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**FEDERAL AFFIRMATIVE  
EMPLOYMENT**

**Status of Women and  
Minority Representation in  
the Federal Workforce**

Statement of  
Bernard L. Ungar, Director,  
Federal Human Resource Management Issues,  
General Government Division



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## FEDERAL AFFIRMATIVE EMPLOYMENT

Summary of Statement by  
Bernard L. Ungar  
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A basic federal personnel policy, set out in law, is to create a competent, honest, and productive federal workforce that is reflective of the nation's diverse population.

While improvements have occurred, the federal civilian workforce did not reflect the nation's diverse population as of September 1990. Representation of white women, Hispanic men, and Hispanic women in the federal workforce lagged behind their representation in the nation's civilian labor force.

White women and minorities have increased their presence in the government's middle (grades 13 to 15) and upper management levels. Nevertheless, even with these increases, a substantial disparity exists. As grade levels go up, their presence goes down.

A fundamental means of enabling white women and minorities to be appropriately represented in management is to ensure that they are appropriately present in agencies' key jobs--jobs that can lead to middle and upper management positions. GAO analyzed 261 key jobs in 25 agencies and found that women and minorities were still often underrepresented in key jobs in comparison to their representation in the nation's labor force in similar occupations. GAO also analyzed the promotion and hiring of women and minorities into the 261 key jobs, and found that they were generally entering grades 13 through 15 at rates better than their proportion of the key job workforce at those grades. However, as of September 30, 1990, the workforce in grades 13 to 15 was still dominated by white men.

A first step in affirmative employment efforts is to determine whether women and minorities are underrepresented. Agencies do so by comparing their workforce against the nation's civilian labor force. However, agencies are generally applying a benchmark of the civilian labor force that at times is outdated and does not adequately reflect specific occupational and/or educational requirements. GAO recommends that the Equal Employment Opportunity Commission (EEOC), in cooperation with the Office of Personnel Management (OPM), develop an inventory of benchmarks that agencies may apply in appropriate circumstances.

The identification and removal of barriers to the entry and progression of women and minorities in the federal workforce are also part of affirmative employment efforts. Identifying and addressing barriers may be done by examining such personnel events as recruitment, hiring, training and development, promotion, and separation. GAO made recommendations to EEOC and OPM on further analyses of personnel event data.



Mr. Chairman and Members of the Committee:

We are pleased to be here today to share with you the results of this phase<sup>1</sup> of our ongoing review of the federal affirmative employment program, a review that this Committee requested. My testimony will focus on the representation status of women and minorities in the federal workforce, particularly at the upper grade levels and in jobs that typically lead to those grades. It will also focus on the need (1) to improve the statistical criteria used to measure women and minority representation and (2) for more emphasis on collecting and/or analyzing recruiting, hiring, training and development, promotion, and separation data to better identify barriers to women and minorities.

### BACKGROUND

The Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972, requires federal agencies to develop and implement affirmative employment programs to eliminate the historic underrepresentation of women and minorities in the workforce. The EEOC is responsible for providing agencies with guidance on their affirmative employment programs and approving agency plans for those programs.

The Civil Service Reform Act of 1978 clearly provided for the first time in law that federal personnel management should be implemented to provide a competent, honest, and productive federal workforce that is reflective of the nation's diverse population. In addition, the 1978 act created the Federal Equal Opportunity Recruitment Program and requires agencies to conduct affirmative recruitment for those occupations and grades in which women and minorities are underrepresented. The act assigned the Office of Personnel Management (OPM) responsibility for assisting agencies in their affirmative recruitment efforts and for overseeing the Federal Equal Opportunity Recruitment Program.

EEOC and OPM require agencies to prepare affirmative employment and/or recruitment plans. As part of plan development, each agency is required to analyze its workforce, comparing the representation of women and minority groups in its workforce with the representation of the same groups in the appropriate civilian labor force.

The EEOC requires agencies to also analyze the women and minority composition of their key jobs, which the EEOC describes as jobs with 100 or more employees that have advancement potential to senior level positions. The EEOC also requires analysis by pay

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<sup>1</sup>In May 1991, we issued a report and presented testimony to this Committee on the need for better Equal Employment Opportunity Commission (EEOC) guidance and agency analysis of women and minority underrepresentation. The report is numbered GAO/GGD-91-86; the testimony, GAO/T-GGD-91-32.

grade, allowing agencies to group grades (e.g., grade 9 through grade 12) to gauge the extent of women and minority representation. In response to our May 1991 recommendation, the EEOC said it would explore the possibility of requiring agencies to analyze grade groupings within key jobs.

#### COMPARISONS OF FEDERAL AND CIVILIAN LABOR FORCES

To determine the status of women and minority representation in the federal workforce, we made two different sets of comparisons. One set determines if the levels of women and minority employment in the federal labor force<sup>2</sup> changed between two points in time, 1982 and 1990. 1982 was the first year covered under EEOC's directive to agencies for multiyear affirmative employment plans. The labor force data included both blue- and white-collar employees.

As shown in figures 1 and 2, the employment levels of women and minorities in the federal workforce, except for black men and American Indian men, were greater in 1990 than in 1982. The differences ranged from less than 1 percent to 1.6 percent. The employment level for black men decreased 0.5 percent and the employment level for American Indian men was essentially unchanged.

Another way of expressing the change is by computing a rate of increase or decrease; in other words, computing a rate of change. This is done by dividing the amount of increase/decrease by the 1982 percentage. The rates of increase ranged from about 3 percent for white women to 56 percent for Asian women. The rate of decrease for black men was 7 percent.

Our second set of comparisons compares the 1990 federal labor force with the 1990 civilian labor force to determine if the federal workforce, after accounting for the increases since 1982, is representative of the civilian labor force.<sup>3</sup> The federal and civilian labor force data included both blue- and white-collar occupations. As figures 1 and 2 show, white women and Hispanic

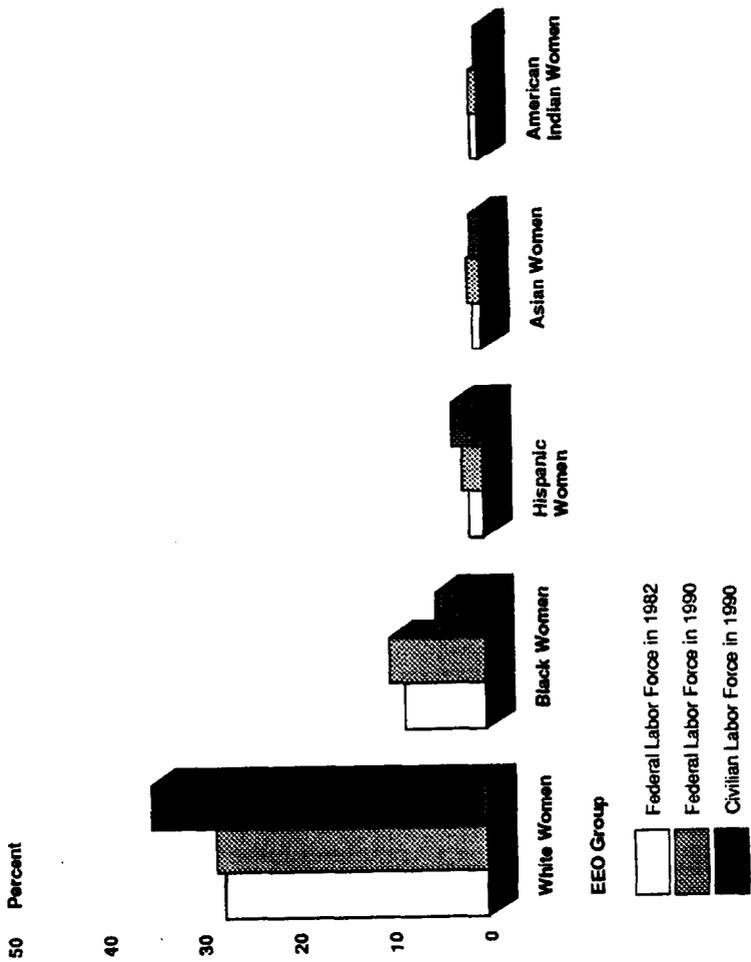
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<sup>2</sup>To make our comparisons, we used data from OPM's Central Personnel Data File (CPDF). This file includes data on executive branch employees. Certain agencies do not report data to the CPDF and they include the U.S. Postal Service, Tennessee Valley Authority, National Security Agency, Central Intelligence Agency, Federal Reserve Board, and the Defense Intelligence Agency.

<sup>3</sup>We obtained civilian labor force data from OPM. According to OPM, these data were derived from annual averages published in the Bureau of Labor Statistics Publication Current Population Survey. The data we used were as of September 1990.

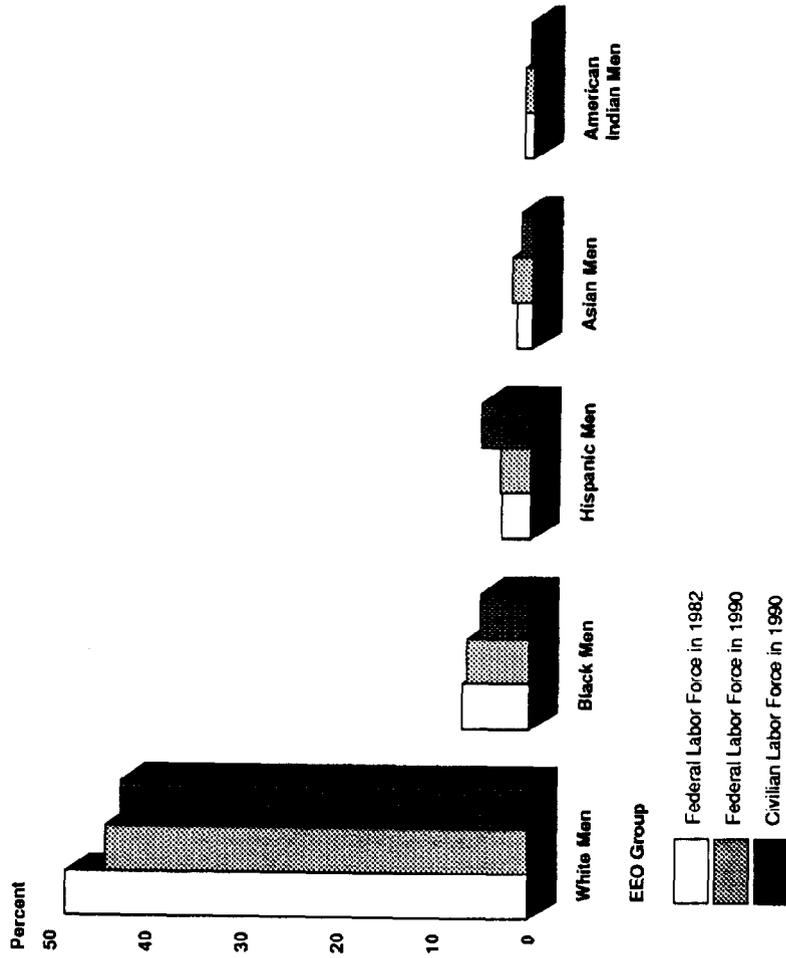
men and women are underrepresented in the federal workforce. Using an index where less than 100 indicates underrepresentation, white women have an index of 81; Hispanic women, 67; and Hispanic men, 62.

Figure 1: Employment of Women in Executive Agencies



Source: OPM's Central Personnel Data File and Bureau of Labor Statistics Current Population Survey Data.

**Figure 2: Employment of Men in Executive Agencies**



Source: OPM's Central Personnel Data File and Bureau of Labor Statistics Current Population Survey Data.

DISTRIBUTION OF WOMEN AND  
MINORITIES BY GRADE

The presence of women and minorities in the federal workforce may also be gauged by where they stand in the government's hierarchy. Even if they were fully represented in the federal labor force, their representation would be incomplete if they mostly occupied the lower ranks of the government's hierarchy or, conversely, the higher ranks.

Most federal employees are in white-collar occupations and under a white collar pay schedule that includes pay grades 1 to 15.<sup>4</sup> Grades 13 to 15 employees are often considered the government's middle managers. The government's top career managers are in the Senior Executive Service (SES).

As figures 3 and 4 show, the percentage of white women, minority women, and minority men generally increased in grades 11 through 15 and the SES between 1982 and 1990. The 1990 percentages increased by 0.1 percent to nearly 9 percent.

The increases varied by white women, minority women, and minority men. The increases for white women were larger than those for minority women, and the increases for minority women were usually larger than those for minority men. The increases for white women ranged from 1.7 percent to 8.9 percent. The increases for minority women ranged from 0.1 percent to 4.3 percent. And, the increases for minority men ranged from 0.4 percent to 1.5 percent.

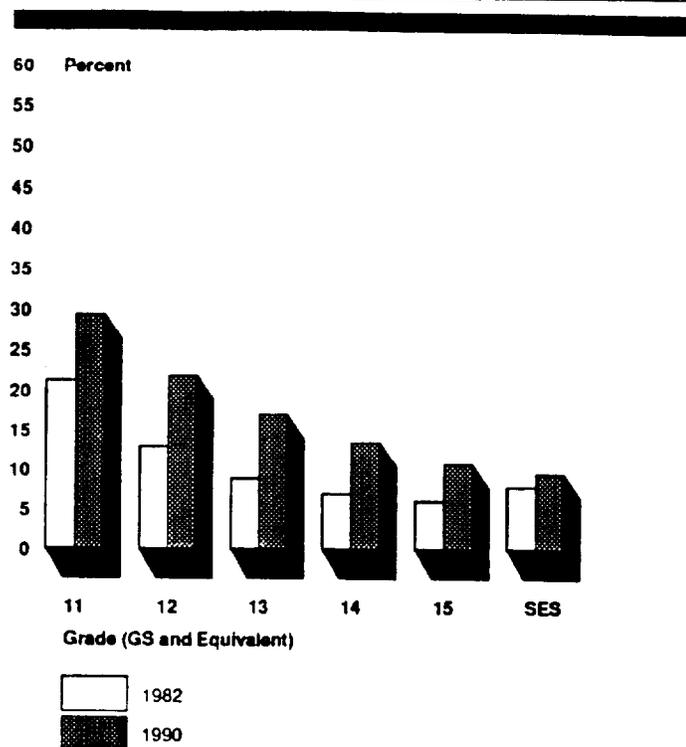
Another way of expressing the change is by computing the rate of change. The rates of increase for minority women were generally larger than those for white women, and the rates of increase for white women were larger than those for minority men. The rates of increase for minority women ranged from about 7 percent to 104 percent; rates of increase above 90 percent occurred in grades 12, 13, 14, and 15. The rates of increase for white women ranged from about 22 percent to 94 percent; rates of increase above 90 percent occurred in grades 13 and 14. The rates of increase for minority men were usually substantially lower than those of women. The rates of increase for minority men ranged from about 7 percent to almost 18 percent.

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<sup>4</sup>We are referring to jobs under the General Schedule pay plan, the Equivalent to General Schedule pay plan, and the Senior Executive Service pay plan. The General Schedule pay plan is the basic compensation schedule for most federal civilian white-collar employees. The Equivalent to General Schedule pay plan includes, for example, the pay plan for Foreign Service employees at the State Department and pay plans for physicians and nurses at the Department of Veterans Affairs.

Figure 3: Distribution of White Women and Minority Women in Executive Agencies by Upper Grade Level

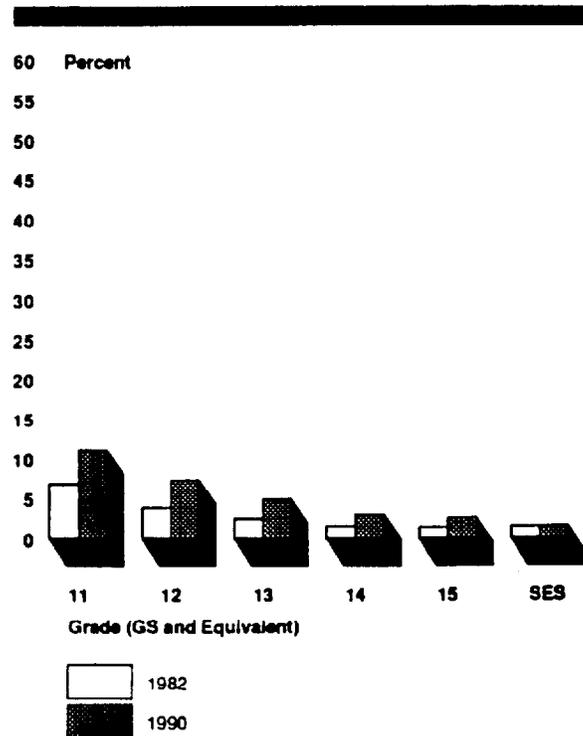
Distribution of White Women in Executive Agencies by Upper Grade Level (1982 & 1990)



Data as of September 30 for the year indicated

Source: OPM's Central Personnel Data File.

Distribution of Minority Women in Executive Agencies by Upper Grade Level (1982 & 1990)

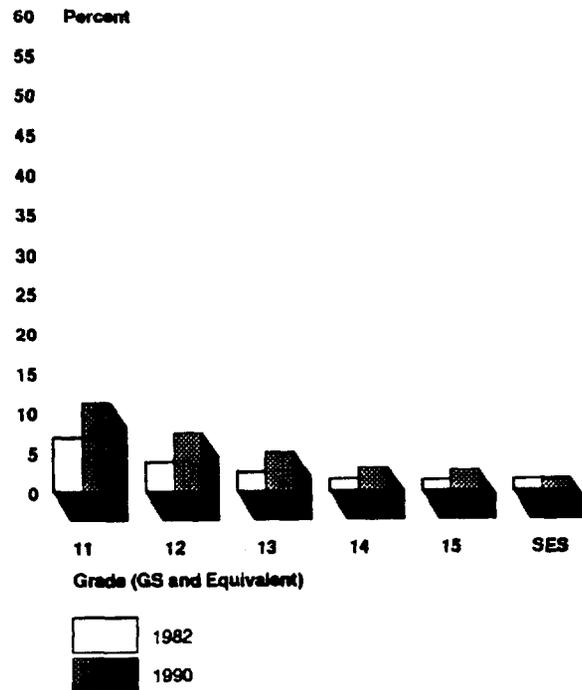


Data as of September 30 for the year indicated

Source: OPM's Central Personnel Data File.

Figure 4: Distribution of Minority Women and Minority Men in Executive Agencies by Upper Grade Level

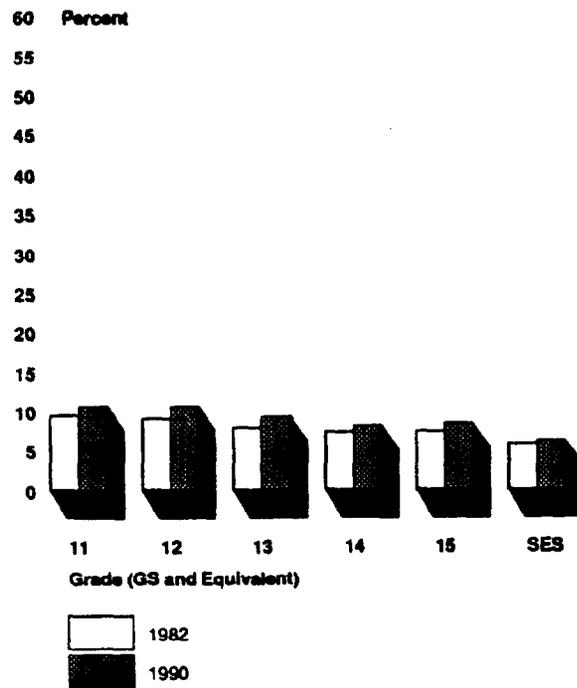
Distribution of Minority Women in Executive Agencies by Upper Grade Level (1982 & 1990)



Data as of September 30 for the year indicated

Source: OPM's Central Personnel Data File.

Distribution of Minority Men in Executive Agencies by Upper Grade Level (1982 & 1990)



Data as of September 30 for the year indicated

Source: OPM's Central Personnel Data File.

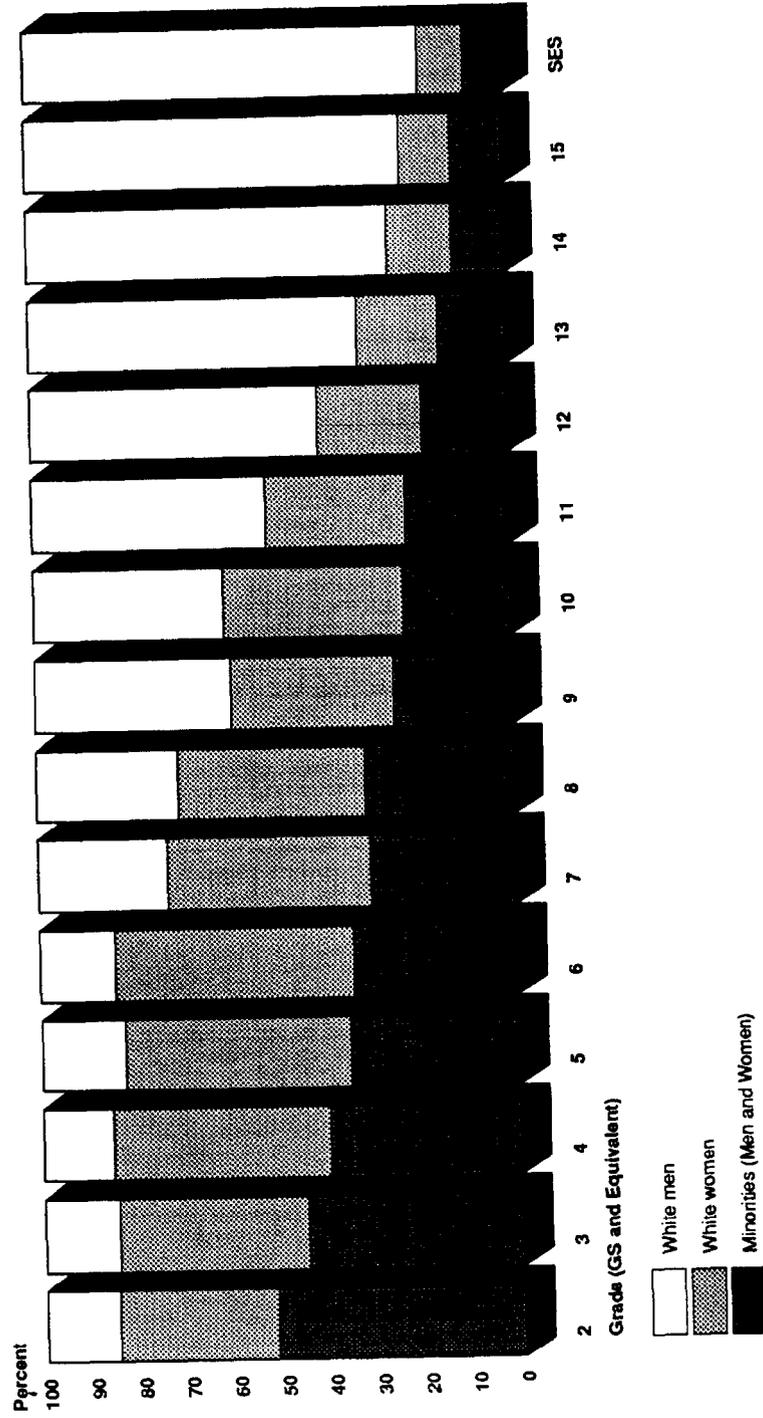
Only limited data are available to compare grade distribution of white women and minorities in the federal and civilian workforces. However, as of September 30, 1990, women and minorities comprised 17.2 percent of the federal SES workforce. In comparison, women and minorities comprised 9.2 percent of the executive level (defined as assistant vice-president and higher or the equivalent) of 94 Fortune 1000 companies surveyed by the Department of Labor in its 1991 report on the "glass ceiling."

These data indicate that women and minorities may have higher representation in the top levels of the federal workforce than at comparable levels in the companies surveyed by the Labor Department. Even so, as figure 5 indicates, much room remains for improving the presence of white women and minorities in the middle and upper levels of federal management.

Figure 5 shows the status of white women and minorities by grade as of September 30, 1990, including all of the increases that have occurred since 1982. It shows that white women and minorities comprised the majority of the federal workforce at grades 2 through 11. However, their presence decreased to about 30 percent for grade 13 positions and continued downward to about 17 percent for the SES.

We recognize that a number of factors, such as job requirements, educational levels of employees, employees' time in grade, and the number of job vacancies, all influence the progression employees make in the government's hierarchy. However, we are suggesting with figure 5 that (1) the base of the government's hierarchy is very different from its middle and upper levels and (2) the representation of white women and minorities in those middle and upper levels are low enough on their face to warrant continued attention.

Figure 5: Distribution of Workforce in Executive Agencies by Grade as of September 30, 1990



Source: OPM's Central Personnel Data File.

DISTRIBUTION OF WOMEN AND  
MINORITIES IN KEY JOBS

In our opinion, a fundamental means of enabling white women and minorities to be appropriately represented in middle and upper management is to ensure that they are appropriately present in agencies' key jobs. Key jobs usually have a career ladder to middle management grades and often lead to SES positions. Some common key jobs among agencies are attorney, computer specialist, accountant, and engineer.

We are not alone in our opinion. At a September 1991 national conference on dispute resolution sponsored by the EEOC, officials from EEOC, OPM, the Merit Systems Protection Board, and the Federal Labor Relations Authority said in public forums that shattering the glass ceiling in the federal government will depend on (1) getting women and minorities into the job tracks that lead to top management and (2) providing them with the necessary training and development opportunities to progress within those job tracks.

During the phase of our work that we testified on in May, we found that agencies (1) often did not perform workforce analyses by key job as required by EEOC, (2) were often confused about the definition of key job, and (3) did not always identify their key jobs. We recommended that EEOC address these matters, and EEOC is taking actions to clarify its requirements and to ensure agencies' adherence to them.

For this phase of our review, we determined the extent to which white women and minorities were represented in 25 agencies' key jobs. The agencies had identified the jobs in their affirmative employment plans. After applying a clarified definition of key job that eliminated clerical jobs and jobs with less than 100 employees, we reviewed a total of 261 key jobs. The EEOC agreed with the clarified definition. We used CPDF data as of September 30, 1990, to determine the number of employees in each job and their gender, race, and ethnic origin. The names of the 25 agencies and a description of the process we followed to select them are provided in appendix I.

At the 25 agencies, white women and minorities were more likely to be employed in jobs that were not key jobs. While they made up about 57 percent of the total workforce of the 25 agencies, they accounted for about 44 percent of the key job employees.

In addition, white women and minorities were very often underrepresented in the 261 key jobs in relation to their representation in the civilian labor force for those same occupations. As table 1 shows, underrepresentation existed in

nearly every key job.<sup>5</sup> The groups most often underrepresented were white women, Asian men, Hispanic women, and Hispanic men.

Table 1:

Number of Key Jobs in Which White Women and Minorities were Underrepresented

<u>Total key jobs</u>	<u>Number with full representation</u>	<u>Number with under representation</u>	<u>Number of jobs in which group underrepresented</u>								
			<u>White Women</u>	<u>Black</u>		<u>Hispanic</u>		<u>Asian</u>		<u>American Indian Men</u>	<u>Indian Women</u>
				<u>Men</u>	<u>Women</u>	<u>Men</u>	<u>Women</u>	<u>Men</u>	<u>Women</u>		
261	8	253	151	68	61	118	125	135	102	101	89
	percent	97	60	27	24	47	49	53	40	40	39

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<sup>5</sup>To measure representation, we used occupation specific data from the 1980 census as our benchmarks. More current benchmarking data were not readily available. We could not use 1990 civilian labor force data derived from the Bureau of Labor Statistics' Current Population Survey because that survey does not cover enough households to provide statistically sound projections of the number of Asians and American Indians by occupation.

The level of representation for each key job rests in large measure on an agency's efforts to employ women and minorities. As table 2 shows, some agencies have been more successful than others. As we testified in May 1991, opportunities exist for comparing the progress made by agencies and using the good practices employed by one agency to help another agency that is not doing as well. Table 2 shows examples of women and minority representation at various agencies in two common key jobs.

Table 2:

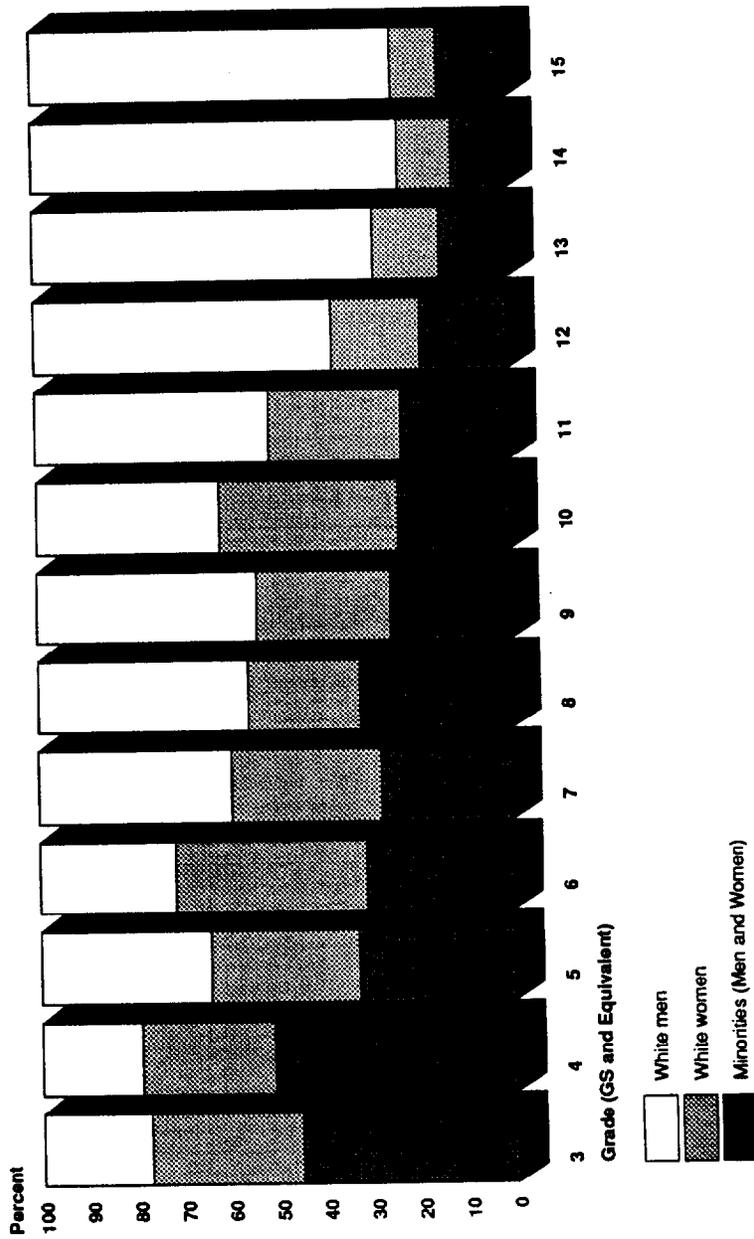
Examples of Different Representation Levels Achieved  
by Selected Agencies for Key Jobs

<u>Job Series</u>	<u>Agency</u>	<u>Representation Index</u>								
		<u>White Women</u>	<u>Black Men</u>	<u>Black Women</u>	<u>Hispanic Men</u>	<u>Hispanic Women</u>	<u>Asian Men</u>	<u>Asian Women</u>	<u>American Indian Men</u>	<u>Indian Women</u>
Computer Specialist	HHS	152	193	488	44	83	37	133	550	400
	OPM	149	407	718	28	0	41	178	0	500
	Treasury	140	237	624	78	200	93	222	100	100
Accountant	GSA	93	291	263	22	154	21	53	400	0
	HUD	38	700	703	156	92	147	353	600	150
	Treasury	59	622	933	50	39	79	120	0	0

Note: Less than 100 indicates underrepresentation. Less than 50 indicates severe underrepresentation.

Where do white women and minorities that are employed in the 261 key jobs stand within the grade structure of those jobs? As of September 30, 1990, white women and minorities accounted for about 51 percent to 79 percent of all key job employees in grades 3 through 11. As figure 6 shows, their representation dropped considerably thereafter, accounting for about 23 percent to 37 percent of all key job employees in grades 12 through 15.

Figure 6: Distribution of Workforce in Key Jobs for 25 Executive Agencies by Grade as of September 30, 1990



Source: OPM's Central Personnel Data File.

As suggested by tables 1 and 2 and figure 6, more remains to be done to ensure that women and minorities are fully represented in the government's key jobs and to ensure that, once employed, barriers to their progress are eliminated. While agencies themselves must act on these matters, guidance and oversight from EEOC and OPM are also essential.

#### IMPROVEMENTS NEEDED IN CRITERIA FOR MEASURING REPRESENTATION

A fundamental element in determining representation status requires comparisons with the civilian labor force. However, there are different approaches to determining the appropriate civilian labor force to compare with, and each approach has its advantages and disadvantages.

The approach most widely used in the federal government relies on decennial census data, and the EEOC has required agencies to use that data even when it became outdated. We believe the EEOC should work with other agencies, such as the Department of Labor's Bureau of Labor Statistics and the Department of Education, to develop an acceptable inventory of approaches that agencies may draw from and apply in specific situations.

#### Different Approaches Can Produce Different Representation Indices for Same Group

As table 3 shows, what is used as the comparable civilian labor force can make the difference between whether women or minorities are considered underrepresented. We compared for illustrative purposes each civilian labor force with the number of attorneys<sup>6</sup> and criminal investigators at the Justice Department as of September 30, 1990. Examples from table 3 follow.

- Age of the data can affect representation. White women criminal investigators and Hispanic women attorneys were both fully represented using 1980 census based occupation specific data but were underrepresented using 1990 Bureau of Labor Statistics occupation specific data. Census data from 1980 are still being used to measure representation in 1991.
- A very different representation level can be obtained if a broad category is used instead of one that is more job specific. The broad occupational categories that EEOC requires agencies to use are professional, administrative, technical, clerical, and other (PATCO). In table 3, white women criminal investigators and Hispanic women attorneys,

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<sup>6</sup>Includes only Justice attorneys in the GS and equivalent pay plans.

for example, were both severely underrepresented using census based PATCO data but were fully represented using census based occupation specific data.

- The educational specificity of the comparison group can also affect representation status. For example, women attorneys are fully represented using 1990 Bureau of Labor Statistics (BLS) occupation specific data but underrepresented using degrees conferred data. For our comparison, we used data accumulated by the Department of Education on degrees conferred by institutions of higher education. These data offer the advantage of educational specificity when that specificity is necessary. OPM has also used educational data to compare the representation of minorities with 4 or more years of college in the government's upper grades with the representation of minorities in the U.S. population having 4 or more years of college.

Table 3:

Different Criteria Produce Different Results

<u>Key Jobs</u>	Representation Index					
	<u>Women</u>		<u>Black</u>		<u>Hispanic</u>	
	<u>Total</u>	<u>White</u>	<u>Men</u>	<u>Women</u>	<u>Men</u>	<u>Women</u>
Using 1980 Census Based PATCO Data:						
Criminal Investigator	<b>30</b>	<b>29</b>	151	<b>26</b>	257	54
Attorney	104	112	90	72	79	<b>44</b>
Using 1980 Census Based Occupation Specific Data:						
Criminal Investigator	157	175	73	67	197	233
Attorney	241	245	117	250	121	125
Using 1990 BLS Occupation Specific Data:						
Criminal Investigator	82	91	56	<b>29</b>	154	88
Attorney	163	162	124	154	100	56
Using 1986/87 Degrees Conferred Data:						
Criminal Investigator	(Education requirements vary by Justice agency.)					
Attorney <sup>a</sup>	83	85	91	80	100	<b>42</b>

Note: Numbers in bold indicate areas of severe underrepresentation (less than 50 percent).

<sup>a</sup>We used law degrees (LL.B or J.D.) conferred by institutions of higher education during the 1986-87 school year as a comparison base for attorneys.

### Approaches All Have Certain Limitations

We found no single source of data that is without limitations. For example, census data, in addition to becoming outdated, may require adjustment for the under-counting of minorities, a matter that is currently before the courts. The Bureau of Labor Statistics' current population data, which we used for our 1990 analyses, are based on monthly household surveys that do not include enough households to provide a statistically sound representation of all minority groups. The degrees conferred data apply only to jobs with education requirements, do not cover as many occupations as census data, may lag a year or so in being current, and may require more data than that for a single year. Other limitations for these sources may also exist.

On the basis of EEOC's requirements, agencies develop affirmative action plans in 5-year increments, which are then updated annually. When the first 5-year plans were due in the early 1980s, 1980 census data was current. EEOC required agencies to use 1980 census data again for the second 5-year plans that were due in 1988. The next round of 5-year plans are due in 1992, and the EEOC expects that 1990 census data will be available for development of those plans. However, after showing EEOC officials table 3 and discussing the significant differences that it shows, an EEOC official agreed that a means of updating the census data needs to be explored.

Concerning the use of more general PATCO versus more occupation specific data, EEOC guidelines for the last two affirmative plan cycles provide as an alternative the use of occupation specific data. An EEOC official said that use of this alternative has heretofore not been encouraged by EEOC and few if any agencies have requested EEOC approval to use occupation specific data. However, unlike in the past, the EEOC plans to furnish agencies with specific data for occupations that they may use to develop the plans they will submit in 1992. PATCO categories can be too general if a job being compared requires particular qualifications and educational levels.

### MORE EMPHASIS NEEDED ON COLLECTING AND/OR ANALYZING HIRING, TRAINING AND DEVELOPMENT, PROMOTION, SEPARATION, AND APPLICANT FLOW DATA

The preceding sections have depicted where the government stands at different points in time in the employment of women and minorities. Another method of measuring the government's effort to reflect the nation's diverse population is to look at the personnel events that bring people into and out of the federal workforce as well as their progression in that workforce. These events include recruitment, hiring, training and development,

promotion, and separation.

Analyzing such events should help identify barriers to the entry and progression of women and minorities in the federal workforce and help arrive at ways to overcome the barriers. We will address how specific agencies identify and overcome barriers in the next phase of our work.

Generally, EEOC's requirements for collecting and analyzing personnel events is much less stringent than for measuring representation standings. In contrast to measuring representation, the EEOC lets agencies decide what to analyze and report regarding employee hiring, training and development, promotion, and separation. Consequently, our review of agencies multiyear plans showed significantly less objective personnel event data. The plans included mainly anecdotal information with limited supporting analyses. The agencies, for example, generally did not report analyses of personnel events affecting key jobs.

We recently received from OPM governmentwide data on hires, promotions, and separations for every other year since 1982. To date, we have been able to do analyses on the promotions and hiring data. Training and development data, however, cannot be similarly analyzed because of limitations associated with the data agencies and OPM collect and/or computerize.

We examined the promotion rates of women and minorities relative to all promotions to grades 11 through 15 in 1982 and 1990. We did this for all employees who were in key jobs in 1990 at 25 federal agencies.<sup>7</sup> Our observations from these results, which are shown in figures 7 and 8, include the following.

- At all grade levels, there was a positive change between 1982 and 1990 in the overall percentage of women and minorities promoted.
- Compared with 1982, the rate with which women were promoted in 1990 was successively higher at each grade level. For example, the promotion rate of women in 1990 was 70 percent higher at grade 13, 74 percent higher at grade 14, and 76 percent higher at grade 15.
- At every grade level, the percent of women promoted in 1990 exceeded the percent of women at that level in the workforce.
- Unlike for women, there was no consistent pattern in the

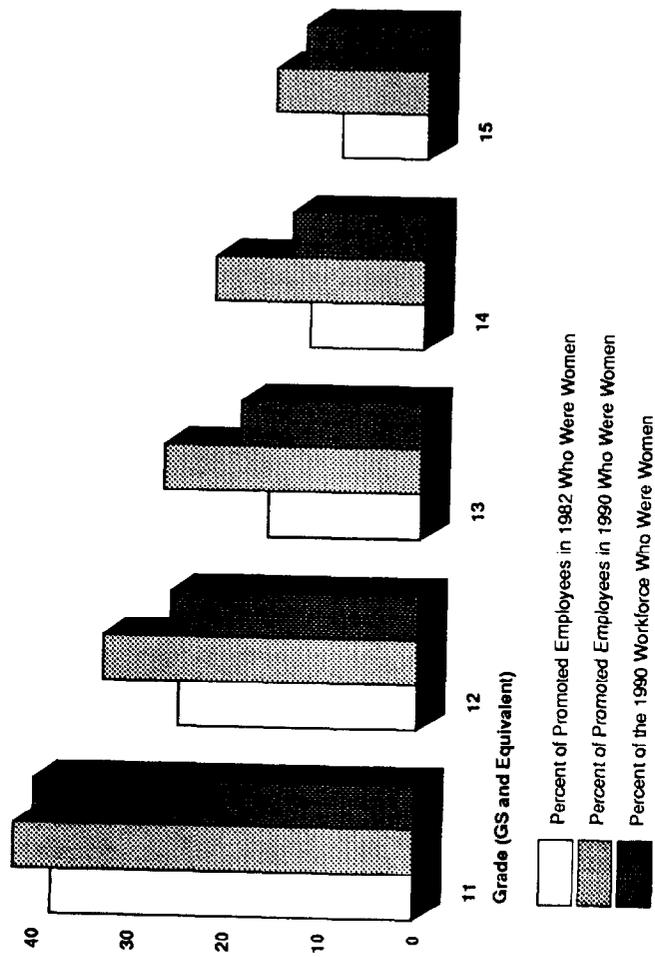
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<sup>7</sup>For the purposes of analyzing the promotion and hiring data, we assumed that the same jobs were key jobs in 1982 and 1990.

rate of change between 1982 and 1990 in minority promotions. For example, minority promotions in 1990 were 51 percent higher at grade 15, 36 percent higher at grade 14, and 50 percent higher at grade 13 than in 1982. The smallest change, still positive, was a 29 percent increase in minority promotions at grade 13.

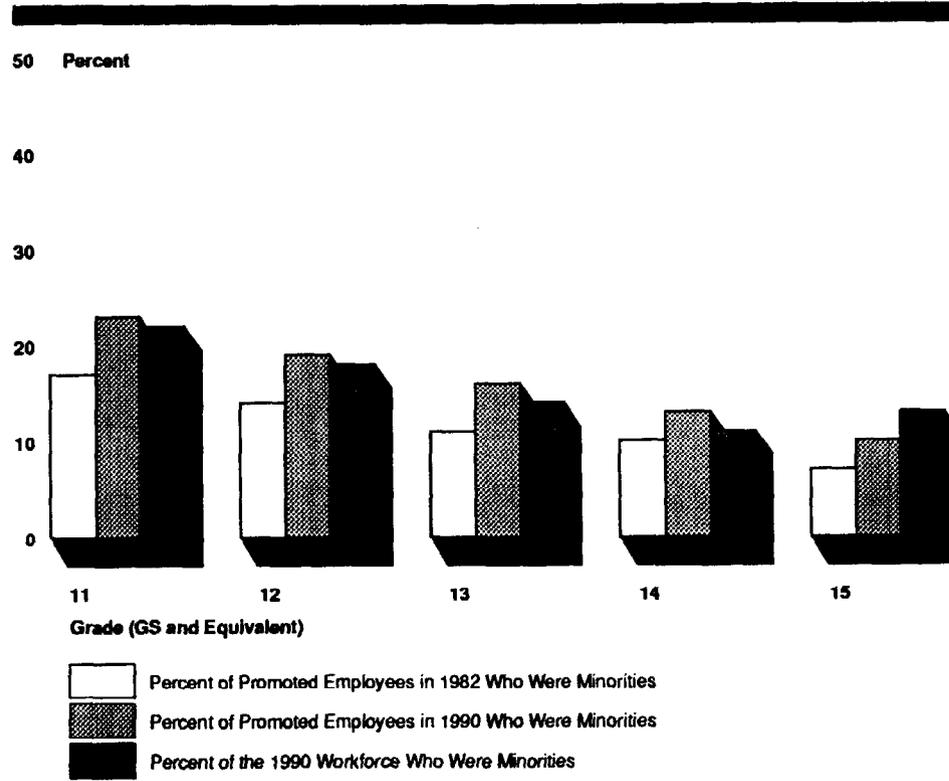
- At grades 11 through 14, the percent of minorities promoted in 1990 exceeded the percent of minorities at that level in the workforce. At grade 15, minority promotions were lower than the percent of minorities at that level.

**Figure 7: Women Promoted as a Percent of All Promotions in Key Jobs at 25 Executive Agencies**



Source: OPM Central Personnel Data File.

**Figure 8: Minorities Promoted as a Percent of All Promotions in Key Jobs at 25 Executive Agencies**

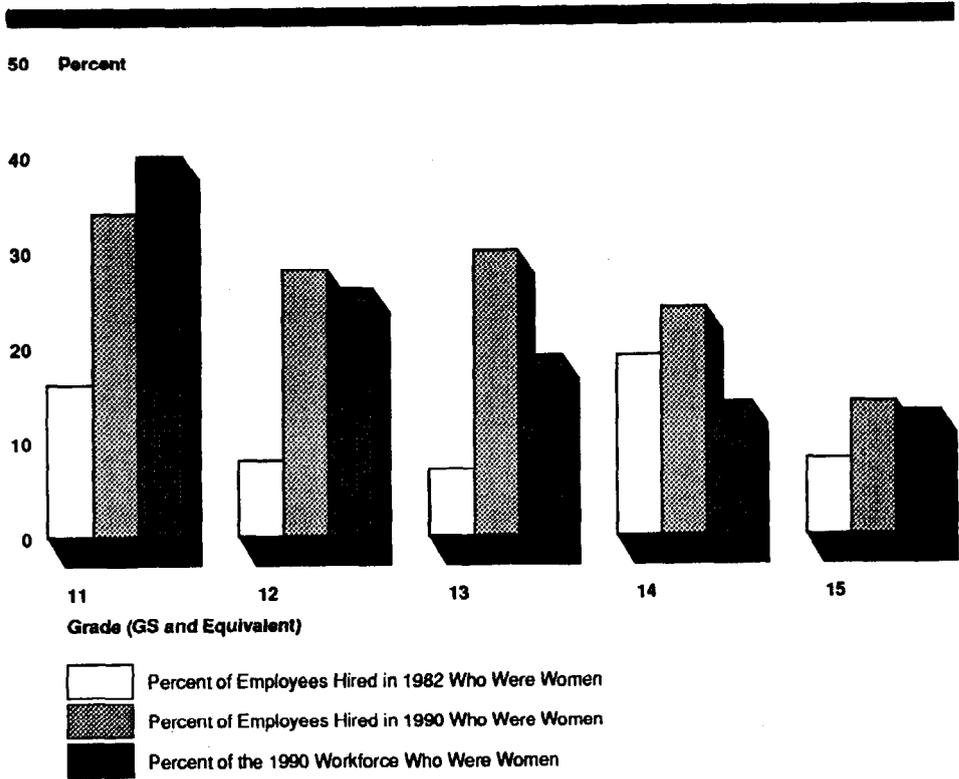


Source: OPM's Central Personnel Data File.

We also analyzed hiring data for 1982 and 1990 for key jobs in the 25 agencies. We examined the number of women and minorities hired relative to all hires in the key jobs. The results from these analyses are depicted in figures 9 and 10 and our observations include the following.

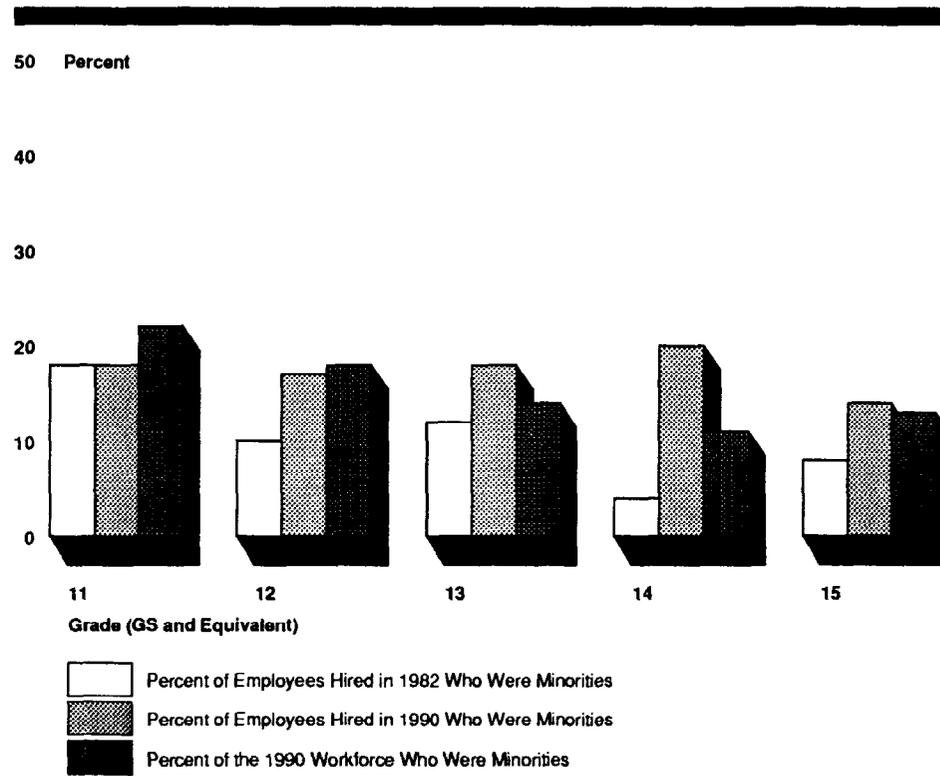
- At grades 11 through 15, there was a positive change between 1982 and 1990 in the percentage of women hired. For minorities, there was a positive change in grades 12 through 15. For grade 11, there was essentially no change for minorities between 1982 and 1990.
- The hiring rate for women in 1990 exceeded their presence in the 1990 workforce at grades 12 through 15. For minorities, their hiring rate in 1990 exceeded their presence in the 1990 workforce at grades 13 through 15.

**Figure 9: Women Hired as a Percent of All Hires in Key Jobs at 25 Executive Agencies**



Source: OPM's Central Personnel Data File.

**Figure 10: Minorities Hired as a Percent of All Hires in Key Jobs at 25 Executive Agencies**



Source: OPM's Central Personnel Data File.

As agreed, we will provide further analyses on the promotion and hiring of women and minorities in key jobs under a separate report that will be issued later. We will use a log linear analytical approach to analyze the data for that report.

Another personnel event that has not been thoroughly analyzed is recruitment. Agency recruiting efforts establish pools of applicants for given jobs. Hiring efforts refer to selecting and hiring individuals from those pools. Data that identifies the gender, race, and ethnic origin of job applicants, referred to as applicant flow data, is commonly acknowledged to be critical in enabling agencies to determine the extent to which women and minorities are applying for jobs and, where underrepresentation exists, whether their recruiting or hiring efforts are a cause for the underrepresentation.

During the early 1980s, OPM and the EEOC both required agencies to collect and analyze applicant flow data. From January 1981 to December 1983, both required agencies to use an OPM form specifically designed to collect applicant flow data. In December 1983, however, OPM's authorization to use the form expired, and OPM decided not to request reauthorization from the Office of Management and Budget because (1) no law or regulation required OPM to collect the data, (2) applicants provide the data on a voluntary basis and the data collected was not statistically reliable, and (3) collecting and processing the data was expensive. OPM later formally cancelled its requirement to collect applicant flow data. It has not renewed the requirement or replaced the form.

The EEOC continued to require agencies to collect applicant flow data until December 1987. Agencies faced a dilemma of having to collect data without a uniform form to do so. In January 1988, the EEOC told agencies that until it was successful in obtaining clearance for a data collection form, agencies were expected to develop and implement their own applicant flow forms, as needed, and to obtain clearance from appropriate approving agencies.

In 1989, the EEOC sent agencies for comment a proposed directive for the "Collection of Personal Background Data on Federal Job Applicants." The proposed directive would require the collection of applicant flow data and would provide a form to collect the data. EEOC planned to submit the proposed form to the Office of Management and Budget for approval.

At OPM's request, EEOC has not issued the directive. According to OPM officials, OPM made the request because it has begun to automate its hiring process and from that process it may collect, store, and analyze applicant flow data. Under court order, OPM is collecting and analyzing applicant flow data from persons who take the Administrative Careers With America examination. OPM data shows that this examination currently produces a very small

percentage of all federal new hires. According to OPM officials, the automation of the Administrative Careers With America examination is the first stage of automating the hiring process. Additional stages, which will include other examinations and government hiring authorities, including those administered by agencies, are planned. The extent to which applicant flow data will be collected from these additional stages is under consideration.

We contacted 36 departments and agencies to ascertain if applicant flow data are collected. The results were mixed. Sixteen said data were collected departmentwide or agencywide from applicants. Another 6 said data were collected at some offices but not all offices. Fourteen said no data were collected from applicants. Frequently, those who did not collect the data still believed it would be useful to have. These results suggest that OPM's automated process and/or EEOC's proposed management directive are needed.

In connection with separations, about two months ago we issued a report on the September 1990 reduction-in-force at the Mare Island Naval Shipyard.<sup>8</sup> From our work, it appeared that the reduction-in-force had a disproportionate impact on women and blacks. Women could not match the veterans' preference and seniority of male employees. In addition, the shipyard chose to eliminate a large percentage of its less-skilled blue-collar positions, a disproportionate number of which were occupied by blacks.

The shipyard did not recognize that the reduction-in-force would have a disproportionate impact until after layoff notices were issued, at which time the shipyard took steps to retain or rehire some women and blacks who had lost their jobs. The Department of Defense required the making of an impact analysis before a reduction-in-force to assess and guard against any disproportionate impact on women and minorities. The Navy, however, did not issue implementing instructions until after the Mare Island reduction-in-force. We raise this matter today to recognize that the effects of reductions-in-force on women and minorities will remain an important issue as the Department of Defense goes through its "downsizing" actions and as civilian agencies experience similar actions.

RECOMMENDATIONS TO THE CHAIRMAN  
OF THE EEOC AND THE DIRECTOR OF  
OPM

The representation levels of women and minorities in the federal

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<sup>8</sup>Defense Force Management: The 1990 Reduction-in-Force at the Mare Island Naval Shipyard (GAO/NSIAD-91-306, Aug. 30, 1991)

workforce have generally improved overall, and their representation in the government's middle and upper management levels has also improved. Nevertheless, certain groups remain underrepresented in the overall workforce, and white women and all minorities remain underrepresented in many of the key jobs that lead to middle and upper management. A large disparity exists between the relative proportion of white women and all minorities in the middle and upper grades and their proportion in lower grades.

By law, regulation, and practice, a process has evolved to identify and address instances of underrepresentation. However, not all parts of that process are working as well as they should. One part that is not concerns the statistical base agencies use to compare their workforces and gauge representation levels. Agencies are generally applying only one base in all circumstances, decennial census data by PATCO category. We do not believe that this base alone provides an appropriate comparison in all circumstances. We therefore recommend that the Chairman, EEOC, develop with other agencies, including OPM, the Department of Labor's Bureau of Labor Statistics, and the Department of Education, an inventory of benchmarks that agencies may draw from and apply in appropriate situations.

The identification of barriers requires analyses of data on such personnel actions as employee hiring, training and development, promotion, and separation. The EEOC lets agencies decide what analyses to make and report, and the agencies have only provided anecdotal information with limited supporting analyses in their affirmative employment plans. We therefore recommend that the Chairman, EEOC, in cooperation with OPM, (1) require agencies to analyze for affirmative action purposes hiring, training and development, promotion, and separation data; (2) provide agencies guidance on what to analyze; and (3) require agencies to include the results of those analyses in their affirmative employment plans. EEOC and OPM should use these results to compare the progress being made by individual agencies, using the experience of the better performing agencies to help those not doing so well.

The identification of barriers also requires the analyses of applicant flow data; that is, information on the gender, race, and ethnic origin of applicants. Since 1983, when OPM's authorization for a data collection form expired without a request for reauthorization, agencies have been on their own in collecting applicant flow data. Many agencies, however, are not collecting the data. OPM has begun to build a computerized hiring system that could collect and analyze such data. We recommend that the Director, OPM, in cooperation with the EEOC, examine options for collecting and analyzing applicant flow data and take prompt appropriate action.

## AGENCY VIEWS

EEOC and OPM officials agreed with our recommendations and said they believed that improved benchmarks and analyses of personnel actions will aid agencies to better identify underrepresented groups and better focus their affirmative employment efforts.

Identification of Agencies  
Whose Key Jobs We Reviewed

We reviewed the gender, race, and ethnic origin of people in 261 key jobs at 25 federal agencies. The purpose of this attachment is to explain how we selected the 25 agencies.

During the phase of our work that resulted in our May 1991 testimony, we reviewed the most recent multiyear affirmative employment plans, covering fiscal years 1988 through 1992, for the 34 largest federal agencies. These agencies, in fiscal year 1988, collectively employed about 98 percent of the federal work force. At the request of the Senate Committee on Governmental Affairs, we also included the National Archives and Records Administration's affirmative employment plan in our review.

Twenty-seven of the 35 agencies complied with EEOC requirements and identified major occupations in their multiyear affirmative employment plans. Eight did not. For this phase of our review, we categorized the major occupations into key occupations using a definition approved by the EEOC. This definition eliminated clerical jobs and jobs with less than 100 employees. The EEOC describes key jobs as those with 100 or more employees that offer advancement potential to senior level positions.

CPDF data were available to analyze the key jobs of 25 of the 27 agencies. The data were unavailable for the remaining two agencies. The names of the 25 agencies whose key jobs we reviewed follow.<sup>1</sup>

- Department of Agriculture
- Agency for International Development
- Department of Commerce
- Defense Logistics Agency
- Defense Contract Audit Agency
- Defense Mapping Agency
- Defense Investigative Service
- Department of Justice
- Department of Energy
- Department of Education
- Equal Employment Opportunity Commission
- Environmental Protection Agency
- General Services Administration

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<sup>1</sup>One of the largest federal agencies, the U.S. Postal Service, is not among the 25 agencies. The Postal Service's affirmative employment plan was among the plans we reviewed but the Postal Service did not identify major occupations and it does not report data to the CPDF.

- Department of Health and Human Services
- Department of Housing and Urban Development
- United States Information Agency
- Department of the Interior
- National Archives and Records Administration
- Nuclear Regulatory Commission
- Department of the Navy
- Office of Personnel Management
- Small Business Administration
- Department of Transportation
- Department of the Treasury
- Department of Veterans Affairs

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