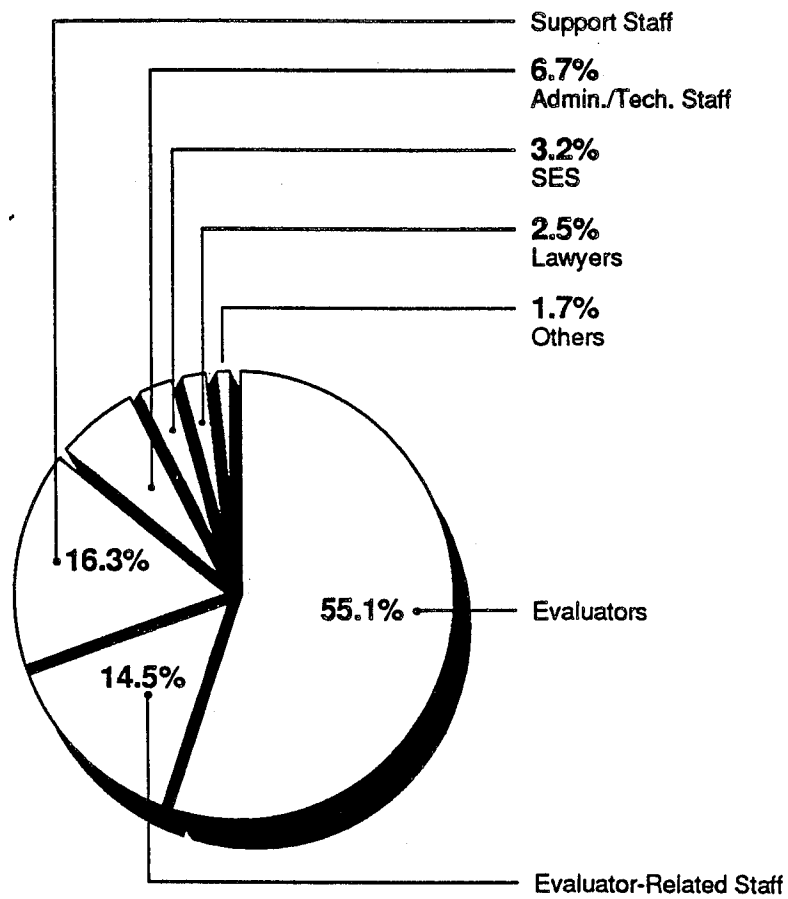


\*Others\* are blue collar employees.

<sup>1</sup>Job category data in figs. 3.1 to 3.3 cover permanent employees and were taken from payroll data as of the end of fiscal year 1989.

As noted previously, GAO, for recordkeeping purposes, divides persons with disabilities into those with severe and nonsevere disabilities. People with disabilities are represented in all job categories at GAO, albeit with heavier concentrations in some categories.

Figure 3.2: Disabled Employees by Job Category

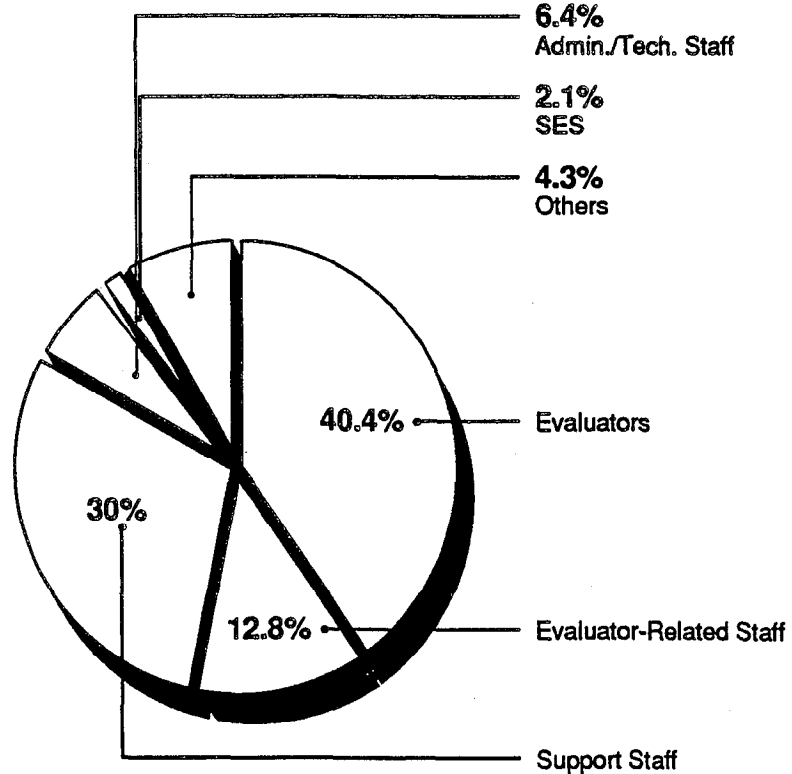


\*Others\* are blue collar employees.

At the end of fiscal year 1989, there were 283 disabled employees of a total of 5,181 employees, representing 5.5 percent of the work force.

The data show that people with severe disabilities are disproportionately concentrated in the support staff. Further, there are no severely disabled employees in the Office of the General Counsel.

**Figure 3.3: Severely Disabled Employees by Job Category**



"Others" are blue collar employees.

### Disabled Employees' Attitudes

In 1985, the Civil Rights Office was responsible for the disabled persons program. As one initiative to improve the program, CRO surveyed all 273 disabled employees and their supervisors.<sup>2</sup> The survey sought to obtain two vantage points on GAO's services to and the needs of disabled employees. Questions were posed about the need for accommodation (such as special equipment, modified work schedules, work space modifications, and work site obstacles), availability of training, job performance and job growth issues, and opportunities for advancement. The Program Evaluation and Methodology Division (PEMD) evaluated the survey results and made recommendations for agency action.<sup>3</sup>

Troubling aspects of the results included a discrepancy in perception regarding advancement opportunities. Thirty percent of disabled employees rated their chances for advancement as poorer than those for a nondisabled person, with concerns about the disability itself as a cause. Concerns about age-related considerations surfaced as well. Most supervisors, however, saw the chances for advancement as the same for disabled and nondisabled employees.

Questions regarding contacts with CRO and Personnel (which at that time had selective placement<sup>4</sup> and recruitment responsibility) showed that "relatively few" of the employees and their supervisors had contacted either CRO or Personnel for assistance. PEMD noted that of those who made contact, employees made more requests for assistance than did the supervisors and that the employees indicated greater dissatisfaction with the services, advice, etc., received. A problem frequently mentioned by both employees and supervisors was "lack of awareness of the Handicapped Program."

PEMD found, among other things, that the greatest employee need centered around training and chances for advancement, and it recommended that these issues be further investigated. Mere differences in perception demonstrated the need for more discussions between employees and supervisors concerning attitudinal and personal interaction issues. The low number of employees who used the disabled persons program (11 to 14 employees) as

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<sup>2</sup>A copy of the questionnaire is included as app. II.

<sup>3</sup>The response rate for this survey was 92.4 percent. Eighty of the 252 persons responding completed the detailed portions of the questionnaire. The PEMD results and recommendations are based upon this number.

<sup>4</sup>See discussion of selective placement in ch. 5.

contrasted with those who indicated they "may need" to use services (55 employees) raised questions about the program's effectiveness. The report noted "indications that contacts with Personnel and CRO leave some employees dissatisfied, especially in the areas of career development/performance appraisal, attitudinal barriers/discrimination, and counseling."<sup>5</sup> Key recommendations were to increase awareness and visibility of the program and to encourage greater use of the services available. CRO took no action on these recommendations.

In October 1988, CRO met with several members of the newly reactivated employee group, the Advisory Council for Persons With Disabilities. According to CRO, Council representatives expressed their view that management had no interest in promoting the disabled persons program.

Also in 1988, the PAB Oversight Office surveyed employees who had identified themselves as disabled.<sup>6</sup> The questionnaire sought to assess, among other items, the existence or the effectiveness of avenues to redress problems. Of 101 employees who responded concerning this issue, 50 percent said GAO had no effective means to resolve areas of concern. Some employees were simply unaware of whether any avenues existed. In response to the question of whether GAO tries to retain disabled employees, nearly 40 percent of the 107 respondents said no. A number of employees echoed a concern, raised in the 1985 CRO survey, that although GAO may try to retain disabled employees, promotional opportunities for them are limited. Training opportunities, however, were not seen as a problem by most respondents to the PAB survey.

A recurring theme, among those who responded, however, was dissatisfaction with management attitudes toward the disabled, that is, the existence of psychological or attitudinal barriers to employing the disabled. Some individuals were afraid to discuss their disabilities with supervisors for fear of being labeled "troublemakers" or that doing so would be "career limiting." Individual tales are varied. Employees recounted a few isolated instances of stereotyped attitudes. One employee stated that his supervisor had denied him an opportunity to work on Capitol Hill because the individual's disability might present an "embarrassment" to GAO. Another disabled individual, who had recovered from cancer, said he was told by

<sup>5</sup>Memorandum from Group Director, PEMD, to Director, Handicapped Program, on "Survey of GAO Handicapped Employees and Their Supervisors" (Nov. 4, 1985), p. 17.

<sup>6</sup>Of 310 disabled employees surveyed, 166 responded, for a response rate of 53 percent. The quantitative responses were tallied. An additional four employees who were sent the surveys returned them with responses that they did not consider themselves disabled. A copy of the PAB questionnaire is included as app. III.

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his supervisor that he would not be promoted to a supervisory position because of the supervisor's fear of a recurrence of the cancer with an attendant extended absence. An employee with a speech impairment said that he was told that chances for advancement were limited because of his disability. Other employees with disabilities were positive about the treatment they received from GAO. One employee stated that there is a "supportive attitude on the part of supervisors and others."

Most of the employees responding to the questionnaire stated they had not requested any accommodations from GAO. Of the 20 who stated they had sought accommodations, 12 stated that the requests had not been implemented. Of these employees, six had severe disabilities.

Recurring themes in the 1985 and 1988 surveys are the perception by disabled employees of the existence of limitations on advancement/promotional opportunities and a paucity of efforts to publicize the agency's program. Attitudinal barriers were raised as a serious problem in the 1988 survey.

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### **Representation Rates in Professional Staff<sup>7</sup>**

As noted previously, a majority of GAO's disabled employees are on the agency's professional staff. As shown in figure 3.4, GAO's professional work force has remained relatively stable in recent years, increasing slightly from fiscal year 1985 to fiscal year 1989. The band/grade distribution of the professional work force remained essentially unchanged from fiscal year 1985 through fiscal year 1989, although the percentages of Band II and Senior Executive Service (SES) staff increased slightly.

As shown in figures 3.5, 3.6, 3.7, and 3.8, the last 5 fiscal years overall at GAO have seen some gains in the representation of persons with any reported disability in the professional work force.<sup>8</sup> The trend in representation rates of professional disabled persons was strikingly similar in each grade/band grouping, as well as in the professional group as a whole. Disabled persons representation was stable in fiscal years 1985-86. This rate increased in fiscal year 1987 but has remained essentially unchanged since

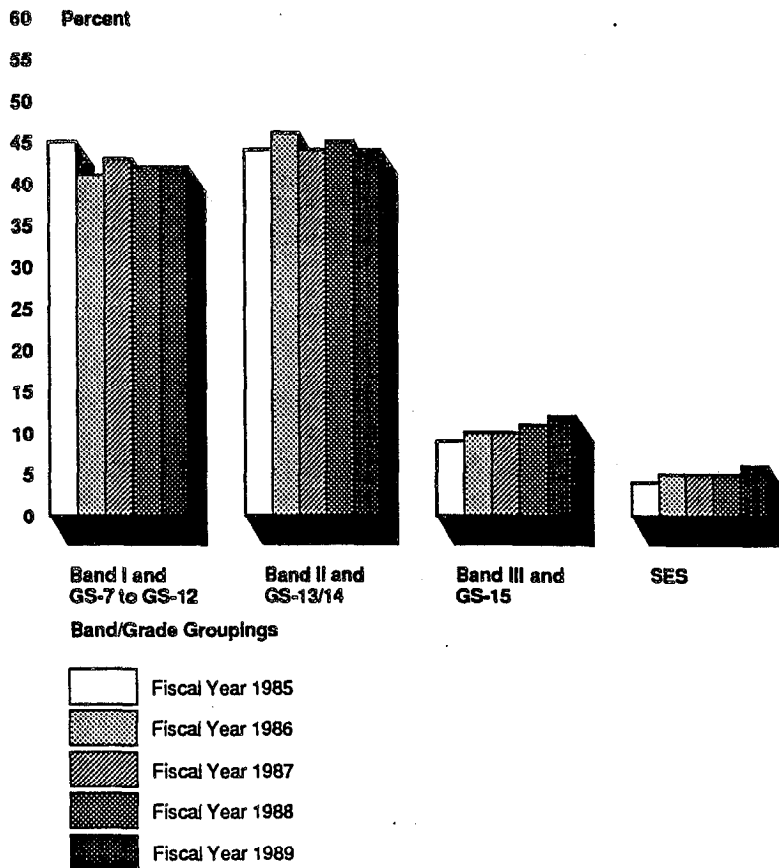
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<sup>7</sup>The professional staff is composed of all evaluators, evaluator-related personnel, managers, lawyers, and administrative and technical personnel.

<sup>8</sup>Representation data in figs. 3.5-3.8 cover permanent employees and were taken from end-of-fiscal-year payroll data.

then, with a slight dip in fiscal year 1989. The SES and Band III/GS-15 group, albeit the smallest, had the lowest representation rate in fiscal years 1985-86. Even though the absolute size of this group is small, the group experienced a threefold increase in fiscal year 1987, ending the period, in fiscal 1989, with the highest representation. When focusing only on the representation of persons with severe disabilities, however, there is a notable lack of progress.

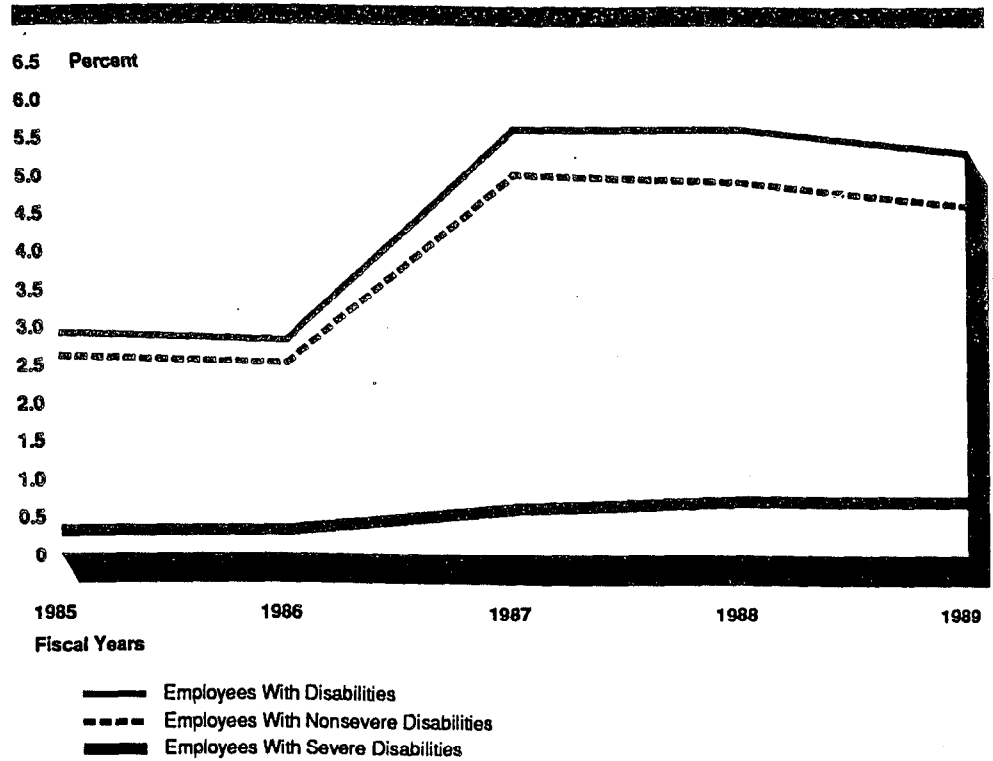
**Figure 3.4: Professional Work Force by Band/Grade Grouping**



Source: *Compendium of GAO Indicator Statistics for 1989* (Nov. 1989), p. 5.

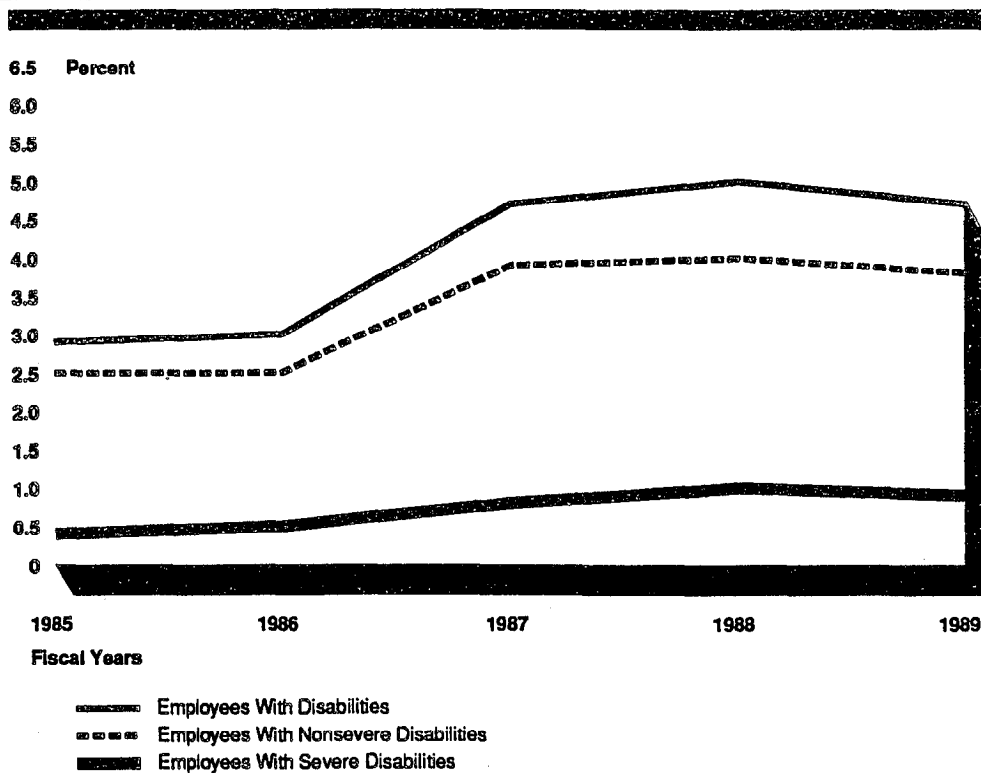


Figure 3.5: Representation of Disabled  
Persons in Professional Staff



See app. IV for the numbers and the percentages of persons with disabilities in the professional staff.

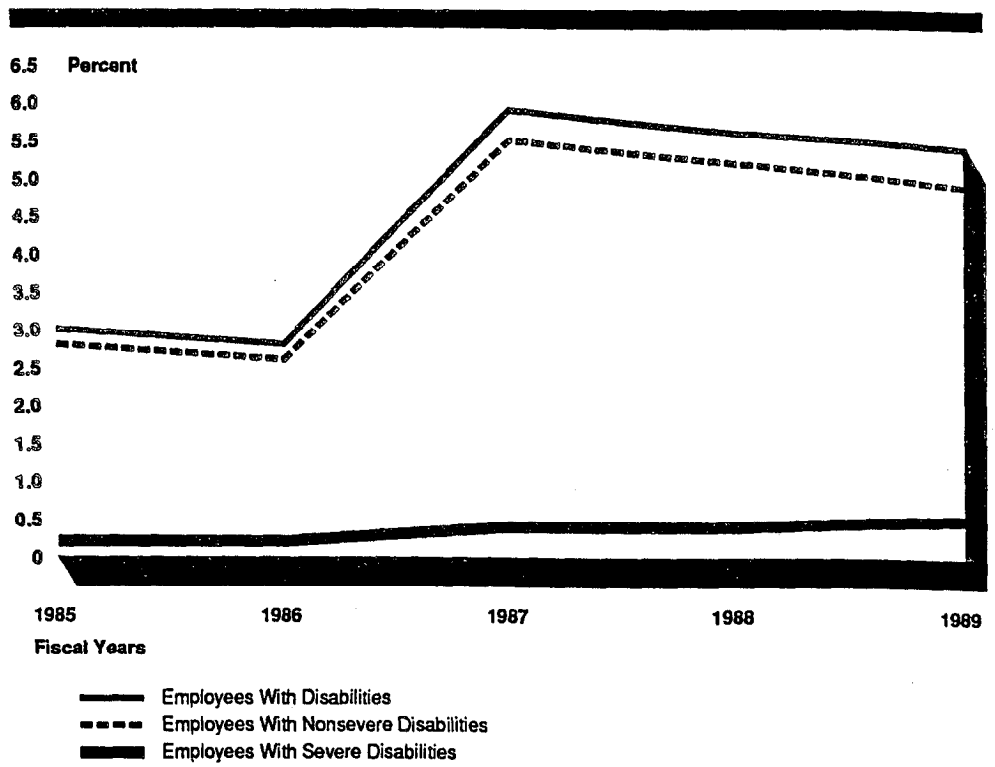
Figure 3.6: Representation of Disabled  
Persons in Band I and GS-7 to GS-12  
Grades



See app. V for the numbers and the percentages of persons with disabilities in Band I and the GS-7 to GS-12 grades.

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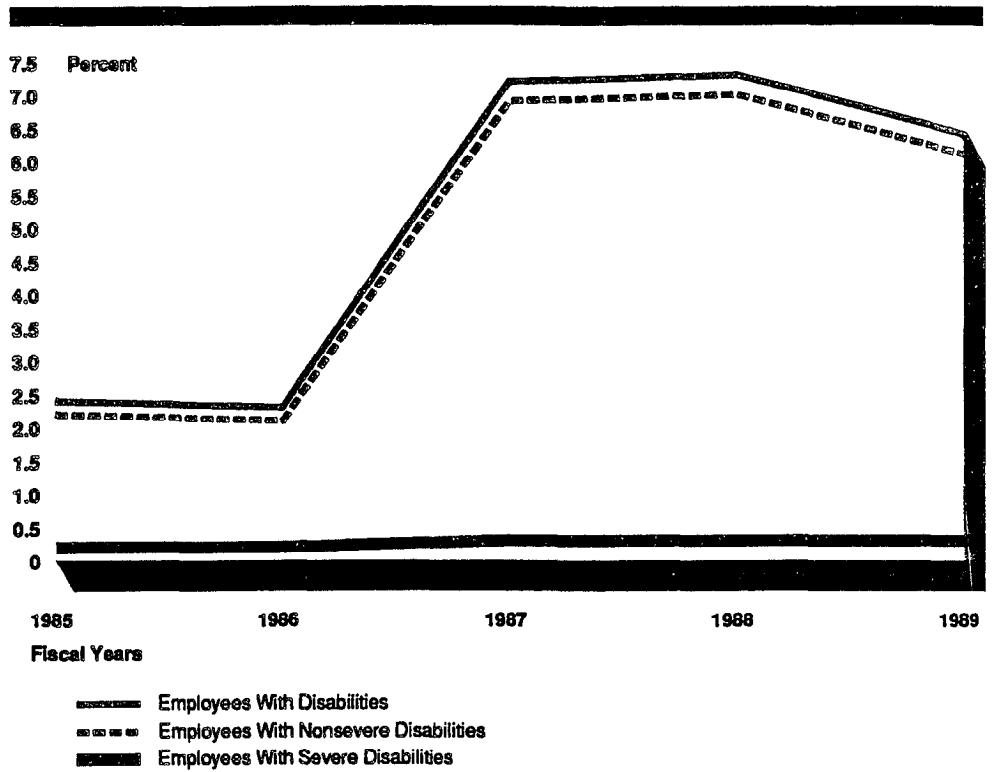
Figure 3.7: Representation of Disabled  
Persons in Band II and GS-13/14  
grades



See app. VI for the numbers and the percentages of persons with disabilities in Band II and the GS-13/14 grades.

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Figure 3.8: Representation of Disabled Persons in Band III, GS-15, and the SES



See app. VII for the numbers and the percentages of persons with disabilities in Band III, grade GS-15, and the SES.



# Pay for Performance

The 1985 CRO and 1988 PAB employee survey responses indicated that advancement opportunities are a concern to disabled employees. In the spring of 1989, GAO instituted its new Pay for Performance (PFP) system. About 70 percent of its staff (evaluators, evaluator-related specialists, and attorneys) are covered by PFP. This new system awards once-a-year bonuses to the top-ranked 50 percent of covered staff.

Fewer disabled employees received 1989 PFP bonuses than nondisabled employees. This discrepancy is statistically significant. Although 59 disabled employees received bonuses, this represents about 25 fewer bonuses than the disabled employees should have expected to receive on the basis of their representation in the eligible group.

**Table 4.1: Comparison of PFP Bonuses Awarded to Disabled Persons and Persons Not Disabled**

	Total number of eligible employees	Number and percent receiving bonuses	
		Number	Percent
Disabled	169	59	34.9
Not disabled	2,733	1,420	50.9

Source: GAO's PFP data base.

Of the 20 employees with severe disabilities, 45 percent received bonuses. No test of statistical significance was conducted on this small group.



# GAO'S Disabled Persons Program

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## Background

GAO's responsibilities to foster the employment of persons with disabilities are, for the most part, divided among three offices. They are the Civil Rights Office, the Office of Affirmative Action Plans, and the Office of Recruitment. Other offices with some program responsibility include the Training Institute, Facilities Management, and Personnel. Overall responsibility for EEO at GAO rests with the Deputy Assistant Comptroller General for Human Resources, who reports to the Assistant Comptroller General for Operations.

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## Affirmative Action Plans

GAO Order 2306.1 on selective placement programs sets forth GAO's commitment to EEO for disabled individuals, including a commitment to develop annually an affirmative action plan.<sup>1</sup> The order spells out the ingredients for an acceptable AAP.<sup>2</sup> The AAP is to include an assessment of past accomplishments and a plan of action, with target dates, for new initiatives. A GAO policy statement and statistics on GAO's employment of disabled persons are to be included as well.

In 1985, the Board reported on the GAO 1984-85 affirmative action plan for disabled persons ("the 1985 plan"). This AAP was prepared by the Handicap Program Coordinator in CRO and was modeled on the guidelines in GAO Order 2306.1.

In 1986, GAO reorganized its EEO offices as a result of recommendations made by internal management studies. Previously, CRO had been responsible for all EEO data collection and preparation of affirmative action plans. In 1986, a new Office of Affirmative Action Plans was created. New GAO orders set forth OAAAP's responsibilities and remaining CRO responsibilities.<sup>3</sup> As outlined in GAO Order 0130.1.27, OAAAP's mission and focus was on affirmative action to increase the numbers of minorities and women in the GAO work force. Although that order made numerous references to affirma-

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<sup>1</sup>GAO Order 2306.1, ch. 2, para. 1, p. 5, and ch. 10, para. 1, pp. 45-46.

<sup>2</sup>GAO Order 2306.1, ch. 10, para. 2, pp. 46-47. The AAP for disabled persons and veterans is to explain administrative organization at GAO, describe staffing resources, and include the Comptroller General's current affirmative action policy statement. A report of the previous year's accomplishments, in both qualitative and quantitative terms, and an assessment of the current status of GAO's program as it relates to the previous year's objectives are to be included. Problems are to be identified and a plan of action developed. The order contemplates receipt of input from supervisors, employees, advisory committees, and other interested groups. Finally, data on disabled employees and veterans are to be included.

<sup>3</sup>GAO Order 2713.1, GAO Order 0130.1.27, and GAO Order 0130.1.26.



tive action plans and efforts directed at women and minorities, no specific reference was made to affirmative action to increase the pool of qualified individuals with disabilities. Rather, that role remained with CRO.<sup>4</sup>

After issuing the 1985 AAP, CRO did not issue any further affirmative action plans to increase disabled persons employment. After the split of functions in 1986, CRO also abandoned its efforts to improve the accuracy of the data base on the numbers of disabled employees at GAO. The handicap program fell between the cracks. Not until August 18, 1988, did GAO indicate renewed interest. On that date, the Deputy Assistant Comptroller General for Human Resources, by memorandum, notified OAAP, with copies to CRO and OR, that an update to the 1985 plan for disabled persons should be developed. The memorandum shifted this responsibility to the Office of Affirmative Action Plans.<sup>5</sup>

To carry out these additional responsibilities, OAAP hired a part-time individual in January 1989. In July 1989, this individual left GAO, and the position remained unfilled until March 1990. Although that part-time employee tried to prepare an appropriate AAP for disabled persons, by the end of calendar year 1989, nearly 1-1/2 years after the Deputy Assistant Comptroller General directed preparation of an AAP, none had been issued.<sup>6</sup>

### Recruitment

A keystone of an effective program to promote the employment of disabled persons lies in an employer's recruitment activities. "Recruitment is a part of affirmative action, and outreach is essential."<sup>7</sup> The GAO Personnel Act incorporates the admonition that "[r]ecruitment should be from qualified individuals from appropriate sources in an endeavor to achieve a workforce from all segments of society."<sup>8</sup>

<sup>4</sup>GAO Order 0130.1.26, para. 4, p. 2.

<sup>5</sup>CRO has been and continues to be responsible for complaint processing, including complaints of discrimination on the basis of disability, and for serving as a resource to supervisors on devices to provide reasonable accommodation for disabled employees. One CRO EEO specialist also serves on the recently reactivated Advisory Council for Persons With Disabilities to give assistance and technical advice.

<sup>6</sup>The PAB Oversight Office has been apprised by OAAP that with the replacement of its disabled persons program staff analyst in late March 1990, efforts are again under way to prepare an AAP.

<sup>7</sup>*Handbook of Selective Placement of Persons With Physical and Mental Handicaps in Federal Civil Service Employment (OPM Handbook)* (OPM Doc. 125-11-3 (Dec. 1981), p. 11.

<sup>8</sup>5 U.S.C. 2301(b)(1) made applicable to GAO by 31 U.S.C. 732(b).

In April 1988, the Comptroller General's Task Force on Human Resource Management issued the report entitled *Human Resource Management Agenda for the 1990s*. One major recommendation of this report was to "[e]stablish a new high-level office to manage all of GAO's recruiting functions."<sup>9</sup> This was the impetus for creating the Office of Recruitment in May 1988. By October 1, 1988, all external hiring functions, except for SES and the Office of the General Counsel (OGC) positions, were taken over by OR.<sup>10</sup> The task force described the new office it envisioned. In managing recruitment and examination, this office would:

"(1) develop GAO hiring policy, guidance, and materials; (2) implement GAO's recruiting plans; (3) evaluate recruiting policies and practices to ensure organizational objectives are met; (4) provide centralized operational support for recruiting and examining for all GAO positions; and (5) establish criteria for the selection of recruiters and provide training for them."<sup>11</sup>

Although the new office was created in May 1988, a GAO order setting forth the mission and the function of OR was not issued until December 28, 1989.<sup>12</sup> Under this order, OR is responsible for setting recruitment policy and carrying it out by giving each unit's recruiters all necessary materials, processes, and support. OR is also responsible for data collection and tracking the success of new employees, with an eye toward improving recruitment activities. The divisions, regions, and offices continue to make the actual hiring decisions.

OR issues vacancy announcements, receives applications, processes them, and forwards them to managers for selections. There is an enhanced process, however, for the jobs of evaluators and the evaluator-related positions of computer scientist and accountant, known as the "OR-100" jobs. OR trains and provides support to the GAO recruiters, who recruit nationwide at colleges, job fairs, and other events for these positions. About 400 evaluators, evaluator-related specialists, and managers from headquarters and the regional offices serve as recruiters, on a collateral-duty basis, to recruit for

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<sup>9</sup>Human Resource Management Agenda for the 1990s, p. 9.

<sup>10</sup>This report does not address recruitment activities outside the parameters of OR's responsibilities. There are 9 disabled persons in the SES from a total of 142 and 7 in OGC from a total of 151 according to payroll data as of the end of fiscal year 1989.

<sup>11</sup>Human Resource Management Agenda for the 1990s, p. 9.

<sup>12</sup>GAO Order 0130.1.56, "Office of Recruitment" (Dec. 28, 1989).

the yearly OR-100 vacancies at GAO. In 1989, for example, 457 people were hired, 223 of whom were evaluators.<sup>13</sup> That same year, evaluator hires increased as a percentage of all hires, constituting nearly one-half of all hires. For the 223 evaluator jobs filled in 1989, GAO received nearly 6,000 applications.<sup>14</sup>

Recruitment activity geared toward increasing the pool of qualified disabled applicants is slowly evolving in OR. At first, OR requested only data regarding sex and race/ethnicity from applicants. At the Board's suggestion, OR now requests disabled status.<sup>15</sup> (All such information is requested on a voluntary basis.) This will enable OR to report on the disability status of the OR-100 applicants beginning with the 1989-90 college recruitment year.

In January 1990, OR officials advised the PAB Director of EEO Oversight that OR had no specialized telecommunications device for the deaf (TDD) to receive telephone calls from the hearing impaired, even though OR may be the first GAO contact a prospective applicant has. Now, a TDD is on loan to and in use at OR.

In addition, recent training materials, *Recruiting for the 1990s*, alert OR-100 recruiters to "selective placement," which gives special authorities that may be used to appoint disabled persons.<sup>16</sup> Guidelines for conducting campus visits mention federal nondiscrimination laws pertaining to disabled persons.<sup>17</sup> Finally, a section on "Special Emphasis Recruitment," regarding affirmative action, asks recruiters to "[i]dentify state or national level organizations that can provide information on . . . people with disabilities" and "[s]end notices to local organizations serving . . . people with disabilities."<sup>18</sup>

The Office of EEO Oversight obtained from OR its list of special emphasis organizations. Oversight sent a short questionnaire to each of the 65 organi-

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<sup>13</sup>Compendium of GAO Indicator Statistics for 1989, p. 6.

<sup>14</sup>Compendium of GAO Indicator Statistics for 1989, p. 6, and 1989 Annual Report of Key Performance Indicators, p. 36.

<sup>15</sup>See GAO Form 218a.

<sup>16</sup>Recruiting for the 1990s, ch. 3, p. 4; see also the discussion on selective placement in ch. 5 of this report.

<sup>17</sup>Recruiting for the 1990s, ch. 5, p. 11.

<sup>18</sup>Recruiting for the 1990s, ch. 9, p. 6. OR maintains a data base of special emphasis organizations, including those representing the disabled. As part of a "give and take" process between OR and recruiters, the list is maintained and updated.

zations on the list.<sup>19</sup> Of 65 surveys, 23 were returned with completed information.<sup>20</sup> Of those responding to the survey, 61 percent stated that GAO recruiters had no contact with their offices during 1989. Only two respondents applauded GAO's recruiting efforts geared for disabled persons. More than half reported that GAO's recruitment program was not effective.

There are no current procedures for OR to oversee the affirmative action outreach activities carried out by recruiters. Each unit reports to OR on a quarterly basis regarding its recruitment activity. These reports cover the upcoming recruitment plans and the past quarter's events, such as campuses visited and job fairs attended. OR reviews these reports for numbers of events, but not for affirmative action efforts. New hire and applicant data reflecting race and ethnicity are currently collected by GAO. As mentioned above, however, GAO is only beginning to collect disabled status during the 1989-90 college recruitment year.

On a collateral-duty basis, one GS-7 staffing assistant conducts additional recruitment of disabled persons in the Washington, D.C., area. This effort involves attending job fairs and conferences and contacting local divisions of vocational rehabilitation offices. When applications are received from disabled persons, the staffing assistant forwards them to the staffing specialist handling the pertinent vacancy announcement. In addition, OR assists and counsels regions on developing recruiting sources for disabled applicants.

Since its recent inception, OR has been slowly increasing its focus on strategies to enlarge the pool of disabled applicants. The bottom line results of GAO's program to increase the number of disabled applicants, however, rest with the agency's selecting officials. These officials need not justify their hiring decisions to OR. Furthermore, OR lacks authority to second-guess hiring done by these officials.

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### Selective Placement

The selective placement program concerns the "hiring, placement, and advancement of handicapped individuals in the Federal service and retention of Federal employees who become disabled. . . . The primary objective

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<sup>19</sup> A copy of the survey is included as app. XI.

<sup>20</sup> One survey was returned as nondeliverable, and three were returned without answers because the office receiving the surveys did not have the information requested regarding GAO's recruitment efforts.

is full and fair consideration of persons with disabilities."<sup>21</sup> As such, it includes both the prohibition against discrimination on the basis of disability and the requirement to take affirmative action to employ and advance in employment qualified disabled persons.

GAO Order 2306.1 sets forth the agency's policies and practices and the Comptroller General's commitment to a selective placement program to promote the hiring and the advancement of qualified disabled individuals. The order assigns a number of duties to Personnel. Such duties generally include

- (1) outreach and aggressive recruitment activities to increase the pool of qualified disabled applicants;<sup>22</sup>
- (2) program responsibility, including efforts to increase agency awareness of EEO toward persons with disabilities, through training, publicity, etc.;<sup>23</sup>
- (3) efforts to remove barriers and to provide reasonable accommodation;<sup>24</sup> and
- (4) provision of special authorities for temporary appointments for severely disabled individuals (who may then be converted to permanent appointments) and follow-up on their placements.<sup>25</sup>

Because of the existence of CRO and the creation of OAAP in 1986 and OR and TI in 1988, many of the responsibilities were no longer appropriately lodged with Personnel. The order, to date, has not been revised. CRO serves as a

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<sup>21</sup>OPM Handbook, p. 1; see also GAO Interim Order 2306.2, "Employment of Readers, Interpreters, and Personal Assistants for Handicapped Employees" (Aug. 24, 1982), ch. 1, para. 4.

<sup>22</sup>GAO Order 2306.1, ch. 2, paras. 3b(1), (2), (4), and (5), p. 6.

<sup>23</sup>GAO Order 2306.1, ch. 2, paras. 3b(3), (6), (9), (13) and (15), pp. 6-7.

<sup>24</sup>GAO Order 2306.1, ch. 2, paras. 3b(7), (8), (10), and (16), pp. 6-7.

<sup>25</sup>GAO Order 2306.1, ch. 2, para. 2e, p. 5, and ch. 2, paras. 3b(12) and (15), p. 7. The specific requirements for making a special appointment and the processing procedures are set forth in the order. See apps. IX and X for the numbers of employees hired and working at GAO under the special appointment authority.

resource to supervisors on devices to provide reasonable accommodation for disabled employees.<sup>26</sup> It has disclaimed responsibility for any other responsibilities set forth in the selective placement order. OR has assumed responsibility for liaison, outreach, and recruitment activities. TI officials, with whom the Board's EEO Oversight Director spoke, were unaware of the selective placement order. OAAP perceives itself to have no formal responsibilities under this order. Cooperation by OAAP with OR in liaison activities is informal and infrequent. Since the creation of OR, Personnel does not have a formal program to carry out the selective placement order.<sup>27</sup>

On December 28, 1989, GAO issued GAO Order 0130.1.56, establishing the mission and the function of OR. For the first time, GAO referred to a split of selective placement responsibilities. The order states that OR is responsible for only the hiring aspects of the selective placement order. The order does not delineate exactly which are the hiring-related duties and thus provides no guidance as to which office may be responsible for the remaining, clearly non-hiring-related, functions.

CRO, Personnel, and OGC are revising the selective placement order. Unfortunately, representatives from OR, OAAP, and TI (and possibly FM), which potentially have responsibilities under this program, are not included in these discussions. Also, whether the group revising the order has sought input from regional coordinators, who have an important role in carrying out the program, is unclear.

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## Training

GAO Order 2306.1, on selective placement,<sup>28</sup> itemizes various duties to promote the hiring, the placement, and the advancement of disabled individuals, two of which address training responsibilities per se. GAO has

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<sup>26</sup>This responsibility is given to CRO by GAO Order 0130.1.26, para. 4(n). See also GAO Interim Order 2306.2 (Aug. 24, 1982). In 1982, this interim order was issued, for comment, to implement amendments to 5 U.S.C. 3102, regarding employment of personal assistants for disabled employees. The interim order delineates GAO's program to appoint such assistants, including readers and interpreters for GAO employees. The interim order split responsibility between Personnel, which was given program responsibility, and CRO which was responsible for "monitoring program effectiveness," including recognizing needs and developing external resources for assistance personnel. The order also states that CRO was to identify "needs for *specialized equipment* of other than a personal nature. . . ." (Emphasis added.) This interim order has never been finalized.

<sup>27</sup>Of course, when an individual qualifying under a special appointing authority comes to Personnel's attention, that office will process the appointment under the selective placement authority.

<sup>28</sup>See full discussion of selective placement earlier in this chapter.

the duty to develop training materials designed to increase the awareness and the knowledge of supervisors of the capabilities of disabled persons.<sup>29</sup> Further, GAO has the duty to promote training programs for supervisors in order to improve their knowledge and understanding of the GAO disabled person's program.<sup>30</sup> In addition, GAO has the responsibility to advise management on proper appointment authorities for employing disabled persons.<sup>31</sup>

According to the Office of Personnel Management, the lead agency for the executive branch for the selective placement program, publicizing the program to supervisors is "especially important, since they are responsible for selecting new employees. . . . Awareness of goals and progress is a prerequisite for broad-based support of the program."<sup>32</sup> Further, in 1985, CRO surveyed disabled employees and their supervisors to obtain as complete a picture as possible of GAO's services to and needs of disabled employees. One recommendation resulting from the survey was to "promote more training for supervisors related to limitations of specific disabilities and ways of assisting and working with handicapped employees."<sup>33</sup> This resulted from a clear discrepancy in the perceptions of needs between disabled employees and their supervisors.

The Training Institute was established in 1988 as an outgrowth of the task force report entitled *Human Resource Management Agenda for the 1990s*. That report recommended establishment of a "GAO Institute, a central training authority, whose mission is to teach GAO policies and procedures and train staff in audit, evaluation and other skills necessary to fulfill GAO's mission."<sup>34</sup> Among other goals, the new office was to establish core curricula for supervisors.<sup>35</sup> The task force specifically recognized that "supervisors need to be better trained in their specific supervisory responsibilities."<sup>36</sup>

Through at least March 1990, however, no courses were offered that sensitized supervisory personnel to the full range of issues related to employing

<sup>29</sup>GAO Order 2306.1, ch. 2, para. 2h, p. 5.

<sup>30</sup>GAO Order 2306.1, ch. 2, para. 3b(13), p. 7.

<sup>31</sup>GAO Order 2306.1, ch. 2, para. 3b(15), p. 7.

<sup>32</sup>OPM Handbook, p. 20.

<sup>33</sup>See discussion of the 1985 CRO survey in ch. 3.

<sup>34</sup>*Human Resource Management Agenda for the 1990s*, p. 13.

<sup>35</sup>*Human Resource Management Agenda for the 1990s*, p. 15.

<sup>36</sup>*Human Resource Management Agenda for the 1990s*, p. 15.

the disabled. The sole related course offered to managers was: "A Management Workshop: EEO Responsibilities." This half-day course covered a multitude of nondiscrimination laws to enhance the practice of EEO principles in hiring and performance management. It did not elaborate on disabled people as a specific group but included only passing references to that aspect of the GAO Personnel Act and to the Rehabilitation Act of 1973, which prohibit discrimination against qualified disabled individuals. Responses to a PAB Oversight Office questionnaire indicated that supervisors in nearly half of the regional offices had no training regarding responsibilities toward disabled employees and applicants.<sup>37</sup>

A course entitled "New Supervisors Seminar" is under development. It will discuss discrimination against disabled individuals. According to TI, a pilot of this course was to be tested in the summer of 1990. Materials available to the Board's EEO Oversight Office in March 1990 indicated that this course did not cover selective placement appointing authorities,<sup>38</sup> affirmative action plans for the disabled, or elimination of attitudinal barriers. Nor does TI plan to develop a course on these matters for long-term supervisors.

TI collects EEO training participant data consisting of race, sex, and social security number, but it does not collect disabled status. At present, TI issues no reports with the EEO data it collects. It does offer accommodations for participants with disabilities. Interpreters, braille, or typed copies of materials, for example, are available with advance notice.

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### Reasonable Accommodation

Reasonable accommodation is a basic concept in nondiscrimination and affirmative action. GAO defines "reasonable accommodation" as "[l]ogical and reasonable modifications to a job and/or the work environment that enable a qualified handicapped person to perform the duties of the job."<sup>39</sup> GAO is required to provide reasonable accommodations for the needs of disabled employees and applicants unless doing so would present an undue hardship.<sup>40</sup>

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<sup>37</sup>A copy of this questionnaire is included as app. XII.

<sup>38</sup>The course, entitled "Recruiting for the 1990s," refers to disabled persons as a special focus group, mentions special appointing authorities for disabled individuals, and provides some training in nondiscriminatory interview techniques. This course is designed, however, to train recruiters, not supervisors (except insofar as they function as recruiters).

<sup>39</sup>GAO Order 2713.1, app. 1, para. 20, p. 11.

<sup>40</sup>See 31 U.S.C. 732(b)(2); 5 U.S.C. 2302(b)(1)(D); GAO Order 2713.1, ch. 2, para. 4d, p. 5; and 29 C.F.R. 1613.704(b).



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In particular, reasonable accommodation is understood to include (1) making facilities accessible to and usable by the disabled; (2) job restructuring and approving part-time or modified work schedules; (3) acquiring or modifying equipment or devices; (4) modifying examinations; and (5) providing readers for blind persons, sign language interpreters for deaf persons, and personal assistants for otherwise disabled persons.<sup>41</sup>

CRO is responsible for serving as a resource on reasonable accommodation.<sup>42</sup> CRO has undertaken a few initiatives in the past 2 years, most notably in the area of providing interpreters for the hearing impaired. In a January 5, 1990, memorandum to division and office heads, CRO reminded them of the legal requirements on GAO to provide for interpreting services for hearing-impaired participants at meetings, conferences, and training programs. As part of this initiative, GAO established, in February 1990, a separate budget for these services. In September 1988, CRO reactivated the Handicap Advisory Committee. This group was one of several employee groups chartered by GAO to provide top management with advice and recommendations regarding policies and procedures as they affect equal employment opportunity.<sup>43</sup> The group, now renamed the Advisory Council for Persons With Disabilities, has recently elected officers, and its efforts are under way to advise management on policy and program concerns.

Although not under the auspices of CRO, in December 1987, an excellent task force report was prepared, entitled *Coping With AIDS in the GAO Workplace*. The report fully analyzed all pertinent issues and made recommendations for agency action. The PAB Oversight Office did not investigate whether the recommendations were being carried out.

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### Architectural Barriers

The Congress created the Architectural and Transportation Barriers Compliance Board to ensure that federal buildings and facilities covered by the Architectural Barriers Act of 1968 were accessible to and usable by physically handicapped persons.<sup>44</sup> A facility is deemed accessible if it complies

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<sup>41</sup>29 C.F.R. 1613.704(b) and *OPM Handbook*, p. 5.

<sup>42</sup>GAO Order 0130.1.26, para. 4(n), p. 2; see also GAO Interim Order 2306.2, ch. 1, para. 4, p. 2, and discussion on selective placement earlier in this chapter.

<sup>43</sup>See GAO Order 2713.5, "Civil Rights Advisory Groups in the General Accounting Office" (Nov. 6, 1984), and GAO Order 2713.1, Chg. 1, "Equal Employment Opportunity at the General Accounting Office" (Jan. 10, 1985), discussing employee civil rights groups.

<sup>44</sup>42 U.S.C. 4151 *et seq.*

with this act. Building managers and health and safety personnel must be involved in efforts to remove barriers.<sup>45</sup> An evaluation of barriers must address parking and approaches to building entrances; travel within the building (stairways, elevators, door widths, etc.); services and amenities (restrooms, cafeterias, etc.); and hazards (evacuation procedures).<sup>46</sup>

In January 1989, at the request of the PAB Director of EEO Oversight, ATBCB conducted an accessibility study of GAO headquarters, where extensive renovations had been under way for some time.<sup>47</sup> ATBCB was "heartened and encouraged by the cooperation and foresightedness" of the GAO. Numerous barriers were identified, however. For example, ATBCB noted as a recurring problem that doors to women's restrooms did not open with the required clearance and an accessible lavatory and a mirror were not present in each restroom. ATBCB also noted the inaccessibility of the health unit and canteen on the first floor.<sup>48</sup> With some few exceptions, these were not violations, because they were constructed or altered at a time not subject to the act. (Alterations and new construction dating from Aug. 7, 1984, are subject to the act's implementing standards.) ATBCB found it acceptable for GAO to remove the barriers and the few violations as part of the ongoing maintenance and renovation work.

In response to the ATBCB review, GAO, in April 1989, convened a Buildings Access Committee, consisting of seven representatives drawn from FM, OGC, the Office of Security and Safety, OAAP, and CRO. The Committee resolved to make facilities accessible "to the extent possible," using the act's implementing standards as a guide. The Committee met with an ATBCB representative and sought her assistance in planning for corrective action, developing a policy statement on facilities access, and developing a plan to review other GAO facilities to determine whether corrective action was necessary. Also, ATBCB provided training to Committee members. GAO's Deputy Director of General Services and Controller, on July 13, 1989, advised the PAB Oversight Office that the Committee was to begin to create a comprehen-

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<sup>45</sup>OPM Handbook, p. 26.

<sup>46</sup>OPM Handbook, p. 26. This report does not address the adequacy of evacuation procedures at the various GAO buildings. GAO Order 1010.1, "Occupant Emergency Plan for GAO Building" (Sept. 7, 1987) provides for evacuating disabled persons in emergencies. The employee responses to the PAB Oversight survey noted instances when adequate procedures were not in place in GAO buildings. At headquarter a person in a wheelchair was trapped during a fire and no one knew the procedures for evacuating a mobility-impaired person. In another case, during a bomb threat, a deaf employee was in the office for 1 hour before a security guard provided notice. The dates of these incidents were not indicated in the responses.

<sup>47</sup>A copy of the report is included as app. XIII.

<sup>48</sup>The canteen has been relocated since the ATBCB study.

sive list of areas for improvement, to serve as the basis for establishing priorities.<sup>49</sup>

Between July 1989 (when the OAAP representative left GAO) and at least February 1990, the Committee did not meet, no comprehensive list of improvements was made, no policy statement was issued, and no priorities were established. According to FM, work on the maintenance/modernization program is proceeding as planned and all such work is to be in accordance with federal accessibility standards.

A PAB survey of regional managers revealed that the approaches to all regional buildings were considered generally accessible to the disabled.<sup>50</sup> All elevators but one were usable by persons in wheelchairs and sight-impaired persons. Most elevators did not offer audible signals for floor stops. All but one regional location had washrooms accessible to employees in wheelchairs, although often necessities/amenities, such as mirrors, shelves, and soap, were out of reach.<sup>51</sup> Some wheelchair-accessible stalls did not have doors for privacy. For the most part, accessible water fountains and public telephones were available. All cafeterias were accessible. Most cafeterias, however, had some items, either food, trays, or silverware, out of reach to individuals in wheelchairs. By and large, interior offices were accessible, but not without some problems. For example, the library in one regional location had aisles too narrow for a wheelchair to get through. No formal ATBCB reviews were conducted for other than GAO headquarters.<sup>52</sup>

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<sup>49</sup>A copy of the July 13, 1989, letter is included as app. XIV.

<sup>50</sup>A copy of the questionnaire is included as app. XII.

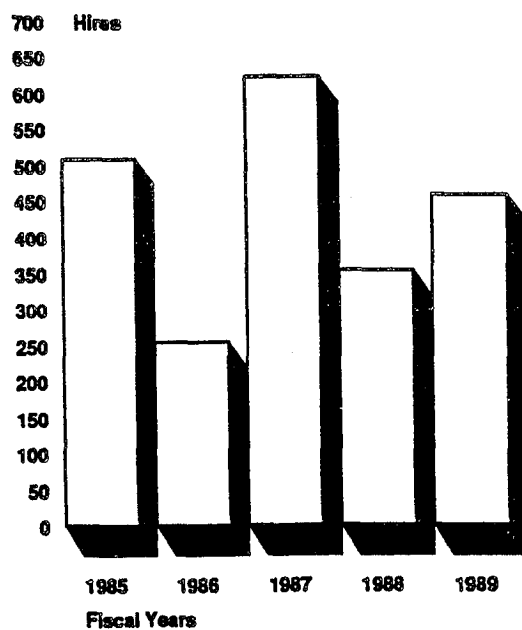
<sup>51</sup>The one office having an inaccessible washroom had, at the time of the PAB survey, no disabled employees.

<sup>52</sup>ATBCB did note, however, that the Personnel Appeals Board is housed in a "totally inaccessible" building but did not find that the building, constructed in 1887 and subsequently improved, is subject to the Architectural Barriers Act. The Board is seeking new quarters. Future quarters will be accessible.

# Hiring Trends

Total hiring levels have been erratic at GAO during fiscal years 1985-89, with an increase of nearly 30 percent from 1988.

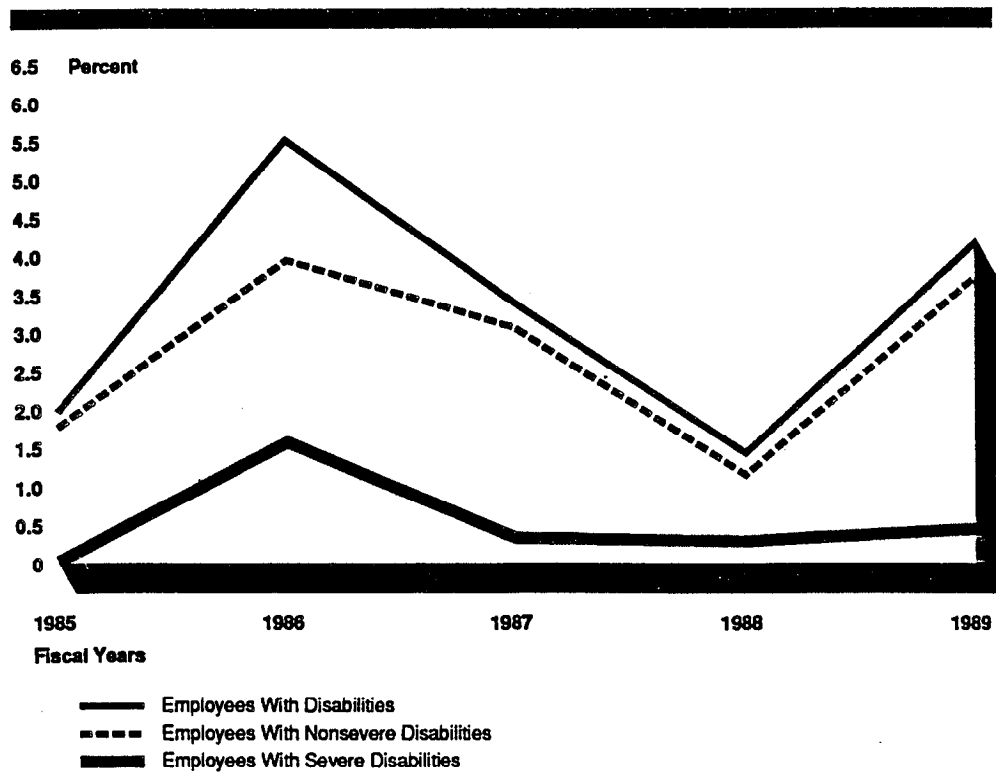
Figure 6.1: GAO Permanent Hires



Source: End-of-fiscal-year payroll data.

Hiring of disabled applicants during this period was also erratic. Disabled persons represented a high of 5.5 percent of all hires in 1986, when hiring activity agencywide was at its lowest point for the period. The hiring rate for disabled persons was the lowest in fiscal year 1988, when only 1.4 percent of all new hires were disabled. An increase in the representation rate among all new hires can be seen in fiscal year 1989 as contrasted with the fiscal year 1988 rate. Representation of new hires with severe disabilities remained exceedingly low, below 0.5 percent during fiscal years 1987-89. This is below the EEOC estimate that the availability of persons with targeted or severe disabilities who are of work force age and are able to work is 5.95 percent of the entire work-force-age population.<sup>1</sup>

Figure 6.2: Representation of Disabled Persons Among Permanent New Hires



See app. VIII for the numbers and the percentages of persons with disabilities among permanent new hires.

Source: End-of-fiscal-year payroll data.

<sup>1</sup>EEOC Management Directive 713, p. B-1.

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GAO also has hired a few disabled persons as temporary employees under the special appointing authorities in GAO Order 2306.1 on selective placement.<sup>2</sup> Selective placement authorities provide for several types of temporary appointments for severely disabled persons. A 700-hour appointment allows severely disabled persons a trial opportunity for employment, and a 2-year temporary appointment provides for continuing employment. Since fiscal year 1985, in all years but fiscal year 1987, up to three employees hired under one of these authorities<sup>3</sup> was employed at GAO. In 1986, no new appointments were made, and in 1985, a high of four people were appointed.<sup>4</sup>

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<sup>2</sup>See discussion on selective placement in ch. 5.

<sup>3</sup>See app. IX for the representation of disabled persons hired under special appointment authority during fiscal years 1985-89.

<sup>4</sup>See app. X for the numbers of new employees hired under one of the special appointment authorities for disabled persons during fiscal years 1985-89.

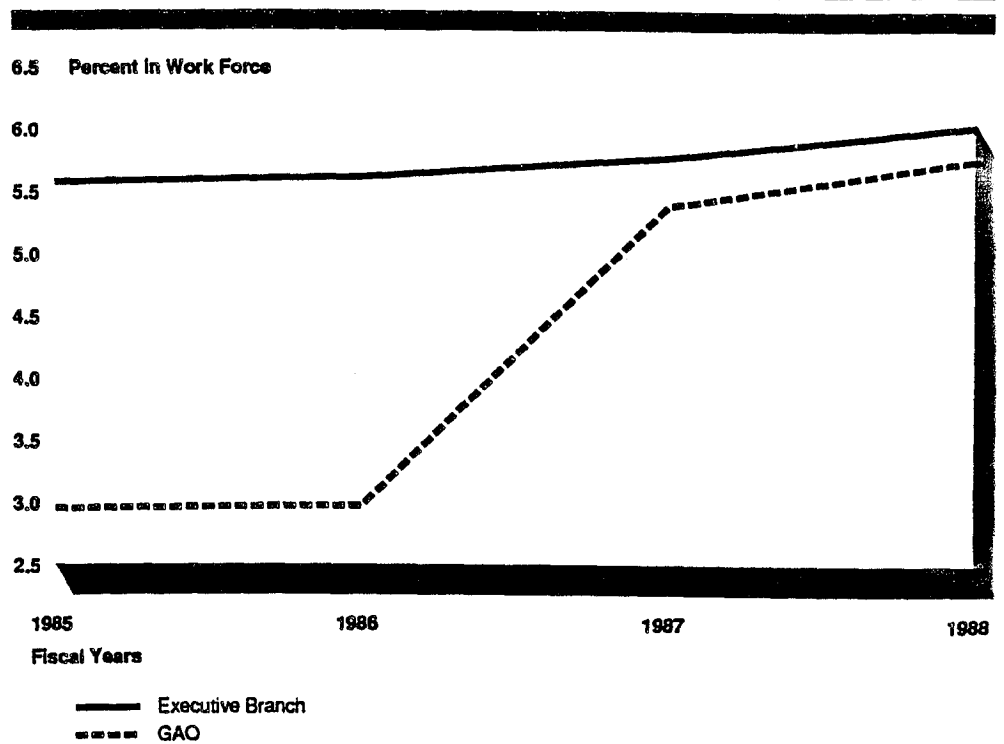


# Comparison Between GAO and the Executive Branch

## Representation Comparison

The percent representation of people with any reported disability in the federal government, including GAO, has increased steadily since 1985. GAO made substantial gains in fiscal year 1987 and narrowed the gap between it and the federal executive branch. GAO remained behind as of fiscal year 1988, the most recent date for which executive branch data<sup>1</sup> were available.<sup>2</sup>

**Figure 7.1: Representation Comparison of All Employees With Disabilities**



Both GAO and executive branch data for fiscal years 1985-87 cover temporary as well as permanent employees. Fiscal year 1988 data for both groups are limited to permanent employees.

<sup>1</sup>Executive branch data in figs. 7.1-7.4 were taken from EEOC's *Annual Report on the Employment of Minorities, Women and People With Disabilities in the Federal Government, Fiscal Year 1988*. GAO data in figs. 7.1-7.4 were taken from end-of-fiscal-year payroll data.

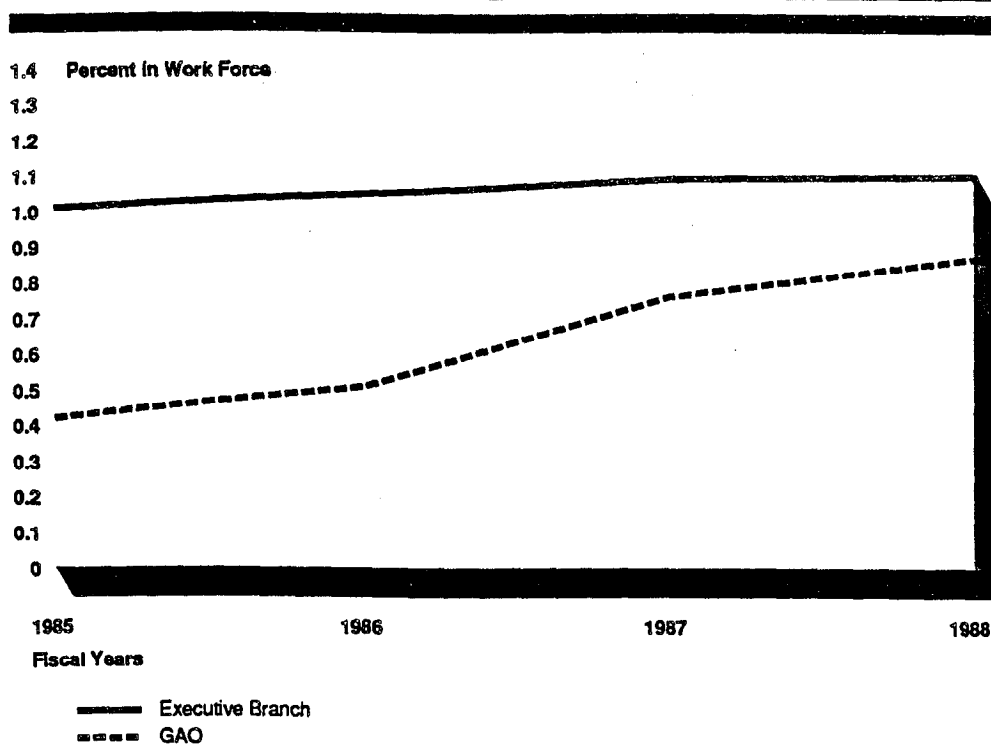
<sup>2</sup>GAO's representation of disabled persons dropped from 5.75 percent in fiscal year 1988 to 5.46 percent in fiscal year 1989.



Chapter 7  
Comparison Between GAO  
and the Executive Branch

Regarding employment of people with severe disabilities, GAO also trailed behind the executive branch in each year during fiscal years 1985-88. GAO increased its representation during fiscal years 1985-88 from 0.42 percent to 0.87 percent. It nevertheless remained, in fiscal year 1988, behind the executive branch, which reported representation at 1.10 percent.

Figure 7.2: Representation Comparison  
Employees With Severe Disabilities

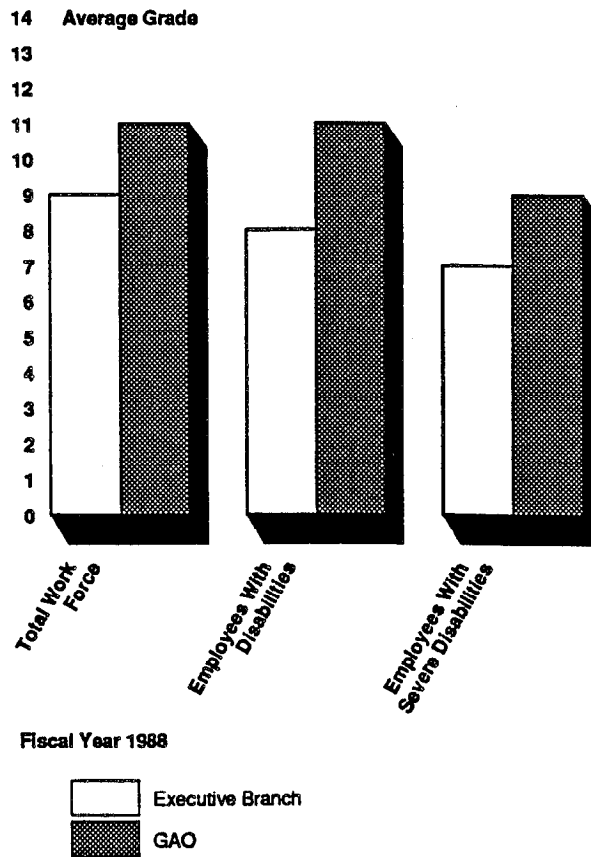


Both GAO and executive branch data for fiscal years 1985-87 cover temporary as well as permanent employees. Fiscal year 1988 data for both groups are limited to permanent employees.

### Grade-Level Comparison

Although GAO has a lower representation of disabled persons than the executive branch, they are likely to fare better from a grade-level perspective if employed at GAO in "white collar" jobs. In fiscal year 1988, the average General Schedule (GS) grade of all executive branch white collar employees was GS-9, while the GAO average grade was GS-11. Similarly, for disabled persons, the average grade for white collar employees in the executive branch was GS-8, while for those at GAO, the average grade was GS-11.

Figure 7.3: White Collar GS Grade Comparison



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- The Training Institute offers no training programs for managers or employees covering the full scope of issues regarding employment of disabled persons.
  - Disabled persons employment has not been fully integrated into the agency's other initiatives in EEO, which focus on sex and race/ethnicity.<sup>3</sup>
  - GAO has generated few program initiatives. Since August of 1988, initiatives have been limited to belatedly reactivating the disabled employees council and encouraging reasonable accommodation for the hearing impaired.
  - The GAO Buildings Access Committee, which was established to set GAO policy on accessibility issues and priorities for removal of physical barriers, has disbanded.

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### Recommendations

The Board recommends that GAO make a visible and meaningful agency commitment to establishing a viable disabled persons program. It specifically recommends the following:

- Establish a high-level position of Disabled Persons Coordinator to achieve what should be GAO's goals.<sup>4</sup> 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.
- Reevaluate 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 improve GAO's image as a "model" employer of the disabled. Input should be obtained from the three

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<sup>3</sup>See, for example, *1989 Annual Report of Key Performance Indicators*, pp. 32-35.

<sup>4</sup>EEOC guidelines applicable to executive branch agencies set forth that "[e]ach agency with 3,000 or more employees should have a full-time handicap program manager at headquarters. . . . This manager may or may not be the person who serves as the selective placement coordinator." (See EEO Management Directive 712, p. 10.)

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.

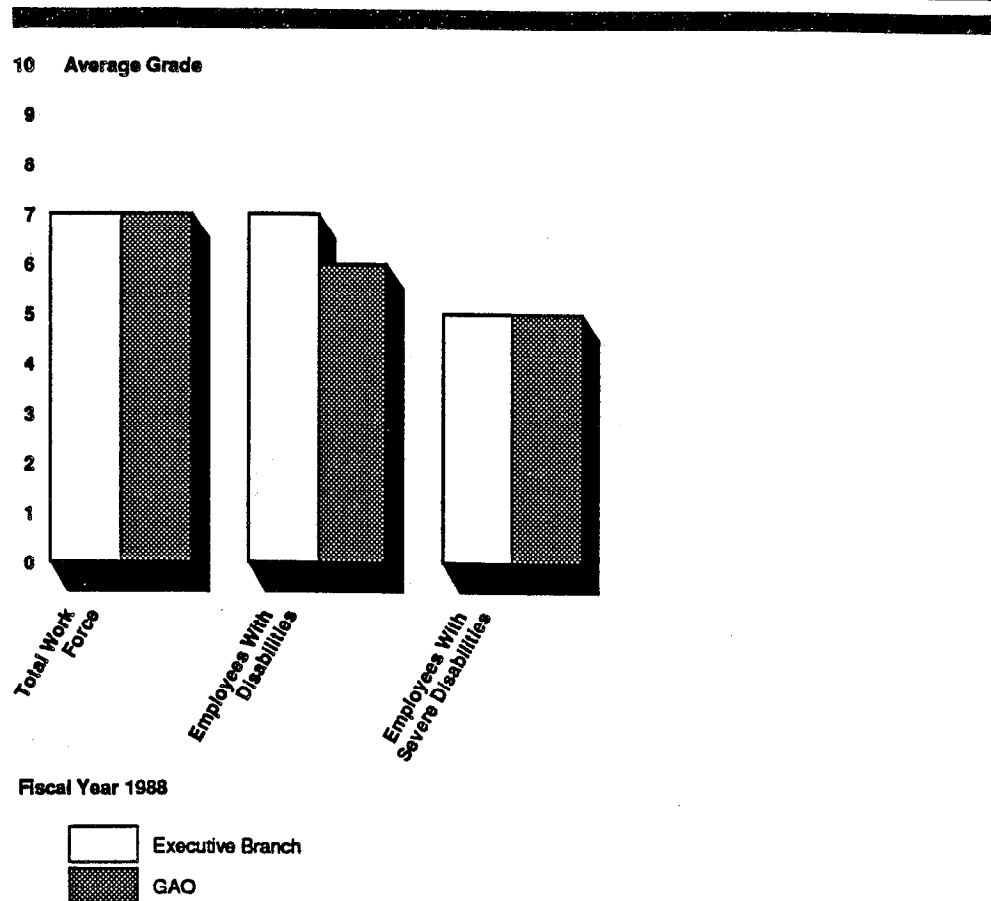
- Develop, approve, and implement, within 60 days after this report is issued, an affirmative action plan for disabled persons. GAO has been without an affirmative action plan for disabled persons since 1985.<sup>5</sup>
- Implement a data system to conduct meaningful program evaluation on recruitment, 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.
- 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.
- 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.

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<sup>5</sup>As this report was being prepared, the PAB Oversight Office was apprised that one was under development by OAAP.

However, in the blue collar area, the average Wage Grade (wg) for all employees in both the executive branch and GAO in fiscal year 1988 was GS-7. Individuals with severe disabilities in both the executive branch and GAO earned an average blue collar grade of wg-5. Only when looking at individuals with any reported disability is there a discrepancy between the executive branch and GAO, with the GAO average Wage Grade slightly behind.

Figure 7.4: Blue Collar Wage Grade Comparison



# Conclusions and Recommendations

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## Conclusions

After 2 years of reviewing GAO's activities to promote the employment of disabled persons, the Board concludes that many problems it has found result from GAO's organizational structure. Regarding employment of disabled persons, EEO and related functions are divided among CRO; OAAP; and OR (and, to a lesser degree, Personnel, Facilities Management, and the Training Institute). No formal avenues of communication exist among these units regarding GAO's efforts to employ disabled persons. No office nor individual exercises overall program and policy responsibility for a GAO disabled persons program. Overall program efforts have not been assumed and are not being carried out.<sup>1</sup> Other conclusions are as follows:

- GAO has failed in its duty to prepare and annually update an affirmative action plan to increase the employment of disabled persons. Data collection efforts have also fallen between the cracks since 1986.
- Without affirmative action goals and objectives and data collection, there can be no internal monitoring, no oversight of GAO's efforts, and no accountability by supervisors for hiring decisions. GAO has no monitoring and accountability systems in place.
- Publicity to employees and managers about a GAO program has been ineffective or nonexistent. CRO's 1985 survey recommended efforts to "increase awareness and visibility of the handicapped program especially in the regional offices." No efforts have been made to carry out this recommendation. For example, GAO undertook no meaningful efforts at headquarters during October 1989 for National Disability Employment Awareness Month (except for distribution to unit heads of posters issued by the President's Committee on Employment of People With Disabilities). Only one regional office planned activities during this time. In contrast, for the 1990 Black History Month, numerous activities were planned at headquarters and in the regions.<sup>2</sup>

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<sup>1</sup>Many program responsibilities are itemized in GAO Order 2306.1, ch. 2, pp. 5-6, and GAO Order 2713.1, ch. 1, para. 5, pp. 2-3.

<sup>2</sup>Compare *Management News*, Vol. 17, No. 24 (Apr. 9-13, 1990), pp. 3-5 (setting forth the GAO-sponsored activities for Black History Month), with *Management News*, Vol. 17, No. 4 (Nov. 13-17, 1989), p. 7 (reporting the GAO-sponsored activities for National Disability Employment Awareness Month).

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

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In sum, a viable and effective GAO disabled persons program must be cut from whole cloth for headquarters and the regions, and it needs to be implemented without delay. The program could be in place and working within 6 months after this report is issued. Such an across-the-board program is long overdue. Because of GAO's cooperation during this review, as well as its known commitment to a leadership role in the government, the Board expects that such a program can and will be developed and implemented by early in the calendar year.



# GAO Form 154: Self-Identification of Medical Disability

United States General Accounting Office

GAO

## Self-Identification of Medical Disability

**Instructions:** Please read the information below and complete both sides of this form.

1. Last Name	First Name	2. Birth Date (mo./yr.)	3. Social Security Number

**4. Definition of Reportable Disability:** A physical or mental disability is NOT determined by a person's ability to perform his or her work but by a disability, or a history of such disability, that is likely to cause the employee to experience difficulty in obtaining, maintaining, or advancing in employment. This definition does not apply solely to an employee's current position but applies to the total career life cycle of that employee. (In the case of multiple disabilities, choose the code that describes the impairment that would most likely result in such difficulties.)

**5. Notice of Authorization**

The Rehabilitation Act of 1973, as amended, 29 U.S.C. §791, et seq., requires federal agencies to establish programs that will facilitate the hiring, the placement, and the advancement of handicapped individuals. The best means of determining GAO's progress in this respect is periodic reports showing such things as the number of handicapped employees hired, promoted, trained, or reassigned over a given period and the percentage of handicapped employees in the work force and in various grades and occupations. Such reports are necessary to inform agency management, the Personnel Appeals Board, the Office of Personnel Management (OPM), the Congress, and the public of the status of programs for employment of the handicapped.

To facilitate the preparation of these reports, GAO needs to collect data on each employee having a disability. The data collected on employees will be used only in preparing reports such as those mentioned above, and not for any purpose that will affect employees individually. Precautions will be taken to ensure that the information provided by employees is prudently handled to respect their privacy.

Participation in the reporting system is entirely voluntary. GAO requests only that those not wishing to provide this information indicate this rather than intentionally miscode themselves, since inaccurate responses seriously damage the statistical value of the reporting system.

When the employees are or were hired under GAO Order 2306.1, "Selective Placement Programs," the Director of Personnel, or his or her designee (a vocational rehabilitation counselor may also be helpful), will help the individuals complete this form and ensure that they fully understand the meaning of the form and the options available to them.

Employees have an opportunity to ensure that the handicap/disability code carried in GAO's and OPM's personnel system is accurate and kept current. They may exercise their rights by asking the Civil Rights Office to identify their codes and provide a definition of the codes. If the codes are incorrect or if their handicapped statuses have changed, employees should contact the Civil Rights Office, which will initiate changes through Personnel.

**Privacy Act Statement**

Disclosure of your social security number is voluntary. The SSN will be used for clear identification of an applicant to avoid any unnecessary delay in the processing of this form. Compliance with this request is appreciated.

OPR: CRO

GAO Form 154 (Rev. 9/89)

Appendix I  
GAO Form 154: Self-Identification  
Of Medical Disability

		Code
<b>Speech Impairments</b>		
Severe speech malfunction or inability to speak, normal hearing (e.g., defects of articulation [unclear language sounds], stuttering, aphasia [impaired language function], laryngectomy [removal of the "voice box"])		13
<b>Hearing Impairments</b>		
Hard of hearing (total deafness in one ear or inability to hear ordinary conversation, correctable with a hearing aid)	Code	Total deafness in both ears, with understandable speech
	15	Total deafness in both ears and unable to speak clearly
<b>Vision Impairments</b>		
Ability to read ordinary-size print with glasses but with loss of peripheral (side) vision (restriction of the visual field to the extent that mobility is affected—"tunnel vision")		Inability to read ordinary-size print, not correctable by glasses (can read oversized print or use assisting devices, such as glass or projector modifier)
	22	Blind in one eye
		Blind in both eyes (no usable vision but may have some light perception)
<b>Missing Extremities</b>		
One hand	27	One leg
One arm	28	Both hands or arms
One foot	29	Both feet or legs
<b>Nonparalytic Orthopedic Impairments</b>		
(Because of chronic pain, stiffness, or weakness in bones or joints, there is some loss of ability to move or use a part or parts of the body.)		
One or both hands	44	Back
One or both feet	45	Any combination of two or more parts of the body
<b>Partial Paralysis</b>		
(Because of a brain, nerve, or muscle problem, including palsy and cerebral palsy, there is some loss of ability to move or use a part of the body, including legs, arms, and/or trunk.)		
One hand	61	One leg, any part
One arm, any part	62	Both hands
<b>Complete Paralysis</b>		
(Because of a brain, nerve, or muscle problem, including palsy and cerebral palsy, there is complete loss of ability to move or use a part of the body, including legs, arms and/or trunk.)		
One hand	70	Both legs
Both hands	71	Lower half of body, including legs
One arm	72	One side of body, including one arm and one leg
<b>Other Impairments</b>		
Heart disease with no restriction or limitation of activity (history of heart problems with complete recovery)	80	Mental retardation (a chronic and lifelong condition involving a limited ability to learn, to be educated, and to be trained for useful productive employment as certified by a state vocational rehabilitation agency)
Heart disease with restriction or limitation of activity	81	Mental or emotional illness (a history of treatment for mental or emotional problems)
Convulsive disorder (e.g., epilepsy)	82	Severe distortion of limbs and/or spine (e.g., dwarfism, kyphosis [severe distortion of back])
Blood diseases (e.g., sickle cell disease, leukemia, hemophilia)	83	Disfigurement of face, hands, or feet (e.g., distortion of features on skin, such as those caused by burns, gunshot injuries, and birth defects [gross facial birthmarks, clubfeet, etc.])
Diabetes	84	Learning disability (a disorder in one or more of the processes involved in understanding, perceiving, or using language or concepts [spoken or written], e.g., dyslexia)
Pulmonary or respiratory disorders (e.g., tuberculosis, emphysema, asthma)	86	
Kidney dysfunctioning (e.g., dialysis [use of an artificial kidney machine] required)	87	
Cancer — a history of cancer with complete recovery	88	
Cancer (undergoing surgical and/or medical treatment)	89	
I do not wish to identify my disability status	01	I have a disability, but it is not listed
I do not have a disability	05	

Enter code here.

# GAO Surveys of Disabled Employees and Their Supervisors



U.S. General Accounting Office  
Civil Rights Office

**SURVEY OF GAO EMPLOYEES NEEDING  
HANDICAPPED PROGRAM SERVICES  
(SURVEY 1)**

Purpose of Survey and Who Should Answer

The Civil Rights Office (CRO) and Personnel Office work with other GAO units to improve the work conditions and opportunities of handicapped staff. As part of this effort, we are conducting surveys of both handicapped employees and their immediate supervisors in order to obtain as complete a picture as possible of the agency's services for the handicapped staff.

We need to reach employees with disabilities who have used or feel that they need Handicapped Program services. Since we have no way of knowing who among us may or may not require services, we are sending this brief questionnaire to all GAO staff who have reported a disability. Your disability must be covered by the definition included later in these instructions. Your responses to the questions contained in this form (Survey 1), tell us whether or not you have used or need Handicapped Program services because of your disability.

We know that we have inadvertently contacted people who reported a disability but do not need services. Also, you may consider your disability not significant or not related to your work situation. In fact, some of you may even have forgotten that you reported a disability and are wondering why we have contacted you. If you are in this group, please answer this brief questionnaire and return this form in one of the enclosed envelopes. Your answers are confidential.

On the other hand, if you have a disability and have used or need Handicapped Program assistance, please return this brief questionnaire (Survey 1), and, in addition, continue to complete Survey 2. Survey 2 asks you about your work-related needs and experiences at GAO.

**REMEMBER:** Please complete both Surveys 1 and 2 if you have used or need Handicapped Program assistance and you have a disability which meets the definition listed below.

Handicapped Program Services:

- \*work space modifications
- \*worksite barriers
- \*building safety and security
- \*job modifications or changes
- \*training, including special training
- \*job assessment, placement, and related employment matters
- \*attitudinal barriers

Definition of Disability:

We are using the definition of handicapped as provided by statute in the Rehabilitation Act of 1973 as amended. The Act defines a handicapped person as an individual with a disability which substantially limits one or more of the person's major life activities such as self care, getting around, working or communication. This includes those who have a history of a disability or are regarded as having a disability. Examples of disabilities include, but are not limited to, the following:

- \*Speech, hearing, or vision impairments
- \*Partial or complete paralysis
- \*Nonparalytic orthopedic impairments
- \*Loss of leg, hand or other body part
- \*Bodily disfigurements and distortions
- \*Kidney, urinary or reproductive disorder
- \*Diseases such as cancer, diabetes and other system disorders
- \*Mental retardation or learning disability
- \*Convulsive disorders such as epilepsy
- \*Mental or emotional illness

**PLEASE NOTE:** At this time we are not surveying persons with alcohol or drug related medical problems.

Appendix II  
CRO Surveys of Disabled Employees  
and Their Supervisors

Confidentiality

Your answers to this questionnaire will be kept strictly confidential.  
We will use the case number on this form to aid in our follow-up efforts, not to associate individuals with their responses. GAO's Program Evaluation and Methodology Division (PEMD) will analyze the results of this survey and send only summary information to the Civil Rights Office.

Should you have any problems or questions, feel free to contact Rudy Charlos of PEMD at 275-3762.

Please return your completed questionnaire in one of the enclosed envelopes addressed to:

Mr. Rudy Charlos  
U.S. General Accounting Office  
PEMD, Room 5844  
441 G Street N.W.  
Washington, D.C. 20548

\*\*\*\*\*  
\* If you need special accommodations to \*  
\* complete your form, please call us. \*  
\*\*\*\*\*

Thank you for your cooperation and assistance. Remember, we cannot fully meet the needs of handicapped GAO employees without your help.

--	--	--	--	--

Case no.

1. Have you ever used the services of the Handicapped Program? (Check one.)

1.  Yes

2.  No

2. Do you feel that your disability may need consideration under the Handicapped Program in the future? (Check one.)

1.  Yes

2.  No

ATTENTION: IF YOU CHECKED "YES" TO EITHER QUESTION 1 OR QUESTION 2, PLEASE CONTINUE TO SURVEY 2. IF YOU CHECKED "NO" TO BOTH QUESTIONS 1 AND 2, STOP HERE AND RETURN SURVEY 1.

REMEMBER: EVERYONE IS TO RETURN THIS QUESTIONNAIRE (SURVEY 1) IN ONE OF THE ENCLOSED ADDRESSED ENVELOPES. THANK YOU.

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U.S. General Accounting Office  
Civil Rights Office

**SURVEY OF HANDICAPPED GAO EMPLOYEES  
(Survey 2)**

Who Should Answer Survey 2

(1-3)

We are asking those employees who have used services of the Handicapped Program or feel they have a disability which may need consideration under the Handicapped Program to complete this second survey. These employees are best qualified to provide information about the degree to which GAO is meeting the needs of handicapped staff. This survey is a continuation of Survey 1 and begins with question 3, where you will start.

To more completely assess services being provided, a similar survey to this one will be mailed to your immediate supervisor. No name can be associated with this similar questionnaire although you will be identified by name to your supervisor in a cover letter.

Anonymity

We realize that many consider a disability to be a very private and sensitive matter, and we wish to respect that concern. For this reason we assure you that participation is voluntary.

There is nothing on the form that can identify you or any other respondent. We ask you to mail back the enclosed post card separately after completing the questionnaire. We need these cards returned so we can remind those who

do not answer. There is no way to link the number on the card with your returned survey. In addition, to ensure the privacy of individual responses, the Program Evaluation and Methodology Division (PEMD) will analyze and aggregate the survey responses into summary form.

The questionnaire can be completed in about 30 minutes. Most questions can be answered by checking a box. However, some questions require a written response.

Should you have any problems or questions as you complete the form, feel free to contact Rudy Chatlos of PEMD at 275-3762.

Please return your completed questionnaire in the second enclosed addressed envelope to:

Mr. Rudy Chatlos  
U.S. General Accounting Office  
PEMD Room 5844  
441 G Street, N.W.  
Washington, D.C. 20548

Thank you for your cooperation and assistance. Remember, we cannot fully meet the needs of handicapped GAO employees without your help.

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3. Which of the following best describes the nature of your handicap? (Check one. If multiply handicapped checked the one which most affects your job performance.) (4-5)

1.  Speech, hearing, or vision impairment
2.  Partial or complete paralysis because of brain, nerve, or muscle problem (e.g. cerebral palsy)
3.  Nonparalytic orthopedic impairment because of pain, stiffness, or weakness in bones or joints (e.g. arthritis)
4.  Loss of leg, hand, or other body part
5.  Bodily disfigurement or distortion
6.  Kidney, urinary, or reproductive disorder
7.  Disease such as cancer, diabetes, or other system disorder
8.  Mental retardation or learning disability
9.  Convulsive disorder such as epilepsy
10.  Mental or emotional illness
11.  Other (Specify.)  
\_\_\_\_\_  
\_\_\_\_\_

4. Which of the following best describes your job at GAO? (Check one.) (6)

1.  Manager or supervisor
2.  Evaluator
3.  Technical or other specialist (Examples are computer analyst, accountant, editor, personnel specialist)
4.  Administrative or clerical support (Examples are clerk typist, file clerk, secretary, claims processor)
5.  Building services or operational support (Examples are mail distribution, copy services, motor vehicle operator or messenger)
6.  Other (Specify.)  
\_\_\_\_\_  
\_\_\_\_\_

5. Are you a disabled veteran? (Check one.) (7)

1.  Yes
2.  No

6. How many years have you worked for GAO? (Round to nearest year. Less than 6 months should be zero.) (8-9)

\_\_\_\_\_ (years)

7. What is your grade? (10-11)

GS- \_\_\_\_\_ (grade)

8. How long have you been in this grade? (Use years and months.) (12-13)

\_\_\_\_\_ (years) (14-15)

\_\_\_\_\_ (months)

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9. Do you currently work part-time or full-time for GAO? (Check one.) (16)

1.  Part-time

2.  Full-time

10. What type of appointment do you have presently at GAO? (Check one.) (17)

1.  Excepted (formerly career)

2.  Excepted-conditional (formerly career-conditional)

3.  Two-year noncompetitive temporary handicapped

4.  700-hour handicapped

5.  Unpaid work experience

6.  Co-op student

7.  Other (Specify.) \_\_\_\_\_

SPECIAL EQUIPMENT

11. Because of your handicap, do you use any special equipment to help you do your job? Examples are a modified computer keyboard, telephone devices for the deaf, or porta readers to enlarge printed material. (18)

1.  Yes (CONTINUE)

2.  No (GO TO QUESTION 13)

12. Please describe this special equipment and indicate whether it was purchased by GAO. (19)

13. Do you need any special equipment to help you do your job which you don't have at this time? (20)

1.  Yes (CONTINUE)

2.  No (GO TO QUESTION 15)

14. Describe the special equipment you need. (21)

WORK SCHEDULE

15. Do you now use a special work schedule other than provided through flextime? (Check one.) (22)

1.  Yes (GO TO QUESTION 18)

2.  No (CONTINUE)

16. If you are not using a special work schedule at this time, do you need such arrangements because of your handicap? (Check one.) (23)

1.  Yes (CONTINUE)

2.  No (GO TO QUESTION 18)

17. Briefly describe your need and why you haven't been able to start a special work schedule. (Please explain) (24)

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WORK SPACE MODIFICATIONS

18. Has your work space (office) been modified to meet your needs?  
Examples are changing shelf or desk heights or providing you a larger work space. (Include changes which are in process.) (Check one.) (25)
1.  Yes (CONTINUE)
2.  No (GO TO QUESTION 20)
19. Describe any changes to your work space which have been made or are now being made. (26)
20. Do you need any modification to your work space at this time?  
(Check one.) (27)
1.  Yes (CONTINUE)
2.  No (GO TO QUESTION 22)
21. Describe any changes you need to your work space. (28)

WORKSITE OBSTACLES

22. In which of the following locations do you now work? (Check one.) (29)
1.  Headquarters building
2.  Washington area other than GAO headquarters building (Specify.)  
\_\_\_\_\_
3.  Regional Office other than WRO (Specify.)  
\_\_\_\_\_
4.  Other (Specify.)  
\_\_\_\_\_  
\_\_\_\_\_
23. Are there any obstacles which are unsafe or make it difficult for you to carry out your job or get around the building in which you work?  
(Examples are narrow doorways, location of restrooms, fire safety hazards, parking and security problems.) (Check one.) (30)
1.  Yes (CONTINUE)
2.  No (GO TO QUESTION 25)
24. Describe any worksite obstacles you have found in the building in which you work. (31)



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JOB MODIFICATIONS OR CHANGES

25. Have any of your job duties been changed to accommodate your handicap? Examples are assigning a deaf secretary to duties in a typing pool rather than to an assignment requiring telephone work, or modifying travel duties of evaluators. (Check one.) (32)

- 1.  Yes (CONTINUE)
- 2.  No (GO TO QUESTION 27)

26. Describe any modifications which have been made to your job duties. (33)

27. Do you need to have adjustments made to your job duties at this time because of your handicap? (Check one.) (34)

- 1.  Yes (CONTINUE)
- 2.  No (GO TO QUESTION 29)

28. Describe any adjustments which you believe need to be made to your job duties at this time. (35)

30. Sometimes it is not possible for managers to meet the needs of handicapped persons while at other times arrangements can be made to help. In any case, managers must try to meet your needs and fully explain what can or cannot be done. Overall, how satisfied are you, if at all, with the efforts managers have made in regard to meeting each of the following needs? (Check one box for each row item.) (37-42)

	1	2	3	4	5	6
1. Special equipment						
2. Work schedule						
3. Job changes						
4. Work space modifications						
5. Worksite obstacles						
6. Other (Specify)						

CONTINUE IF YOU CHECKED MODERATELY OR VERY DISSATISFIED ON ANY ITEM ABOVE. OTHERWISE, GO TO QUESTION 32.

ASSISTANCE WITH PROBLEMS

29. Have you contacted your supervisor or other managers about special equipment you need, changes needed to your work schedule, job or work space modifications, obstacles which exist at your worksite, or other matters? (Check one.) (36)

- 1.  Yes (CONTINUE)
- 2.  No (GO TO QUESTION 32)

31. Please explain the reason or reasons for your dissatisfaction. (43)

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TRAINING

32. Relative to others, do you think you have received all of the training opportunities normally associated with your position in GAO? (Check one.) (44)

1.  Yes (GO TO QUESTION 34)
2.  No (CONTINUE)
3.  Do not know (Explain)

\_\_\_\_\_  
\_\_\_\_\_  
(GO TO QUESTION 34)

33. Describe those training opportunities normally associated with your position in GAO which you have not received. (45)

34. Are there any specialized training opportunities (either related to your handicap or not related) which you believe you need to improve your job performance or increase your chances of getting promoted at GAO? (46)

1.  Yes
2.  No

35. Describe these special training needs. (47)

JOB PERFORMANCE AND JOB GROWTH

36. Do you have a written individual development plan (IDP)? (Check one.) (48)

1.  Yes (CONTINUE)
2.  No (GO TO QUESTION 38)

37. During the last year, did your supervisor discuss or update your individual development plan (IDP) with you? (Check one.) (49)

1.  Yes
2.  No

38. In your opinion, in general, how accurately or inaccurately did your last rating reflect your job performance? (Check one.) (50)

1.  Very accurate reflection of my performance
2.  Somewhat accurate reflection of my performance
3.  Neither accurate nor inaccurate reflection of my performance
4.  Somewhat inaccurate reflection of my performance
5.  Very inaccurate reflection of my performance

39. Consider your performance in comparison to other people in your office or division. In your opinion, how fair or unfair (equitable or not) do you think your last rating was? (Check one.) (51)

1.  Very fair
2.  Somewhat fair
3.  Neither fair nor unfair
4.  Somewhat unfair
5.  Very unfair

IF YOU CHECKED YOUR LAST RATING AS SOMEWHAT OR VERY INACCURATE (Q. 38) OR SOMEWHAT OR VERY UNFAIR (Q. 39), CONTINUE. OTHERWISE, GO TO Q. 42.

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40. If you felt that your rating was inaccurate or unfair (You checked 4 or 5 in Questions 38 or 39), did you take some type of action, such as discussing your concerns with your supervisor or stating them in writing? (Check one.) (52)

- 1.  Yes (GO TO QUESTION 42)
- 2.  No (CONTINUE)

41. Why did you decide not to take some type of action? (Check all that apply.) (53-57)

- 1.  Did nothing because I didn't know what actions I could take
- 2.  Did nothing because I felt my rating would not be changed or my job situation would not improve
- 3.  Reluctant to take action because it might make my situation at work worse
- 4.  Reluctant to take action because I'm handicapped
- 5.  Other (Specify.)  
\_\_\_\_\_  
\_\_\_\_\_

42. How would you rate your chance to advance to a job at the next higher level as compared to the typical nonhandicapped person doing similar quality work in a position like yours? (Check one.) (58)

- 1.  Significantly better
  - 2.  Somewhat better
  - 3.  About the same
  - 4.  Somewhat poorer
  - 5.  Significantly poorer
- } (GO TO QUESTION 44)
- } (CONTINUE)

43. Please explain the reason or reasons why you rate your chance to advance as poorer. (59)

PERSONAL INTERACTION

44. Some handicapped individuals may find it difficult to interact openly and freely with nondisabled co-workers, including their supervisors. To what extent, if at all, have you experienced this difficulty? (Check one.) (60)

- 1.  Very great extent
- 2.  Substantial extent
- 3.  Moderate extent
- 4.  Some extent
- 5.  Little or no extent

45. Some nonhandicapped individuals may find it difficult to interact openly and freely with handicapped co-workers. To what extent, if at all, have you observed that other GAO employees have had difficulty interacting with you? (61)

- 1.  Little or no extent
- 2.  Some extent
- 3.  Moderate extent
- 4.  Substantial extent
- 5.  Very great extent

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CONTACTS WITH THE PERSONNEL OFFICE AND THE CIVIL RIGHTS OFFICE (CRO)

Both the Personnel Office and CRO are responsible for promoting the objectives of the Handicapped Program GAO-wide. The offices share some responsibilities as well as handling different parts of the program. The following questions ask about assistance you received from each of these offices and how satisfied or not you were with their services.

46. Have you contacted the Personnel Office or CRO to get assistance on matters related to your job and/or your handicap? (Check one.) (62)

1.  Yes (CONTINUE)
2.  No (GO TO QUESTION 50)

47. Listed below are various types of assistance offered by the Personnel Office and CRO as part of the Handicapped Program. Which of these did you ask for, and overall, how satisfied or dissatisfied were you with the help you got? (Check one box for each row. Check box 6 if you did not ask for the assistance listed.)

Type of Assistance Asked	Satisfaction Level						
	1	2	3	4	5	6	
1. Job modifications or job restructuring							(63)
2. Work space changes or worksite obstacles							(64)
3. Special equipment							(65)
4. Training							(66)
5. Career development or performance appraisal							(67)
6. Attitudinal barriers or discrimination							(68)
7. Counseling							(69)
8. Other (Specify.)							
1.) _____							(70)
2.) _____							(71)
3.) _____							(72)

**CONTINUE IF YOU WERE MODERATELY OR VERY DISSATISFIED WITH ANY ASSISTANCE YOU RECEIVED FROM THE PERSONNEL OFFICE OR CRO. OTHERWISE, GO TO QUESTION 49.**

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48. For what reason or reasons were you dissatisfied with the assistance you received? (Please describe.) (73)

ADDITIONAL COMMENTS

50. If you have any additional comments related to matters included in this questionnaire or matters related to GAO's program for handicapped employees, please use the space below. You may add additional sheets if necessary. (84)

49. For each type of assistance you asked for, where did you go for help, to the Personnel Office or to CRO? (Check all offices that apply. Check box 3 if you're not sure or can't recall.)

Type of Assistance	Personnel Office	CRO	Not sure/ can't recall	
	1	2	3	
1. Job modifications or job restructuring				(74)
2. Work space changes or worksite obstacles				(75)
3. Special equipment				(76)
4. Training				(77)
5. Career development or performance appraisal				(78)
6. Attitudinal barriers or discrimination				(79)
7. Counseling				(80)
8. Other (Specify.)				
1.) _____				(81)
2.) _____				(82)
3.) _____				(73)

THANK YOU FOR YOUR HELP. PLEASE REMEMBER TO RETURN YOUR COMPLETED SURVEY IN THE SECOND ENCLOSED ADDRESSED ENVELOPE. RETURN THE POST CARD SEPARATELY.

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U.S. GENERAL ACCOUNTING OFFICE  
CIVIL RIGHTS OFFICE

**SURVEY OF SUPERVISORS OF  
HANDICAPPED GAO EMPLOYEES**

PURPOSE OF SURVEY

The Civil Rights Office (CRO) and Personnel Office work with other GAO units to improve the work conditions and opportunities of handicapped individuals. As part of this effort, we are surveying both handicapped individuals and their immediate supervisors in order to obtain as complete a picture as possible of the agency's services for handicapped staff.

The purpose of this questionnaire is to obtain information from supervisors on the extent to which GAO is meeting the needs of handicapped staff. We are focusing on employees with a disability who have used or who need assistance from GAO's Handicapped Program. This program provides assistance in the following areas:

- °work space modifications
- °worksite barriers
- °building safety and security
- °job modifications or job restructuring
- °training, including special training
- °job assessment, placement and related employment matters
- °attitudinal barriers

Since we have no way of knowing which employees need these services, we contacted all GAO staff who reported a disability to locate the appropriate employee group. Also, to ensure that we adequately assess the needs of the handicapped, we are surveying supervisors. Accordingly, we asked each division and office to help us identify the immediate supervisors of staff who fit the criteria of this study.

Please complete this anonymous survey in reference to the handicapped employee listed on the transmittal letter accompanying this form. We have been told you directly supervise this employee. This employee has indicated he or she has either used or feels need for the types of Handicapped Program assistance listed earlier. In addition, the employee reported a physical or mental disability which met the definition of handicapped as provided by statute in the Rehabilitation Act 1973 as amended. Disabilities covered by the Act include, but are not limited to, the following:

- °Speech, hearing, or vision impairments
- °Partial or complete paralysis
- °Nonparalytic orthopedic impairments
- °Loss of leg, hand or other body part
- °Bodily disfigurements and distortions
- °Kidney, urinary or reproductive disorders
- °Diseases such as cancer, diabetes and other system disorders
- °Mental retardation or learning disability
- °Convulsive disorders such as epilepsy
- °Mental or emotional illnesses

**PLEASE NOTE:** At this time we are not including employees with alcohol or drug related medical problems.

(1-3)

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ANONYMITY

We realize that many consider a disability to be a very private and sensitive matter, and we wish to respect that concern. For this reason this questionnaire is anonymous and, of course, participation is voluntary. There is nothing on the form that can identify you or the handicapped employee you submit the survey for. We ask that you mail back the enclosed post card separately after completing the questionnaire. We need these cards returned so that we can remind those who do not answer. There is no way to link the number on the post card with your returned survey. In addition, to ensure the privacy of individual responses, the Program Evaluation and Methodology Division (PEMD) will analyze and aggregate the survey responses into summary form. All responses will be summarized in such a way that individuals cannot be identified.

The questionnaire can be completed in about 20 minutes. Most questions can be answered by checking a box. However, some questions require a written response.

Should you have any problems or questions as you complete the questionnaire, feel free to contact PEMD staff member Rudy Chatlos at 275-3762.

Please return your completed questionnaire in the enclosed addressed envelope to:

Mr. Rudy Chatlos  
U.S. General Accounting Office  
PEMD Room 5844  
441 G Street, N.W.  
Washington, D.C. 20548

Thank you for your cooperation and assistance. Remember, we cannot fully meet the needs of handicapped GAO employees without your help.

SUPERVISOR'S BACKGROUND

1. Do you have a disability as defined in the instructions? Also, have you used or do you need assistance from the Handicapped Program? (Check one.) (4)

1.  Do not have a disability
2.  Have a disability and have used or need Handicapped Program
3.  Have a disability, but have not used nor do I need Handicapped Program assistance

2. In which of the following locations do you now work? (Check one.) (5)

1.  Headquarters building
2.  Washington area other than GAO headquarters building (Specify.) \_\_\_\_\_

3.  Regional office other than WRO (Specify.) \_\_\_\_\_

4.  Other (Specify.) \_\_\_\_\_

3. How long have you worked in a direct supervisory capacity with this particular handicapped employee? (6-9)

(years) (months)

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EMPLOYEE'S BACKGROUND

4. What type of position does the handicapped employee hold at GAO? (Check one.) (10)
1.  Manager or supervisor
  2.  Evaluator
  3.  Technical or other specialist (Examples are computer analyst, accountant, editor, personnel specialist)
  4.  Administrative or clerical support staff (Examples are clerk-typist, secretary, claims processor)
  5.  Building services or operational support staff (Examples are mail distribution, copy services, motor vehicle operator or messenger)
  6.  Other (Specify.)  
\_\_\_\_\_  
\_\_\_\_\_

5. Which of the following best describes the nature of the employee's handicap? (Check one.) (Check box 12 if you are not sure or don't know.) (11-12)

1.  Speech, hearing, or vision impairment
2.  Partial or complete paralysis because of brain, nerve, or muscle problems (e.g. cerebral palsy)
3.  Nonparalytic orthopedic impairment because of pain, stiffness, or weakness in bones or joints (e.g. arthritis)
4.  Loss of leg, hand, or other body part
5.  Bodily disfigurement or distortion
6.  Kidney, urinary, or reproductive disorder
7.  Disease such as cancer, diabetes, or other system disorder
8.  Mental retardation or learning disability
9.  Convulsive disorder such as epilepsy
10.  Mental or emotional illness
11.  Other (Specify.)  
\_\_\_\_\_
12.  Not sure/don't know

WORK SPACE MODIFICATIONS

6. Has the employee's work space (office) been modified to accommodate his/her condition? Examples are changing shelves or desk heights or providing a larger work space. (Include modifications in process.) (Check one.) (13)
1.  Yes (CONTINUE)
  2.  No (GO TO QUESTION 8)



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7. Please describe any modifications which have been made to the employee's work space or are now being made. (14)

8. Are any modifications to the employee's work space currently needed? (Check one.) (15)

1.  Yes (CONTINUE)

2.  No } (GO TO QUESTION 10)

3.  Don't know } 10)

9. Please describe the modifications that are currently needed. (16)

SPECIAL EQUIPMENT

10. Does the employee use any special equipment to do his/her job? (Examples are a modified computer keyboard, telephone devices for the deaf or "porta-readers" to enlarge printed material.) (17)

1.  Yes (CONTINUE)

2.  No (GO TO QUESTION 12)

11. Please describe this special equipment and indicate, if known, whether it was purchased by GAO. (18)

12. Is any special equipment currently needed by the employee? (Check one.) (19)

1.  Yes (CONTINUE)

2.  No } (GO TO QUESTION 14)

3.  Don't know }

13. Please describe the equipment the employee needs. (20)

WORKSITE OBSTACLES

14. Are there any obstacles which are unsafe or make it difficult for the employee to carry out his/her job or get around the building in which you and the employee work? (Examples are narrow doorways, location of restrooms, fire safety hazards, parking and security problems) (Check one.) (21)

1.  Yes (CONTINUE)

2.  No (GO TO QUESTION 16)

15. Describe any worksite obstacles you have found in your building. (22)

WORK SCHEDULE

16. Does the employee use a special work schedule other than provided through flex time? (Check one.) (23)

1.  Yes (GO TO QUESTION 19)

2.  No (CONTINUE)

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17. Do you think that a special work schedule other than flex time is needed? (Check one.) (24)

1.  Yes (CONTINUE)

2.  No } (GO TO QUESTION 19)

3.  Not sure/  
can't say }

18. Briefly describe the need and why a special work schedule hasn't been started? (Please explain.) (25)

JOB RESTRUCTURING OR MODIFICATIONS

19. Have elements of the employee's job been restructured or modified to permit the employee to perform his/her essential functions? (Examples are assigning a secretary to typing pool duties rather than to an assignment requiring telephone work or modifying travel duties of evaluators.) (Check one.) (26)

1.  Yes (CONTINUE)

2.  No (GO TO QUESTION 21)

20. Please describe any job changes which have occurred. (27)

21. In your opinion, is some type of job modification or job restructuring needed? (Check one.) (28)

1.  Yes (CONTINUE)

2.  No (GO TO QUESTION 23)

22. Please describe any job modifications or restructuring that is needed. Also, what problems, if any, might there be in implementing job changes? (29)

TRAINING

23. Relative to others, is the employee receiving all the training opportunities normally associated with the position he/she occupies? (Check one.) (30)

1.  Yes (GO TO QUESTION 25)

2.  No (CONTINUE)

24. What training needs normally associated with the position are not being received? Also, in your opinion, what accounts for this? (Please explain.) (31)

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25. Are there any special training opportunities (either related or not related to a handicap) needed by this employee to improve job performance or to increase chances of getting promoted at GAO? (Consider training specifically aimed at overcoming or reducing the impact of the handicap at work. Include retraining for staff whose condition developed after coming to work at GAO) (32)

- 1.  Yes (CONTINUE)
- 2.  No (GO TO QUESTION 27)

26. Please describe these needed training opportunities. (33)

CAREER DEVELOPMENT

28. Does the employee have a written individual development plan (IDP)? (Check one.) (34)

- 1.  Yes (CONTINUE)
  - 2.  No
  - 3.  Don't know
- } (GO TO QUESTION 29)

28. During the last year, did you discuss or update the individual development plan with the employee? (Check one.) (35)

- 1.  Yes
  - 2.  No
- } (GO TO QUESTION 30)

29. What is the main reason why an individual development plan hasn't been implemented? (Check one.) (36)

- 1.  A plan would not be appropriate
  - 2.  Employee not interested
  - 3.  Haven't had the opportunity
  - 4.  Other (Specify.)
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

30. How would you rate this employee's chance to advance to a job at the next higher level as compared to the typical non-handicapped person doing similar quality work and in the same type of position? (Check one.) (37)

- 1.  Significantly better
  - 2.  Somewhat better
  - 3.  About the same
  - 4.  Somewhat poorer
  - 5.  Significantly poorer
- } (GO TO QUESTION 32)
- } (CONTINUE)

31. Please explain the reason or reasons why you rate this employee's chance to advance as poorer. (38)

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PERSONAL INTERACTION

32. Some nondisabled persons may find it difficult to interact openly and freely with handicapped staff. As a supervisor, to what extent, if at all, have you experienced difficulty interacting with the handicapped employee? (Check one.) (Check box 6 if you are a supervisor with a handicap.) (39)

- |   |   |                     |
|---|---|---------------------|
| 1. <input type="checkbox"/> Very great extent   | } | (CON-<br>TIN<br>UE) |
| 2. <input type="checkbox"/> Substantial extent  |   |                     |
| 3. <input type="checkbox"/> Moderate extent     |   |                     |
| 4. <input type="checkbox"/> Some extent         |   |                     |
| 5. <input type="checkbox"/> Little or no extent |   |                     |

6.  Not applicable since I am handicapped (GO TO QUESTION 34)

33. Some handicapped individuals may find it difficult to interact openly and freely with nondisabled co-workers, including their supervisors. To what extent, if at all, have you noticed that this employee has had this difficulty? (Check one.) (40)

1.  Little or no extent
2.  Some extent
3.  Moderate extent
4.  Substantial extent
5.  Very great extent

CONTACTS WITH THE PERSONNEL OFFICE AND  
CIVIL RIGHTS OFFICE (CRO)

Both the Personnel Office and CRO are responsible for promoting the objectives of the Handicapped Program GAO-wide. The offices share some responsibilities as well as handling different parts of the program. The following questions ask about assistance you received from each of these offices and how satisfied or not you were with the services.

34. Have you contacted GAO's Personnel Office or CRO to get assistance for the handicapped employee you supervise? (41)

1.  Yes (CONTINUE)
2.  No (GO TO QUESTION 38)

Appendix II  
 CRO Surveys of Disabled Employees  
 and Their Supervisors

35. Listed below are various types of assistance offered by the Personnel Office and CRO as part of the Handicapped Program. Which of these did you ask for, and overall, how satisfied or dissatisfied were you with the help you got? (Check one box for each row. Check box 6 if you did not ask for the assistance listed.)

Types of Assistance Asked For	Very satisfied Moderately satisfied Neither nor satisfied Moderately dissatisfied Very dissatisfied Does not apply to me						
	1	2	3	4	5	6	
1. Job modifications or job re- structuring							(42)
2. Work space changes or worksite obstacles							(43)
3. Special equipment							(44)
4. Training							(45)
5. Career development or perfor- mance appraisal							(46)
6. Attitudinal barriers or dis- crimination							(47)
7. Counseling							(48)
8. Other (Specify.)							
1.) _____							(49)
2.) _____							(50)
3.) _____							(51)

**CONTINUE IF YOU WERE MODERATELY OR VERY DISSATISFIED WITH ANY ASSISTANCE YOU RECEIVED FROM THE PERSONNEL OFFICE OR CRO. OTHERWISE, GO TO QUESTION 38.**

36. For what reason or reasons were you dissatisfied with the assistance you received? (Please describe.) (52)

Appendix II  
 CRO Surveys of Disabled Employees  
 and Their Supervisors

37. For each type of assistance you asked for, where did you go for help, to the Personnel Office or to CRO? (Check all offices that apply. Check box 3 if you're not sure or can't recall.)

Types of Assistance Asked For	Personnel office	CRO	Not Sure/ Can't recall	
	1	2	3	
1. Job modifications or job restructuring				(53)
2. Work space changes or worksite obstacles				(54)
3. Special equipment				(55)
4. Training				(56)
5. Career development or performance appraisal				(57)
6. Attitudinal barriers or discrimination				(58)
7. Counseling				(59)
8. Other (Specify.)				
1.) _____				(60)
2.) _____				(61)
3.) _____				(62)

COMMENTS

38. Thank you for your assistance in this survey. If you wish to comment on any questions in this survey or on other concerns with regard to handicapped employees at GAO, please write them below. (63)

wrc 5/85

# PAB Survey of Disabled Employees at GAO



## PERSONNEL APPEALS BOARD

United States General Accounting Office  
Washington, D.C. 20548  
(202) 275-6137

### Board Members

Jessie James, Jr., Chair  
Isabelle R. Cappello  
Roger P. Kapian  
Jonathan E. Kaufmann  
Paul A. Weinstein

October 20, 1988

### MEMORANDUM

**TO:** GAO Employees Who Have Designated Themselves as Having a Disability

**FROM:** Beth L. Don *BLD*  
EEO Oversight  
Personnel Appeals Board

**SUBJECT:** Questionnaire

The Personnel Appeals Board EEO Oversight for this year will include a functional study of disabled persons at GAO. As employees who have self designated themselves as disabled persons, we are seeking your participation in this study. You clearly are the people with the most firsthand and relevant information on how GAO's practices and policies affect you as individuals, as well as how they affect disabled persons as a group. Our object is to conduct an in depth study, one that will benefit you and GAO. We want to find out which of GAO's practices and policies are having positive results with regard to disabled employees and applicants as well as discovering which practices and policies need modification in order to become more positive in nature. Where the system is not as effective as it could be, we want to be able to suggest the changes that will lead to an improved system.

The attached questionnaire is as inclusive as we could devise. If there are additional areas which you would like to address, please feel free to do so. If you have any questions, you may call me at the Board. I can be reached at 275-3913 or 275-6137. If you wish assistance in responding to the questionnaire, please contact me and I will try and provide you with whatever assistance is required. It is important to the study, but even more important to the agency and its employees, that we get as much feedback as possible. I would appreciate receiving your responses to the questionnaire by November 15. Thank you.

Appendix III  
PAB Survey of Disabled  
Employees at GAO

1. NAME \_\_\_\_\_
2. GRADE \_\_\_\_\_
3. JOB SERIES \_\_\_\_\_
4. AGE \_\_\_\_\_
5. RACE \_\_\_\_\_
6. SEX \_\_\_\_\_
7. EDUCATION  
HIGHEST GRADE COMPLETED IN SCHOOL \_\_\_\_\_  
NAME OF HIGH SCHOOL & YEAR OF GRADUATION \_\_\_\_\_  
NAME OF COLLEGE, YEAR OF GRADUATION, MAJOR & DEGREE \_\_\_\_\_  
\_\_\_\_\_  
NAME OF GRADUATE SCHOOL, YEAR OF GRADUATION, MAJOR & DEGREE  
\_\_\_\_\_
8. FROM THE ATTACHED LIST, SELECT THE DESIGNATION THAT BEST  
DESCRIBES YOUR DISABILITY. \_\_\_\_\_
9. HOW LONG HAVE YOU BEEN DISABLED? \_\_\_\_\_
10. MILITARY SERVICES? \_\_\_\_\_  
IF SO, HOW MANY YEARS? \_\_\_\_\_  
WHAT RANK? \_\_\_\_\_
11. YEARS OF FEDERAL SERVICE (INCLUDING GAO) \_\_\_\_\_
12. HOW LONG AT GAO? \_\_\_\_\_
13. DATE OF LAST PROMOTION \_\_\_\_\_
14. FOR THE PAST THREE YEARS PLEASE STATE HOW YOU WERE RATED ON  
YOUR OVERALL PERFORMANCE EVALUATION.  
1988 \_\_\_\_\_  
1987 \_\_\_\_\_  
1986 \_\_\_\_\_



15. DID GAO RECRUIT YOU? IF SO, PLEASE GIVE DETAILS. IF NOT, PLEASE EXPLAIN HOW YOU CAME TO WORK AT GAO.
  
16. IN WHAT WAY(S) HAS GAO ACCOMMODATED YOUR DISABILITY? PLEASE EXPLAIN.
  
17. HAVE YOU REQUESTED ACCOMMODATIONS FROM GAO THAT IT HAS DENIED AND/OR NOT IMPLEMENTED? PLEASE EXPLAIN.
  
18. DO YOU THINK THAT GAO MAKES AS GREAT AN EFFORT TO RETAIN DISABLED EMPLOYEES AS IT DOES TO RETAIN SIMILARLY SITUATED NON-DISABLED EMPLOYEES? PLEASE EXPLAIN.
  
19. IS YOUR BUILDING ACCESSIBLE FROM THE STREET? IF NOT, PLEASE EXPLAIN.
  
20. IF YOUR BUILDING HAS A CAFETERIA, IS IT FULLY ACCESSIBLE? IF NOT, PLEASE EXPLAIN.
  
21. ARE YOUR BUILDING(S)' RESTROOM FACILITIES FULLY ACCESSIBLE? IF NOT, PLEASE EXPLAIN.

22. ARE YOUR BUILDING(S)' WATER-FOUNTAINS ACCESSIBLE? IF NOT, PLEASE EXPLAIN.
23. ARE YOUR BUILDING(S)' PUBLIC TELEPHONE ACCESSIBLE: IF NOT PLEASE EXPLAIN.
24. IS YOUR WORK SPACE ACCESSIBLE? CAN YOU REACH SHELVES, DRAWERS, ETC? CAN YOU USE THE FILE CABINETS?
25. IF YOUR LIBRARY FULLY ACCESSIBLE? IF NOT, PLEASE EXPLAIN.
26. DOES YOUR BUILDING HAVE AMPLE DISABLED PARKING?
27. DOES GAO USE A VAN OR OTHER VEHICLE FOR SHUTTLE TYPE SERVICE? IF SO, IS IT EQUIPPED TO ACCOMMODATE THE DISABLED?
28. DOES GAO PROVIDE YOU WITH EFFECTIVE MEANS TO RESOLVE AREAS OF CONCERN TO THE DISABLED EMPLOYEE? PLEASE EXPLAIN.

29. HAVE YOU RECEIVED COMPARABLE TRAINING TO NON-DISABLED PERSONS THAT WOULD ENABLE YOU TO COMPETE ON AN EQUAL BASIS WITH NON DISABLED PERSONS FOR AWARDS AND/OR PROMOTION? PLEASE EXPLAIN.
30. HAVE YOU RECEIVED COMPARABLE JOB ASSIGNMENTS TO NON DISABLED PERSONS THAT WOULD ENABLE YOU TO COMPETE ON AN EQUAL BASIS WITH THE NON DISABLED PERSONS FOR AWARDS AND/OR PROMOTIONS? PLEASE EXPLAIN.
31. WHAT AREA OR AREAS AT GAO WOULD YOU SUGGEST TO THE BOARD SHOULD BE REVIEWED AS PART OF ITS STUDY ON DISABLED PERSONS AT GAO. PLEASE EXPLAIN.
32. WOULD YOU BE WILLING TO BE INTERVIEWED BY SOMEONE FROM THE BOARD AS PART OF THE EEO OVERSIGHT?

**SPEECH IMPAIRMENTS**

1. Severe speech malfunction or inability to speak; hearing is normal (Examples defects of articulation [unclear language sounds];, stuttering; aphasia [impaired language function]; laryngectomy [removal of the "voice box"]).

**HEARING IMPAIRMENTS**

2. Hard of hearing (Total deafness in one ear or inability to hear ordinary conversation, correctable with a hearing aid)
3. Total deafness in both ears, with understandable speech
4. Total deafness in both ears, and unable to speak clearly

**VISION IMPAIRMENTS**

5. Ability to read ordinary size print with glasses, but with lost of peripheral (side) vision (Restriction of the visual field to the extent that mobility is affected-"Tunnel vision")
6. Inability to read ordinary size print, not correctable by glasses (Can read oversized print or use assisting devices such as glass or projector modifier)
7. Blind in one eye
8. Blind in both eyes (No usable vision, but may have some light perception)

**MISSING EXTREMITIES**

9. One hand
10. One arm
11. One foot
12. One leg
13. Both hands or arms

14. Both feet or legs
15. One hand or arm and one foot or leg
16. One hand or arm and both feet or legs
17. Both hands or arms and one foot or leg
18. Both hands or arms and both feet or legs

**NONPARALYTIC ORTHOPEDIC IMPAIRMENTS**

(Because of chronic pain, stiffness, or weakness in bones or joints, there is some loss of ability to move or use a part or parts of the body)

19. One or both hands
20. One of both feet
21. One or both arms
22. One or both legs
23. Hip or pelvis
24. Back
25. Any combination of two or more parts of the body

**PARTIAL PARALYSIS**

(Because of a brain, nerve, or muscle problem, including palsy and cerebral palsy, there is some loss of ability to move or use a part of the body, including legs, arms, and/or trunk.)

26. One hand
27. One arm, any part
28. One leg, any part
29. Both hands
30. Both legs, any part
31. Both arms, any part
32. One side of body, including one arm and one leg
33. Three or more major parts of the body (arms and legs)

COMPLETE PARALYSIS

(Because of a brain, nerve, or muscle problem, including palsy and cerebral palsy, there is a complete loss of ability to move or use a part of the body, including legs, arms, and/or trunk.)

- 34. One hand
- 35. Both hands
- 36. One arm
- 37. Both arms
- 38. One leg
- 39. Both legs
- 40. Lower half of body, including legs
- 41. One side of body, including one arm and one leg
- 42. Three or more major parts of the body (arms and legs)

OTHER IMPAIRMENTS

- 43. Heart disease with no restriction or limitation of activity (History of heart problems with complete recovery)
- 44. Heart disease with restriction or limitation of activity
- 45. Convulsive disorder (e.g. epilepsy)
- 46. Blood diseases (e.g. sickle cell anemia, leukemia, hemophilia)
- 47. Diabetes
- 48. Pulmonary or respiratory disorders (e.g. tuberculosis, emphysema, asthma)
- 49. Kidney dysfunctioning (e.g. if dialysis [Use of an artificial kidney machine] is required)
- 50. Cancer-a history of cancer with complete recovery
- 51. Cancer-undergoing surgical and/or medical treatment

52. Mental retardation (A chronic and lifelong condition involving a limited ability to learn, to be educated, and to be trained for useful productive employment as certified by a State Vocational Rehabilitation agency under section 213.3102(t) of Schedule A)
53. Mental or emotional illness (A history of treatment for mental or emotional problems)
54. Severe distortion of limbs and/or spine (e.g. dwarfism, kyphosis [severe distortion of back])
55. Disfigurement of face, hands, or feet (e.g. distortion of features or skin, such as those caused by burns, gunshot injuries, and birth defects [gross facial birthmarks, club feet, etc.] )
56. Learning disability (A disorder in one or more of the processes involved in understanding, perceiving, or using language or concepts [spoken or written], e.g. dyslexia)

# Numbers and Percentages of Disabled Persons in Professional Staff

Fiscal year	1985		1986		1987		1988		1989	
	No.	Percent	No.	Percent	No.	Percent	No.	Percent	No.	Percent
All disabled employees	123	2.9	117	2.8	242	5.6	242	5.6	232	5.3
Nonseverely disabled employees	110	2.6	103	2.5	216	5.0	214	4.9	203	4.6
Severely disabled employees	13	0.3	14	0.3	26	0.6	28	0.7	29	0.7
All employees	4,227		4,153		4,329		4,331		4,400	



# Numbers and Percentages of Disabled Persons in and I and GS-7 to GS-12 Grades

Fiscal year	1985		1986		1987		1988		1989	
	No.	Percent	No.	Percent	No.	Percent	No.	Percent	No.	Percent
Disabled employees	54	2.9	52	3.0	87	4.7	90	5.0	88	4.7
Severely disabled employees	46	2.5	43	2.5	72	3.9	72	4.0	71	3.8
Partially disabled employees	8	0.4	9	0.5	15	0.8	18	1.0	17	0.9
Total employees	1,872		1,736		1,850		1,818		1,855	

# Numbers and Percentages of Disabled Persons in Band II and GS-13/14 Grades

Fiscal year	1985		1986		1987		1988		1989	
	No.	Percent	No.	Percent	No.	Percent	No.	Percent	No.	Percent
All disabled employees	55	3.0	52	2.8	111	5.9	107	5.6	103	5.4
Nonseverely disabled employees	51	2.8	48	2.6	103	5.5	99	5.2	93	4.9
Severely disabled employees	4	0.2	4	0.2	8	0.4	8	0.4	10	0.5
All employees	1,815		1,845		1,881		1,898		1,907	

# Numbers and Percentages of Disabled Persons in Band III, GS-15, and the SES

Fiscal year	1985		1986		1987		1988		1989	
	No.	Percent	No.	Percent	No.	Percent	No.	Percent	No.	Percent
Disabled employees	13	2.4	13	2.3	43	7.2	45	7.3	41	6.4
Nonseverely disabled employees	12	2.2	12	2.3	41	6.9	43	7.0	39	6.1
Severely disabled employees	1	0.2	1	0.2	2	0.3	2	0.3	2	0.3
Employees	540		572		598		615		638	

# Representation of Disabled Persons Among New Hires

Fiscal year	1985		1986		1987		1988		1989	
	No.	Percent	No.	Percent	No.	Percent	No.	Percent	No.	Percent
All disabled hires	10	1.97	14	5.51	21	3.38	5	1.42	19	4.16
Nonseverely disabled hires	9	1.77	10	3.94	19	3.06	4	1.14	17	3.72
Severely disabled hires	1	0.02	4	1.57	2	0.32	1	0.28	2	0.44
All new employees	508		254		621		352		457	

# Representation of Disabled Persons Appointed Under Special Authority

Fiscal year	1985	1986	1987	1988	1989
Number of employees <sup>a</sup>	3	3	0	3	2

<sup>a</sup>All employees appointed under a special authority for disabled persons are in the support staff.

Source: End-of-fiscal-year payroll data.

# New Hires Appointed Under Special Authority

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Fiscal year	1985	1986	1987	1988	1989
Number of employees <sup>a</sup>	4	0	2	2	1

<sup>a</sup>All employees appointed under a special authority for disabled persons are in the support staff.

Source: End-of-fiscal-year payroll data.

# PAB Survey of GAO Recruitment Sources for Disabled Applicants



April 5, 1990

PERSONNEL  
APPEALS  
BOARD

Dear Sir or Madam:

The Personnel Appeals Board of the U.S. General Accounting Office (GAO) is conducting a review of the effectiveness of GAO's employment of persons with disabilities. Your organization's name was furnished to the Board by GAO's Recruitment Office, as one of its recruiting sources for applicants with disabilities. To assist the Board in its review, I am asking your cooperation by requesting that you answer a few questions, below, concerning your contacts with GAO recruiters in connection with the recruitment of persons with disabilities. Please answer directly on this letter in spaces provided below. (If more space is required, please continue on the reverse side or attach a separate sheet of paper.)

1. How many contacts, either written, by visit or telephone (approximate please, if necessary, and so indicate) have GAO recruiters made with your organization during the last year, 1989, requesting applications from persons with disabilities?

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ACADEMY BUILDING U.S. GENERAL ACCOUNTING OFFICE WASHINGTON, D.C. 20548 PHONE (202)275-6127

Appendix XI  
PAB Survey of GAO Recruitment  
Sources for Disabled Applicants

2. Has this represented an increase or decrease from the previous year, 1988, or have the contacts remained the same?

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3. Have any of the disabled people your organization services been placed with GAO during the past 3 years? If so, how many (approximate please if necessary, and so indicate)?

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4. Please evaluate the effectiveness of GAO's recruiting efforts at your organization which are aimed at encouraging applications from disabled persons. Please also include a comparison of GAO with other Federal agencies, if possible.

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Appendix XI  
PAB Survey of GAO Recruitment  
Sources for Disabled Applicants

5. Finally, please let me know what, if any, changes GAO can make to recruit disabled persons more effectively at your organization.

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I would appreciate a response within 14 days. A self-addressed, stamped envelope is enclosed for your convenience. I can be reached on (202) 275-6137, and please do not hesitate to call me if you have any questions concerning this matter. Your cooperation will assist GAO's growth in its efforts to recruit a more diverse workforce. Thank you.

Sincerely,



A. Penny Dash

# PAB Survey of Regional Managers

## QUESTIONS FOR REGIONAL MANAGERS

1. Is your building easily accessible to a handicapped person?
  - if there are stairs into the building, is there a ramp?
  - is there an electronic door that opens automatically?
  - if there are stairs in the lobby, is there a lift or a ramp?
2. Are the elevators accessible?
  - can the buttons be reached by a person in a wheelchair?
  - can the buttons be distinguished by a person who is sight impaired?
  - when the doors open, is there something on the door frame that distinguishes each floor?
  - is there a sound device that signals what floor the elevator has stopped at?
3. Are the bathrooms accessible?

Imagine yourself in a wheelchair. Could you:

  - open the outside door from the hallway? (consider the weight of the door, the placement of the handle, which way the door swings etc.)
  - open any inside door?
  - enter one of the stalls?
  - use the commode?
    - are there rails?
    - is the toilet paper within easy reach?
    - are the toilet seat covers within easy reach?
  - wash up?
    - reach the knobs on the sink?

- reach the soap?
  - reach the towels?
  - reach the wastebasket?
  - use the mirrors?
  - use the shelves under or next to the mirrors?
4. Are there wheelchair accessible water fountains? If so, how many? (Please give the total number of fountains and the number of those that are accessible.)
  5. Are there wheelchair and other walking aid accessible phone booths? (Please give the total number of phone booths and the number of those that are accessible.)
  6. Are eating areas (cafeteria, canteen, snack bar) accessible?
    - are aisles wide enough to accommodate a wheelchair?
    - can a person in a wheelchair reach items on a shelf?
    - are food trays, silverware, drinks, etc. reachable?
    - are seats and seating arrangements accessible ?
  7. Do the offices and common areas appear to be laid out so as to make ingress and egress easily available?

8. Does your unit have a handicapped program coordinator?  
If so:
- what is that person's functions?
  - does he or she have direct access to the unit head in resolving issues involving the handicapped?
9. What efforts are made with regard to recruiting, hiring, training, promoting and accommodating handicapped persons?
- do sight impaired people have readers or other aids?
  - do hearing impaired people have special telephones and/or other equipment to help them perform their jobs?
  - what provisions have been made to ensure that handicapped people have accessible file cabinets; can use duplicating equipment; and are able to make use of library or similar facilities?
  - are voice activated computers used where an employee is unable to use a computer that requires typing?
  - what training is offered managers regarding responsibility toward the handicapped with regard to hiring, promotion, and terms and conditions of employment?
  - what efforts are made to mainstream handicapped employees?
10. Are your promotion and retention rates for handicapped employees similar to the rates for non handicapped employees? If there is a difference, how would you explain it?
11. Are handicapped employees clustered in particular job series or units or are they represented in positions across the board?

# ATBCB Report on Accessibility of GAO Headquarters



United States  
A · T · B · C · B  
The United States Architectural & Transportation  
Barriers Compliance Board

## MEMORANDUM

**TO:** Beth Don, Personnel Appeals Board

**FROM:** Ellen Harland, ATBCB *EH*

**DATE:** February 6, 1989

**RE:** Accessibility Survey, GAO Building at 441 G St. NW

The ATBCB is pleased to be able to participate in this type of voluntary fact-finding survey. By identifying the barriers which exist, removal of such barriers can be integrated with regular maintenance and with a phased program of renovation and remodeling. Such a comprehensive approach indicates greater fiscal responsibility and value than the unfortunately more common course of undertaking corrective action only in response to complaints. We are heartened and encouraged by the cooperation and foresightedness shown by the General Accounting Office.

Most of the elements or items noted as constituting barriers to persons with disabilities should not and can not be considered violations, for the regulations in effect at the time of construction or at the time of substantial alteration of the facility simply did not address accessibility. Alterations which were undertaken after August 7, 1984 and those to be effected from this date forward must be in compliance with all the provisions of the Uniform Federal Accessibility Standards (UFAS). To help in the orderly development of design leading to construction, appropriate UFAS section numbers are shown in parentheses following descriptions of items or elements identified as constituting barriers.

Incidental to the GAO survey, I was distressed to find the Personnel Appeals Board housed in a totally inaccessible building. All facilities designed, constructed, altered or leased for federal agencies must provide accessibility for persons with disabilities and the Personnel Appeals Board, with its important "accessible" image, should be located in an exemplarily accessible building.

1111 Eighteenth Street, N.W. • Suite 501 • Washington, D.C. 20036-3894 • 202 653-7834

-2-

Attached is a copy of the accessibility survey findings relative to the GAO building.

Attachment

**ACCESSIBILITY SURVEY REPORT**

General Accounting Office  
441 G Street, NW  
Washington, DC

Survey date: January 3 & 13, 1989  
Report date: January 30, 1989  
Surveyor: Ellen Harland, ATBCB

The Architectural & Transportation Barriers Compliance Board was created to ensure that Federal buildings and facilities covered by the Architectural Barriers Act are accessible and usable by people with disabilities. The Uniform Federal Accessibility Standards (UFAS) were developed by the four standard-setting Federal agencies, with the technical provisions based on the Minimum Guideline Requirements for Accessible Design (MGRAD). Federal buildings and facilities built, altered, or leased after August, 1984 must comply with the applicable provisions of UFAS.

Section 504 of the 1973 Rehabilitation Act prohibits discrimination in Federal programs and activities and guarantees access to persons with disabilities. In the conduct of this survey, many items which would deny accessibility under Section 504 were observed but are not included in the building survey below.

The items identified herein as "barriers" are not "violations," except in those few noted instances where alteration work undertaken was subject to compliance with the Uniform Federal Accessibility Standards (UFAS) because of the date of construction and is not in fact in conformance with the applicable technical provisions. To assist in the development of properly complying design of barrier removal as it is integrated into the GAO's regular schedule of maintenance/renovation, the applicable section of UFAS is cited with identification of the "barrier." The items noted below which are repeated throughout the building, hundreds of times in the case of narrow pairs of doors, are cited as recurring rather than separately and are marked with an asterisk.

- Platform lift at steps at G Street entrance is key operated with each employee having his or her own key. Visitors must be assisted by a guard; guard station on higher level has unobstructed view of all doors and all visitors must check in at guard station. Platform lifts "should facilitate unassisted entry..." per 4.11.3.

- \*Door pulls at main entrances (and elsewhere) are mounted at 51-1/2" AFF to centerline. Operating hardware shall be no higher than 48" AFF per 4.13.9.
- Handrails at steps at G Street entrance should have a grippable cross-section (4.26.2), have extensions at top and bottom according to 4.9.4(2) & Fig. 19, and occur at both sides of stairs 4.9.4 & 4.26.
- Information counter at G Street entrance is too high (at 42" AFF) to be usable by a person in a wheelchair. Height of a usable section should be between 28" and 34" AFF (4.32.4). Sales counters, reception desks, and built-in countertop work surfaces should have at least a portion usable or adaptable for use by a person in a wheelchair.
- \*Most lock/latch sets on doors have round knobs. Operating hardware shall not "...require tight grasping, tight pinching or twisting of the wrist to operate." 4.13.9
- \*Doors to women's restrooms do not provide 32" clear openings as required by 4.13.5. Clear openings are measured from the face of the door in a 90 degree (open) position to the face of the stop opposite; therefore, the required clear opening width cannot be gained using a 32 inch door.
- \*When doors in pairs are operated separately, one leaf (the active leaf) must provide the required 32 inch clear opening width. 4.13.4
- \*Each toilet room should (eventually) contain at least one standard stall except for those cases where "structural impracticability" can be proven where an "alternate stall" (36 inches OR 48 inches wide) may be used. 4.17.3 Grab bars, door clear opening widths, maneuvering spaces at doors and dispensers must be installed as shown in Figure 30 and as described in 4.17. In most instances where grab bars have been installed, they are not correctly sized or configured.
- \*Each accessible water closet shall be 17 to 19 inches to the top of the seat. In many cases, seat risers have been added to existing low toilets and, while this may serve as an interim solution, the extensions do not provide the stability of a regular seat. These low fixtures should be replaced with ones of proper height.
- \*Each toilet room should (eventually) contain at least one accessible lavatory and mirror meeting all the requirements of Section 4.19 and Figure 31. It is not necessary to specify a "special" lav; a 29" knee clearance below the apron, insulation



of hot water supply and drain piping, and lever or push controlled plumbing trim added to an existing lav quite often will suffice. A 30" high mirror mounted with its lower edge 40" above the floor will serve almost all users adequately. 4.19.6

- \*Accessible urinals must have an elongated rim at a maximum of 17 inches above the floor. 4.18

- \*Accessible drinking fountains may be wall mounted or free standing with clear spaces to allow a person in a wheelchair to make the appropriate approach (4.15.5). Most existing fountains do not meet the criteria for height (36") or type of control (no twisting required). 4.15.2 - 4.15.4

- The third floor restrooms that have been completely remodeled fairly recently (perhaps recently enough to be subject to compliance with the Uniform Federal Accessibility Standards) deserve special mention. Doors to the "accessible" stalls do not provide the required 32" clear opening; a grab bar is mounted to the side of the water closet sloping down (!) away from the WC from 32-1/2" AFF to 23-1/2" AFF (an innovative but nonconforming installation) and there is no grab bar immediately behind the toilet but one off to the side at 31-1/2" AFF instead of the required 33"-36"; the water closet is only 15" high and the centerline is only 17" from the side wall; and the lav counter does not provide the required 29" high knee clearance nor is the depth adequate below the counter. See 4.16 through 4.19.

- Another area worthy of specific mention is the door on 4th St., used by the public for access to Room 1000, the Document Distribution Office. This door is inaccessible in the following respects: neither leaf of this pair of 32 inch wide doors can provide a 32 inch clear opening (4.13.4); the thumb latch on the exterior does not meet the criteria for hardware (4.13.9); there is a 6 inch step up to the exterior landing (4.3.8); and the landing extends only 3 feet from the plane of the door and does not provide the required maneuvering space shown in Fig. 25.

- All spaces and elements of the new fitness center being planned for existing space on the lower level must be designed and constructed in conformance with applicable provisions of UFAS. The existing vehicular ramp from existing parking, at 6.3 degrees, far exceeds the allowable slope of 4.76 degrees for pedestrian ramps. As new access is designed, please note that all technical provisions (width, rise, landings, handrails, cross slope, etc.) regarding ramps apply to a walk with any slope between 1:20 and 1:12 (2.86 degrees and 4.86 degrees). Sec. 4.8.

- \*Out of the total of 894 parking spaces provided, 2% (or 18) must be designated for use by persons with disabilities. 4.1.1

- \*Accessible parking spaces must be striped, with a minimum width of 96 inches, and a 60 inch minimum access aisle alongside and have a vertical sign. The access aisles are part of the accessible route to the nearest entrances. 4.6
- \*Though running slopes of existing curb ramps generally are acceptable, side flares are extremely steep (19.5 degrees) and create a hazard for ambulatory persons who must walk across the curb ramp. 4.7
- \*When the fire alarm system is replaced, pull-stations should be located within reach ranges of a person using a wheelchair. 4.2.5 & 4.2.6
- In the cafeteria dining space, the cups are placed too high to be within acceptable reach ranges. At the beginning of the service line, "silverware" is also too high because it must be reached above the obstruction of tray supplies. 4.2.5, 4.2.6 and 5.3
- Steps at the back of the auditorium have no handrails. 4.9.4 requires handrails, as described, on both sides of stairs.
- A narrow and extremely steep ramp has been created to provide "handicapped access" to the platform level in the auditorium. As it now exists, this ramp is not only unusable but is actually hazardous. Ramps must conform to provisions of 4.8. A platform lift complying with 4.11 would be an acceptable solution.
- The remodeled Women's restroom on the 7th floor has not been constructed in conformance with applicable standards. In part, doors do not provide 32" required clear opening (4.13.5), large round knobs on lav do not meet requirements of 4.27.4, and grab bars in accessible stall are too short (4.17.6).
- The Health Clinic on the 1st floor is not at all accessible; the doors leading into the reception area do not provide clearance as required in 4.13.4 and no interior door to exam rooms, bedrooms, toilet rooms, or work areas provides a clear opening required by 4.13.5. No accessible toilet room is provided. By virtue of the service provided in this area, it would be reasonable to set a high priority on making this area accessible.
- The Canteen on the 1st floor is inaccessible because the doors leading to the space do not provide the required clear opening of 4.13.5.

# GAO Response to the ATBCB Report on Accessibility of GAO Headquarters



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

General Services  
and Controller

July 13, 1989

Beth L. Don  
Director, Office of EEO Oversight  
Personnel Appeals Board  
U.S. General Accounting Office  
Washington, D.C. 20548

Dear Ms. Don:

This is in response to your letter of March 30, 1989, in which you requested our comments on the findings made by Ms. Ellen Harland of the U.S. Architectural and Transportation Barriers Compliance Board, in her Accessibility Survey Report.

Ms. Harland's report was used as the basis for several meetings on building accessibility. As a result of these meetings we have established a Buildings Access Committee consisting of the following GAO staff: Mallory Andrews, Martin Duby, Jim Ferguson, Facilities Management (FM); Barbara Joseph, Office of General Counsel (OGC); Jay King, Office of Security and Safety (OSS); Jill Robinson, Office of Affirmative Action Plan (OAAP); and Tina Vandevier, Civil Rights Office (CRO).

The Committee has resolved that to the extent possible the GAO Building and other GAO facilities would be made accessible to and usable by people with disabilities. The Uniform Federal Accessibility Standards (UFAS) will serve as our guide for the design, construction, and alteration of all GAO owned or leased facilities. Further, that GAO will strive, subject to the constraints that arise because all of our leasing of facilities is through GSA, to only lease facilities that are in compliance with or that make the necessary changes to be in compliance with the UFAS standards.

The Committee met with Ms. Harland and discussed her survey report as well as the current renovation and modernization plans for the GAO Building. Again, the Committee agreed to use the UFAS standards in all modernization design work and in any interim alteration work. Further, we agreed to have Ms. Harland help us: 1) identify all barriers in the headquarters building; 2) begin planning for corrective


action; 3) develop our policy statement on facilities access; and 4) develop a plan to review other GAO facilities and to determine what corrective action is necessary.

In addition, the Committee requested that Ms. Harland, or someone from the Architectural and Transportation Barriers Compliance Board, provide selected GAO staff with training on the UFAS standards. On June 22, 1989, FM staff along with representatives from OAAP and OGC attended this training.

The next meeting has not yet been scheduled; however, it was agreed at the last session that with trained staff we could now begin to create a comprehensive list of areas for improvement. Once the list is established the Committee will set priorities and decide which ones are critical, and therefore, need immediate attention, as well as which ones can wait to be included in the modernization program. Also, we will be able to establish budgets and implementation plans for these corrections and/or enhancements.

Finally, it should be noted that FM has recently hired a new manager for building operations. This individual has had extensive formal training in the recognition of architectural barriers that prevent building accessibility by disabled persons. In addition, FM has a manager for design services who is a professional member of the American Society of Interior Design (ASID) and has also had formal training in this area.

Sincerely,

  
Susan B. Burtner  
Deputy Director, GS&C

# Comments of the Advisory Council for Persons With Disabilities



United States  
General Accounting Office

## Memorandum

**Date:** August 22, 1990  
**To:** Director, EEO Oversight, GAO Personnel Appeals Board  
- A. Penny Dash  
**From:** President, Advisory Council for Employees with  
Disabilities - Donald J. Heller *DJH*  
**Subject:** Comments on Draft Report

Listed below are the Council's comments regarding the July 20, 1990 draft report entitled, PAB's Oversight Report on GAO's Employment of Persons with Disabilities.

Overall, the Council agrees with the results-in-brief which state that GAO's disabled employees program from 1985 through 1989 had languished and that GAO's efforts during this period fell far short of what is traditionally expected of the Government as a "model" employer. We believe that this important message should be placed in the beginning of the report as a separate chapter or section.

The Council also believe that the results-in-brief section should cite the related bad effects that are included throughout the report. For example the results-in-brief section should include the following program results:

- low representation of severely handicapped employees in evaluators and evaluator-related positions, in PFP bonus awards, and in new hires;
- absence of an affirmative action plan for the five year period with the accompanied lack of internal monitoring and accountability;
- unfavorable employee and management attitudes;
- lack of training to sensitize supervisors and management; and
- existence of architectural barriers.



Operations Improvement

Appendix XV  
Comments of the Advisory Council for  
Persons With Disabilities

The Council noted that the draft report did not have any statistics regarding disabled employees time-in-grade and promotion history as compared to non-disabled employees. This information could provide some information regarding the disabled employees attitude that promotion opportunities for them are limited.

Since the December 31, 1989, PAB review cutoff date, the Office of Affirmative Action Plans (OAAP) and the Advisory Council for Persons with Disabilities (ACPD) have made some progress as follows:

OAAP

- Hired a full-time coordinator for employees with disabilities program in March 1990.
- Developed an Affirmative Action Plan for Employees with Disabilities for 1990-1991 and presented its first draft for comment in June 1990.
- Conducted a two-day Affirmative Action for Persons with Disabilities Working Conference in June 1990.

ACPD

- Held election of officers in February 1990
- Completed a history project in May 1990 to determine what actions took place since 1985 regarding GAO's Program for Disabled Employees.
- Worked with the Office of Information Resources Management to get Telephone Devices For The Deaf (TDDs) for all known hearing/speech impaired employees and for key GAO offices that deal with these employees. This action was completed in July 1990.
- Furnished comments on OAAP's draft plan in August 1990.
- Revised the Council's charter and submitted it to the Assistant Comptroller General for Operations in August 1990.

The Council appreciates the opportunity to comment on your draft report. If you have any questions, please call me on (513) 684-7120.

cc: All ACPD Members  
Ms Margaret Barlow (OAAP)

# Comments of the PAB General Counsel



## PERSONNEL APPEALS BOARD

Office of the General Counsel  
United States General Accounting Office  
Washington, D.C. 20548  
(202) 275-1663

Carl D. Moore, General Counsel  
Jan Freeman Willis, Deputy General Counsel

August 27, 1990

A. Penny Dash  
Director  
EEO Oversight  
Personnel Appeals Board  
Academy Building -- Second Floor  
U. S. General Accounting Office  
Washington, D. C. 20548

RE: PAB EEO Oversight Draft Report

Dear Ms. Dash:

This is in response to the subject report that you sent to GAO, to GAO Employee Group Councils, and to this office on July 20, 1990.

Pursuant to the Board's policy regarding EEO Oversight, it is the function of this office to assist the GAO Employee Groups in the EEO Oversight Process. In this case, we reviewed the draft Report and discussed issues raised in the draft Report with the interested Employee Group representatives. For the most part, the Councils concluded that the organization most suited to responding on behalf of GAO employees was the Advisory Council for Employees with Disabilities (ACED). They also found the comments of the ACED to be appropriate. There was no need for this office to provide any further technical assistance to the Councils.

While we see no need to add to or repeat the worthwhile comments of the ACED, we should take the opportunity to compliment you on a very good product. The draft Report admirably describes the recent history of the GAO program for the employment of persons with disabilities and focuses attention on various matters that deserve attention in the immediate future.

Sincerely,

A handwritten signature in black ink that reads "Carl D. Moore".

Carl D. Moore

cc: Heads of Employee Group Councils

# Comments of the General Accounting Office

Note: PAB comments on this letter appear at the end of this appendix.



Assistant Comptroller General  
of the United States

Washington, D.C. 20548

October 5, 1990

Ms. A. Penny Dash  
Director, EEO Oversight  
Personnel Appeals Board

Dear Ms. Dash:

We appreciate the opportunity to comment on the Personnel Appeals Board's (PAB) draft report on GAO's Employment of Persons with Disabilities. While a number of the draft's specific recommendations have merit, others are based on incomplete and inaccurate information. As discussed with you recently, we recognize that our programs and services for our disabled employees can be improved, but strongly disagree with the draft's overall characterization of our progress and efforts in this area.

The first section of this letter identifies some of our most serious concerns; the second section comments on your recommendations.

#### CONCERNS WITH THE DRAFT REPORT

Important sections of the report--for example, those dealing with employment statistics, building access, and reasonable accommodations--are based on incomplete and inaccurate information. We simply do not believe that the results support the conclusion that our program has languished since 1985. The following are examples which illustrate some of our major problems.

-- The draft report does not fairly describe GAO's progress in increasing employment of persons with disabilities. For example, the draft report states that "There has been a steady increase in the percent representation of people with any reported disability in the Federal Government since 1985"... and goes on to say "GAO narrowed the gap between it and the ...executive branch...but remained behind as of fiscal year 1988". Yet the very data included in the report do not support these statements. The chart on draft page 59 shows that GAO dramatically increased its percentage of employees with disabilities from 3 percent of our staff in 1985 to about 5.5 percent in 1988. It also shows that the federal government did not have much of an increase over the same period (holding relatively steady between 5.5 percent and 6 percent). The draft text is not a fair or reasonable interpretation of the data.

Now on p. 46.



- The report presents information without putting it into appropriate contexts. For example, the draft comments on the relatively small numbers of disabled persons hired each year, but does not relate this to overall hiring activity. This past year, we hired persons who identified themselves as disabled at a considerably higher rate than we hired those without disabilities. Specifically, for the total applicant pool, 1 out of every 30 applicants obtained a GAO position, while 1 in 18 disabled applicants was hired. Similarly, in several places, the PAB draft report uses the EEOC's data which indicates that severely disabled persons of workforce age and able to work are 5.95 percent of the entire workforce population. We do not think the "population able to work" is the appropriate benchmark, given the educational and/or experience requirements for GAO's major positions. Instead we believe a more appropriate measure would be persons with college educations who are disabled. The latest census data of this group suggests that 1.3 percent of college educated persons are disabled.
- The draft is very critical because the "Building Access Committee" has not met since 1989. Contrary to what the report says, this was an ad hoc advisory group, set up informally by the Office of Affirmative Action Plans; it was never intended, nor did it ever have the authority, to establish accessibility policy. It did provide useful information and advice regarding desirable improvements, which are being considered in our extensive modification program. From a management perspective, however, we have looked, and will continue to look, to the managers responsible for GAO's modernization efforts to ensure compliance with all standards (the design review team, which is a key mechanism for doing so, is not even mentioned in the PAB draft report). It appears that our confidence is well placed. The draft provides little evidence to suggest that GAO is not living up to its obligations to ensure access for disabled employees. In fact, the Architectural and Transportation Barriers Compliance Board, which reviewed the accessibility of the GAO building at the request of the PAB, wrote at the conclusion of its review that it was "heartened and encouraged by the cooperation and foresightedness shown by GAO". In its review, the Board identified very few violations and agreed that these items and other suggested changes could be addressed as GAO continues to implement its modernization program.
- The draft report is silent on some important initiatives dealing with the issues affecting reasonable accommodation and managing disabled employees. For example, several years ago GAO produced a policy for

dealing with AIDS in the workplace. GAO has been widely credited for being in the forefront on the issue of accommodating employees with AIDS. A second example is our current efforts to enhance the agency's ability to manage an increasingly diverse workforce. Issues pertaining to the employment of the disabled are an integral part of this endeavor. Two staff members representing persons with disabilities are on the advisory group which is providing guidance on training approaches in this important area.

- The draft presents employee survey results without any assessment of the validity of selected statements. For example, the draft says that 12 employees reported that they had requested but were denied reasonable accommodation. We asked you for information on these cases, but were not able to obtain it. As is, the report provides no information which would help a reader decide whether this was a real problem at GAO; we cannot tell whether the requests were work-related (we sometimes get requests which are not related to GAO employment); or whether they were "reasonable" within the generally accepted definition of the term. We know of no current situation where reasonable accommodation is not being provided when warranted. And the Civil Rights Office-- which is the office where employees should go if they believed they were denied reasonable accommodation--has no knowledge of any outstanding legitimate requests.

The above illustrate some of the issues we raised during our meeting last week. I and my staff are available to discuss these and other discrepancies and misunderstandings in more detail should you wish to pursue the matter.

#### RECOMMENDATIONS

Regarding the draft's recommendations, we think many of them make sense and are in line with what we are doing or plan to do. The report correctly points out that we are still working on our affirmative action plan. There are a number of policy issues yet to be resolved; we will complete this effort as soon as possible. As part of this effort, we are considering some organizational issues including possible realignments of responsibilities among the offices. In making our decisions, we will consider the suggestions in the report.

We agree with the thrust of the report's recommendations relating to enhancing staff awareness of programs and services focused on persons with disabilities. To this end, the Advisory Council on Persons with Disabilities has recently begun assuming a more active role. And we recently

sponsored a conference attended by managers and staff involved in GAO's disabled programs. We plan to rely upon the many GAO staff offices that continue to be involved in managing programs affecting the disabled to increase manager, employee, and applicant awareness.

Regarding training, we are considering how best to ensure that all staff--particularly supervisors--are aware of their responsibilities in managing persons with disabilities. These issues are touched upon in some existing and planned efforts (tangentially in the mandatory EEO course, and more directly in our diversity initiative and our new supervisory training). At this time, we do not have any GAO training course devoted solely to supervising disabled persons. We will be looking at what is available outside GAO to supplement training, especially for persons involved in the programs for the disabled.

We agree with your recommendation regarding improved orientation materials for disabled staff members and steps which can be taken to increase awareness for those who may become disabled after they join GAO.

In other areas we have taken steps to improve our data bases. Within the past 2 years, at your suggestion, we have begun tracking applications data. From its inception, we have tracked pay for performance data for disabled persons and will continue to do so. (For your information, the percent of disabled persons receiving bonuses rose from 35 percent in 1989 to 42 percent in 1990. Among the severely disabled the numbers were 45 percent in 1989 and 42 percent in 1990.)

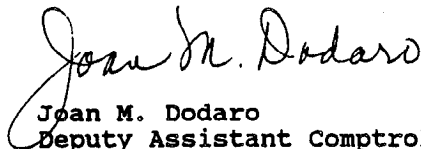
GAO has set an ambitious agenda to revise all of its personnel orders over a 3 year period. We are in year two of this effort. The Selective Placement Order is scheduled for revision and will incorporate changes resulting from decisions we make on organizational responsibility and structure.

We have some serious reservations about the recommendation regarding improving the accuracy of GAO's data base. We know our data base significantly understates the number of persons with disabilities employed at GAO. In fact, in several divisions we believe up to half of the eligible employees have chosen not to identify themselves as disabled. We routinely provide reasonable accommodations to staff who are not disabled according to our data base. As you know, GAO, like the rest of the government, relies on employee self-identification for its data on its disabled workforce.

What seems to be at odds here is an employee's right to privacy versus the accuracy of our data base. We are concerned that an effort to try to "convince" persons to change their disability status would be viewed as intrusive and insensitive.

We will provide you information on our decisions regarding organization, responsibilities, and affirmative action as soon as they are finalized. Again, we appreciate the opportunity to comment on the draft report. In the future, it might be helpful to schedule an exit conference at the end of oversight studies. Some of the problems and misunderstandings may have been avoided had you briefed the Assistant Comptroller General for Operations or me on your findings.

Sincerely yours,



Joan M. Dodaro  
Deputy Assistant Comptroller General  
for Human Resources

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The following are PAB comments on GAO's letter dated October 5, 1990.

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**PAB Office of EEO Oversight Comment**

The Board considered GAO's written comments of October 5, 1990, and made appropriate modifications to the report. Some of the data and information that GAO first supplied with its comments addressed activities that occurred after the time period covered by the report. Should the Board conduct a follow-up report, that data and information will be considered.

