



RECOMMENDATIONS TO BE REFERRED TO THE GENERAL  
ACCOUNTING OFFICE FOR APPROVAL  
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UNITED STATES GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

FEDERAL PERSONNEL AND  
COMPENSATION DIVISION

DECEMBER 30, 1980

B-201335

The Honorable Harrison A. Williams, Jr.  
Chairman, Committee on Labor and Human  
Resources  
United States Senate

The Honorable Alan Cranston  
United States Senate

Subject: Implementation of Affirmative Action  
Planning (FPCD-81-25)

This responds to your May 23, 1980, letter asking whether the Equal Employment Opportunity Commission should develop more objective standards by which to measure the progress of Federal departments and agencies in enhancing equal employment opportunity. As agreed with Committee representatives we (1) reviewed the status of the Commission's implementation of its December 11, 1979, instructions for preparing Federal affirmative action plans, (2) contacted selected agencies and obtained views on the instructions from officials responsible for preparing affirmative action plans, and (3) obtained information on the Commission's plans for monitoring Federal agencies' compliance.

On August 28, 1980, we briefed a Committee representative on the work we had done and agreed at that time not to pursue an evaluation of affirmative action planning because of the extensive changes being undertaken by the Commission as a result of its experience during fiscal year 1980. Instead, we agreed to provide a summary of our work and our overall observations. (See enc. I.)

AGENCIES WERE SLOW IN IMPLEMENTING  
AFFIRMATIVE ACTION PLANNING

While most Federal agencies submitted affirmative action plans to the Commission during fiscal year 1980, few met the

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February 1, 1980, required reporting date. As of October 9, 1980, 11 agencies and 5 major operating components had not submitted affirmative action plans. We were told by Commission officials that some of these agencies submitted plans later in October and November.

In discussing the Commission's December 11, 1979, instructions for developing affirmative action plans, agency officials noted the following problems:

- The lead time allowed by the Commission for developing and submitting an affirmative action plan was not adequate.
- The organizational level for which plans should be developed did not necessarily correspond to agency lines of authority.
- More training on preparing and implementing affirmative action plans was needed.
- The hiring goals that resulted from the Commission's required methodology for computing goals were not realistic.
- The detail required for the plan was too extensive.

Agency officials generally agreed, however, that the Commission's process was an improvement over previous affirmative action efforts. Specifically, they were impressed by the Commission's attempts to standardize Federal affirmative action planning and set measurable equal opportunity hiring goals.

The Commission is currently addressing some of the problems surfaced by agency officials through an interagency task force established to develop instructions for multiyear affirmative action plans. The task force is addressing the organizational level for which plans should be developed, the level of detail that should be required in the plan, and the type of technical assistance that the Commission can offer agencies. In addition, the Commission is considering training needs based on its experience during fiscal year 1980. Since a draft of multiyear instructions was not available at the time of our work, we could not evaluate the Commission's proposed approaches to resolving these problems.

A problem raised by agency officials which the Commission needs to address is the lead time allowed for submitting plans and reports. According to agency officials, the lead time for submitting both fiscal year 1980 affirmative action plans and accomplishment reports was not adequate. Few agencies were able to meet either reporting date.

In an October 10, 1980, letter to agency Equal Employment Opportunity officers, the Commission extended the period for fiscal year 1980 plans through September 30, 1981, and indicated that multiyear plans would be due in the spring of 1981. The Commission's instructions on preparing multiyear affirmative action plans were issued in draft form for agency comment December 3, 1980. Whether agencies will have enough time to develop their plans will depend largely on when the Commission issues its final instructions.

The problems concerning the Commission's methodology for computing hiring goals are discussed in some depth in our recently issued report entitled "Achieving Representation of Minorities and Women in the Federal Work Force" (FPCD-81-5, Dec. 3, 1980). (See enc. II.)

#### ONSITE COMPLIANCE REVIEWS WERE NOT CONDUCTED

The Commission has not implemented an onsite compliance review program. It had planned to develop and implement such a program during fiscal year 1980, to assure that agencies were complying with the goals and objectives of affirmative action. The Commission targeted seven agencies for initial onsite reviews.

The Commission Executive Director told us that the planned program had been premature. The proper scope of such reviews had not been agreed upon and the extent of staff that would be needed to perform these reviews had not been determined. Additionally, Commission experience during fiscal year 1980 indicated a need for more intensive technical assistance before beginning an indepth compliance review program.

Currently, the Commission does not plan to conduct onsite compliance reviews, except possibly on an experimental basis, until agencies have had experience with operating under a multiyear affirmative action plan.

#### OBSERVATIONS

We believe an effective affirmative action program will require the commitment and cooperation of all agencies. The

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steps being taken by the Commission to address some of the problems agencies encountered in developing affirmative action plans during fiscal year 1980 are beneficial in that agencies will be aware that issues they raised are being considered. The Commission should continue to be sensitive to agency concerns and problems in meeting affirmative action requirements.

One area in which the Commission has not evidenced the degree of sensitivity to agency concerns that we believe is necessary is the establishment of reporting time frames. Although we did not evaluate why agencies did not meet required reporting dates, in our opinion, if agencies are confronted with time frames they cannot realistically meet, they may not develop the type of commitment to meeting the Commission's requirements that is necessary for an effective program.

We discussed a draft of the enclosed summary of our work with the Chair, Equal Employment Opportunity Commission, and other Commission officials. They generally agreed with our observations. Their comments have been included as appropriate.

As agreed with a committee representative, a copy of this letter and the enclosures will be sent to the Commission Chair 2 weeks after the date of this letter and will also be made available to other interested parties.



H. L. Krieger  
Director

Enclosures - 2

STATUS OF IMPLEMENTING FEDERAL  
AFFIRMATIVE ACTION PLANNING BY THE EQUAL  
EMPLOYMENT OPPORTUNITY COMMISSION

Reorganization Plan Number 1 of 1978 transferred the responsibility for implementing Federal affirmative action planning from the Civil Service Commission <sup>1/</sup> to the Equal Employment Opportunity Commission (EEOC) effective January 1, 1979. Section 717 of the Civil Rights Act of 1964 as amended requires agencies to maintain affirmative action programs. It authorizes EEOC to approve agency plans for an affirmative action program of equal employment opportunity and to issue rules and regulations necessary to carry out its responsibilities.

EEOC's Office of Government Employment (OGE) was given the responsibility for directing Federal agencies on all aspects of the Government's equal employment opportunity program. EEOC designated fiscal year 1980 as a "transition year" for the affirmative action planning process. Its objective during the period was to introduce a systematic approach to affirmative action planning and program development that would include setting hiring goals for targeted occupations and timetables for meeting those goals. EEOC officials told us that a transition year was necessary as a learning experience for both EEOC and Federal agencies.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives were to (1) review the status of EEOC's implementation of its December 11, 1979, instructions for preparing Federal affirmative action plans, (2) obtain views on the instructions from officials responsible for preparing affirmative action plans at selected agencies, and (3) obtain information on EEOC's plans for monitoring Federal agencies' compliance.

We interviewed EEOC officials at headquarters and in two EEOC district offices. We reviewed records relating to EEOC's

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<sup>1/</sup>The Civil Service Commission was abolished as of January 1, 1979, and the Office of Personnel Management and the Merit Systems Protection Board and its Special Counsel were established in its place.

program for reviewing affirmative action plans and its plans for conducting onsite compliance reviews.

We contacted officials at the Departments of Energy, Interior, Housing and Urban Development, Army, and the Veterans Administration. We interviewed agency officials responsible for preparing affirmative action plans at the headquarters level and at some field installations. We specifically asked for their views of EEOC's Federal affirmative action transition year activities.

EEOC'S IMPLEMENTATION OF FEDERAL  
AFFIRMATIVE ACTION PLANNING

During 1979, one of OGE's major activities was to issue instructions for use by agencies in developing transition year affirmative action plans. EEOC Management Directive 702, Instructions for Affirmative Action (Equal Employment Opportunity) Program Plans for Minorities and Women for Fiscal Year 1980, was issued December 11, 1979. OGE also (1) developed plans and programs to help State, county, and municipal governments and educational institutions comply with employment policies of title VII of the Civil Rights Act of 1964 as amended, (2) provided direction for Federal affirmative action planning for handicapped individuals, and (3) provided staff support for the Interagency Committee on Handicapped Employees.

OGE's Federal agency affirmative action responsibilities for 1980 were initially to

- provide technical assistance to agencies,
- develop an affirmative action training program for agencies,
- develop instructions for multiyear affirmative action plans for the period following the transition year,
- review agency transition year affirmative action plans, and
- review agencies' compliance with their affirmative action responsibilities.

As of May 1, 1980, OGE had 54 employees--40 professionals and 14 clerical personnel. It is authorized a staff of 63. Thirty-eight of the authorized staff are assigned to Federal

affirmative action field units located in EEOC district offices in the 10 Federal regional cities. Field units are responsible for (1) helping Federal agency field offices develop affirmative action plans, (2) reviewing plans as assigned, and (3) providing affirmative action technical assistance, training, and coordination in their region.

Formal instructions issued  
on December 11, 1979

EEOC issued the first draft of the fiscal year 1980 Federal affirmative action instructions in June 1979. Based on comments raised during EEOC's review process, questions which needed to be resolved included:

- How to differentiate between professional and other occupations in using civilian labor force statistics.
- How to develop data that would compensate for outdated 1970 census data.
- How should the issue of the applicability of employee selection procedures be handled?
- What types of agency reporting should be required?
- What types of Federal affirmative action coordination and review should be done between EEOC and other agencies?

A revised draft was issued September 4, 1979. However, at a September 5, 1979, conference, agencies raised questions about (1) their paperwork burden as a result of affirmative action requirements, (2) use of civilian labor force data to set agency hiring goals, and (3) the relationship of the Federal affirmative action planning process to the Federal Equal Opportunity Recruitment Program. 1/ EEOC established a task force to address these questions and issued the final instructions on December 11, 1979.

EEOC's review process, which included the task force, made important revisions to the September 1979 draft. If the

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1/This program is aimed at eliminating underrepresentation of minorities and women by special internal and external recruitment strategies. The Office of Personnel Management has responsibility under Section 310 of the Civil Service Reform Act of 1978 for implementation.

September draft had been issued, agencies would have had a more complex process to undertake and a much larger paperwork burden. However, the delay in issuing final instructions shortened the lead time available to agencies for preparing plans. According to officials at several agencies, the final instructions did not provide sufficient lead time for Federal agencies to meet the mandated February 1, 1980, reporting date. As a result, EEOC received few affirmative action plans by the required date.

The December 1979 instructions required agencies to develop a two-phased affirmative action plan. Phase I, to be submitted by February 1, 1980, included:

- A work force profile illustrating the number and percentage of each race, national origin, and sex group in all occupations and grade levels within the agencies' work force.
- Determinations of underrepresentation 1/ for their six most populous occupations.
- Selection of two occupations as target occupations for setting transition year goals.
- An indepth analysis of employment policies and procedures which adversely affect employment opportunities for women and minorities.
- Identification of the available applicant pool including internal qualified and qualifiable sources.
- Hiring goals for the two targeted occupations.
- Recruitment and staffing strategies designed to provide alternatives to hiring procedures adversely affecting women and minorities. For most agencies this would be the Federal Equal Opportunity Recruitment Program plans submitted to OPM.

Phase II to be submitted by April 1, 1980, included:

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1/EEOC defines "determination of underrepresentation" as a comparison between the percent of a particular group, women and minorities, in a category of Federal employment and the percentage of the same group in the appropriate civilian labor force or professional labor force.

--An affirmative action program plan for two additional targeted occupations.

--An internal system designed to monitor actions to achieve the affirmative action goals.

On July 1, 1980, EEOC issued instructions--Management Directive 705--which required agencies to report their accomplishments for targeted occupations by comparing their work force profile on October 1, 1979, with their profile on September 30, 1980. This report was due November 1, 1980. EEOC officials said that few major agencies met this date. EEOC plans to grant extensions on a case-by-case basis. However, agencies must formally request an extension in writing.

EEOC review of agency  
affirmative action plans

The December 1979 instructions required:

- Agencies to submit their headquarters' plans to EEOC.
- Agencies' major operating components to submit plans to EEOC and to agencies' headquarters.
- Agency field installations with more than 500 employees to submit plans consolidated along regional lines to agencies' headquarters and to EEOC as an attachment to agencies' headquarters plans.
- Field installations with less than 500 employees were to be included as part of the overall agencies' plans. (These installations maintain separate plans which are not submitted to EEOC for review.)

On the basis of information supplied by the Office of Personnel Management, OGE expected to receive Phase I and Phase II plans from 297 agencies or agency components during the transition year. However, this estimate had to be revised and the number of plans expected was substantially increased.

	<u>Original estimate</u>	<u>Revised estimate</u>
Postal Service	10	310
Veterans Administration	1	246
All other agencies	<u>286</u>	<u>286</u>
Total	<u>297</u>	<u>842</u>

The significant increase in the number of agencies and agency components that EEOC expected to submit Phase I and Phase II plans was due to OGE's decision to accept separate plans from Veterans Administration regional centers and hospitals and from various Postal Service organizational units. This was done at the request of the two agencies to facilitate their plan development.

By October 1980, OGE had received 294 Phase I plans and 112 Phase II plans.

	<u>Received</u>	<u>Reviewed</u>	<u>Resubmitted</u>	<u>Reviewed after resubmittal</u>
Phase I	294	238	<u>a/</u> 64	<u>a/</u> 14
Phase II	112	112	-	-

a/Includes both Phase I and Phase II plans that were returned to the agencies for correction and subsequently resubmitted.

As of October 9, 1980, the following agencies had not submitted any affirmative action plans.

Large agencies (those with 500 or more employees)

Interstate Commerce Commission  
Office of Personnel Management  
State Department  
Veterans Administration  
Postal Service

Major operating components

Department of Justice Headquarters  
Law Enforcement Assistance Administration  
Defense Nuclear Agency  
Defense Health Service Command  
Defense Audit Agency

Smaller agencies (those with fewer than 500 employees)

Administrative Office of the U.S. Courts  
Federal Emergency Management Agency  
Federal Reserve System  
National Commission on Library and Information Science  
National Endowment for the Arts  
Water Resources Council

We were told by EEOC officials that some of these agencies submitted plans later in October and November 1980. OGE has issued several letters since February 1980, to elicit plans from agencies who missed the required due dates. The final step will be a meeting between EEOC and agency officials to discuss why plans have not been submitted and what can be done to get agencies to comply. For example, the Chair, EEOC, met with the Postmaster General on October 3, 1980, to discuss the Postal Service's plan.

OGE headquarters' staff is responsible for reviewing affirmative action plans of most agencies. Field units have been assigned responsibility for plans submitted by Veterans Administration regional centers and hospitals, by agency field installations with more than 500 employees, and agencies headquartered within the field unit's jurisdiction. Four headquarters' staff and two to four staff in each field unit location review plans.

OGE reviews a plan for completeness (that it includes all of the sections that the December 1979 instructions require), and accuracy (that the statistical computations are mathematically correct). The review generally does not go beyond the data submitted with the plan.

Incomplete and inaccurate items identified during the review are noted on a standardized check list and mailed with a cover letter to the agencies. Questions concerning changes are often answered by telephone. According to OGE officials, the shortage of headquarters staff has precluded them from providing a detailed written explanation of what is wrong with particular plans. In some cases, field units have provided detailed written explanations to agencies.

In addition to reviewing plans, OGE staff has visited agencies to lend technical assistance. For example, headquarters' staff had made 93 technical assistance visits as of October 9, 1980. OGE's Director told us these visits have included meetings with budget, personnel, EEO, and

top management officials and often lasted several days. We were told that more technical assistance visits are needed but OGE lacks the resources to do them.

#### AGENCY PROBLEMS WITH EEOC INSTRUCTIONS

Agency officials generally stated that the new process is better than any previous Federal affirmative action program. According to these officials, the new process attempts to standardize the Federal affirmative action process and provide a measurable goal toward which they can work. Previous affirmative action programs were process-oriented and measured success in terms of a wide range of goals, assessments, and achievements. EEOC has attempted to have agencies focus on the results-oriented goal of increasing women and minority Federal employee representation.

Agency officials indicated several problems in complying with EEOC's transition year affirmative action instructions, including

- the adequacy of the lead time for developing affirmative action plans allowed by EEOC's transition year instructions,
- the agency organizational level for which plans should be developed,
- the need for additional training on how to prepare and implement plans,
- unrealistic hiring goals because of the goal computation methodology required by the instructions, and
- the level of detail required by the instructions.

#### Inadequate leadtime for developing affirmative action plans

As indicated earlier, the timing of EEOC's Federal affirmative action instructions made it difficult for agencies to meet the required reporting dates. Agencies are facing similar problems with the accomplishment reporting requirements of EEOC Management Directive 705. The required reporting date was November 1, 1980. Agency officials told us that the reporting requirement comes at the end of the fiscal year when there are heavy demands on agency computer and statistical data base resources for various budgetary and management

reporting needs. During this time, it may take weeks for some agencies to produce and analyze the statistical data needed to prepare the report.

Organizational level at which plans should be developed

The December 1979 instructions assumed that agencies operate under a fairly rigid regional organization with field offices reporting to regional offices which report to a major operating component or to headquarters. Therefore, EEOC's instructions required agencies to develop affirmative action plans according to a regional organization. Not all agencies are organized in this manner. As a result, several agencies could not develop meaningful plans to conform with the instructions.

The organizational level of the plans was a particular problem for agencies such as the Departments of Energy and the Interior since their regional office structures are different from the standard Federal regional organizational structure. The Veterans Administration and the Department of Army commented on this problem but had made special arrangements with EEOC to accommodate the development of their plans to their organization. The Veterans Administration agreed to submit plans for each hospital and medical center and a separate plan for headquarters and smaller regional operations. The Department of Army submitted a national plan plus a separate plan for each of its 10 major subordinate commands but not for all field installations with more than 500 employees.

EEOC officials in commenting on this point stated that they were flexible and that accommodations were made for agencies such as the Veterans Administration when the problem was brought to EEOC's attention.

This problem may be alleviated in the proposed multiyear guidelines by allowing agencies to organize plans along established agency authority lines.

The need for additional training

According to agency officials, one of their biggest needs has been for training in how to develop and implement affirmative action plans. Some agency officials, stated that they received no training from EEOC during the transition year. Others stated that the EEOC training they received was primarily guidance on complying with Management Directive 702 instructions.

During 1979, EEOC developed a training program for agencies conducted jointly by EEOC and the EEO Training Institute of the Office of Personnel Management. The objectives of the 2-day course--given in November and twice in December 1979--were to

- provide participants an understanding of the legal requirements for Federal agency affirmative action programs,
- identify and practice statistical and analytical skills needed to comply with the requirements for affirmative action plans, and
- assess agency resources for implementing the fiscal year 1980 affirmative action program.

OGE officials told us that between 30 and 40 agency representatives attended each session.

Agency officials stated they need more training and technical assistance on the specifics of analyzing and removing barriers to achieving greater representation of minorities and women. Also, some agency officials stated they need training and technical assistance in preparing a plan for the Federal Equal Opportunity Recruitment Program (FEORP). Our report "Achieving Representation of Minorities and Women in the Federal Work Force" (FPCD-81-5, Dec. 3, 1980), discusses some of the problems experienced by agencies because of differences between FEORP and affirmative action instructions.

In commenting on this point, EEOC officials stated that the training program offered initially is recognized as a first step in the process of developing agency expertise in affirmative action planning. They told us that a more in-depth training program based on the experience gained during the transition period is planned in connection with the development of multiyear affirmative action plans.

EEOC goal computation can result  
in unrealistic hiring goals

Agency officials told us the hiring goal computation specified by Management Directive 702 can result in unrealistic goals because it

- requires the use of civilian labor force 1/ statistics as the basis for determining underrepresentation,
- requires the use of the higher of either local or national labor statistics in computing underrepresentation,
- requires doubling of the hiring goal for any severely underrepresented class (greater than 50 percent), and
- bases the computation of hiring goals on projections of vacancies which ignore situations such as the hiring freeze agencies have been under since February 1980.

Agency officials criticized the use of civilian labor force statistics as the basis for determining underrepresentation because the data was not current and because it did not take into account the relevant labor market for particular occupations. Agency officials criticized the use of the higher of either the local or national labor statistic because it overstates the degree of underrepresentation. The doubling of the hiring goal was criticized because it further exacerbated the problem of not taking into account the relevant labor market for an occupation.

Officials at one agency told us that following EEOC's methods for calculating goals can result in hiring goals for minorities and women that equal or exceed the total number of vacancies for a particular group. For example, one of its regional offices estimated 10 fiscal year 1980 vacancies for the Physical Science occupational group. To meet its 1980 goal, the regional office would have to hire 9, or 90 percent, women and minorities. In addition, the regional office has an estimated 16 vacancies in fiscal year 1980 in the engineering group. Using EEOC's formula, its goal is a total of 13, or 81 percent, women and minorities. According to regional office officials, the market availability of women and minority engineers in their geographic area is limited. As a result, these goals may be difficult to meet.

These officials further stated that Management Directive 705, required the agency to compute a new goal for the first

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1/The number of persons 16 years of age and over, except those in the Armed Forces, who are employed or unemployed and seeking employment.

6 months of fiscal year 1981 and add to it the nonaccomplished portion of the 1980 goal. This could result in goals that actually exceed the total number of vacancies.

In an October 10, 1980, letter to agency EEO officials, EEOC extended the transition year through September 30, 1981, and required that goals be established for fiscal year 1981. The letter did not comment on the requirement that unmet portions of fiscal year 1980 goals be added to fiscal year 1981 goals.

EEOC officials told us that EEOC recognized many problems with civilian labor force data in developing the December instructions and attempted to adjust the data to make it more realistic. EEOC used updated data, to the extent it was available, and differentiated between professional and all other occupations. EEOC officials further stated that they chose vacancy projections as a basis on which to compute goals because they believed agencies would be able to compute accurate projections based on their past experience. Vacancy projections are also used for budget purposes.

We discuss problems with goal computation in more depth in our report "Achieving Representation of Minorities and Women in the Federal Work Force" (FPCD-81-5, Dec. 3, 1980). (See enc. II.)

#### Instructions require too much detail

The December 1979 instructions required each agency to develop a work force profile indicating the numbers and percentages of employees in each race, sex, and national origin group in all occupations and grade/pay levels. This analysis was to be used to develop a transition year profile showing the degree to which minorities and women are represented at all levels and in all occupations in the agency. This profile and subsequent determinations of underrepresentation are prerequisites for targeting occupations for affirmative action.

Also, the December 1979 instructions required agencies to analyze promotional data for the targeted occupations. This analysis was required for each grade and level of authority (i.e., supervisory, managerial, and other) within the targeted occupations. The promotion data was required to be reported for the last 5 years (or for the period that such data is available, whichever is longer).

EEOC believed this promotional data would be useful in identifying barriers to equal opportunity and might be useful

to agencies in determining where innovative training and other programs should be developed to increase representation in middle and upper management.

According to agency officials, the requirement to break down the information by occupation and by grade level within occupations caused the affirmative action planning process to be time consuming and complex. Organizations found themselves computing numbers with little meaning or significance, for example, in some cases, agencies computed fractional hiring goals.

#### EEOC'S COMPLIANCE REVIEW PROGRAM

OGE was to develop and implement a review program to assure agencies were complying with the objectives of affirmative action. To accomplish this function, OGE targeted seven agencies for onsite compliance reviews during the transition year:

- Department of the Navy.
- Postal Service.
- Veterans Administration.
- Federal Communication Commission.
- Department of Commerce.
- Department of the Interior.
- Department of Health and Human Services.

Beginning in March 1980, OGE provided technical assistance to the seven targeted agencies in developing affirmative action plans and began developing a staff guide for use in conducting onsite compliance reviews.

OGE staff performed a test compliance review at the Tennessee Valley Authority during early June 1980. This was the only onsite compliance review performed during fiscal year 1980. At the time of our work, OGE was drafting a report based on this test.

EEOC has determined that no further onsite compliance reviews, except on possibly an experimental basis, will be conducted until after agencies have developed and implemented multiyear affirmative action plans. EEOC officials told us

that in meetings with agencies they became aware of the need for an even greater emphasis on technical assistance than originally envisioned. Furthermore, EEOC's Executive Director stated that

- the staff guide was too far-reaching and would have gone beyond affirmative action planning,
- the transition year was to be "developmental" and a comprehensive compliance review conducted during this developmental period could have negatively affected future Federal agency acceptance of the affirmative action program, and
- compliance reviews would have significantly increased the staff OGE would need and would have limited the extent of technical assistance that could be provided.

EEOC PLANS FOR FEDERAL  
AFFIRMATIVE ACTION PLANNING

During fiscal year 1980, EEOC planned to develop instructions for agencies to use in preparing multiyear affirmative action plans. Multiyear plans are defined by EEOC as an affirmative action planning cycle which will extend beyond one year and coincide with the agency's ongoing budgetary and personnel management planning to address both long term and short term goals.

In addition to EEOC's plans for multiyear instructions, changes are taking place in EEOC's proposed program for on-site compliance reviews and the organization of OGE. Each of these areas is discussed below.

Instructions on multiyear  
affirmative action planning

In July 1980, EEOC established an interagency planning task force to develop multiyear instructions. In addition to EEOC staff, the task force included representatives from the Office of Federal Contract Compliance, the Department of Health and Human Services, and the Office of Personnel Management. The task force was headed by the Executive Director of EEOC.

The task force was divided into subgroups, each responsible for drafting an option paper specifying alternatives for dealing with the following topics.

1. What data should be used in computing underrepresentation and in setting goals?
2. What process should be followed in multiyear planning to identify, analyze, and address impediments to the elimination of underrepresentation?
3. What approach should be followed for multiyear planning covering the mechanics of plan development and submission?
4. What are the options for incorporating work force dynamics and personnel transactions into multiyear affirmative action plans?
5. What are the options on Commission oversight of affirmative action in the Federal sector?

The option paper from each subgroup was submitted for consideration by the entire task force during the first part of August 1980. On the basis of these papers, the task force is developing a Management Directive on multiyear affirmative action planning. A draft management directive was released for agency comment on December 3, 1980.

#### EEOC's planned compliance program

Compliance is one of the areas being considered by the interagency task force established to develop multiyear affirmative action planning instructions. The option now being considered by EEOC calls for a three part oversight program consisting of technical assistance, monitoring, and compliance reviews. Technical assistance would consist of both training developed for all agencies and direct work with agencies to solve specific problems. Agencies would be monitored to insure they are meeting the objectives of their affirmative action plans. Compliance reviews would be an indepth look at an agencies practices and procedures for correcting underrepresentation.

Technical assistance would be emphasized in the first few years of the oversight program. Monitoring of results in relation to the plans would begin in fiscal year 1981. Onsite, indepth compliance reviews would not begin until after the multiyear program cycle has begun. EEOC officials told us they plan to conduct some onsite compliance reviews on an experimental basis during fiscal year 1981. However, agencies at which those reviews would be conducted have not been selected.

EEOC plans for reorganization  
of OGE field units

EEOC currently plans to reorganize the OGE field units by placing them under EEOC District Directors. During the transition year, field units were established in the 10 EEOC district offices located in the Federal regions. The field unit managers reported to OGE headquarters. According to the Director of OGE one advantage of this organization was that it provided a coordinated National thrust and minimized the potential for differing approaches to the program in each of the regions.

EEOC's Executive Director indicated that reporting to District Directors would provide for more support for the Federal affirmative action program in the district offices. EEOC's Chair indicated that the complexity of the Federal affirmative action program requires its integration with other district office functions.

According to EEOC officials the Federal affirmative action staff would continue to be located in the 10 regional cities and would be dedicated to the Federal affirmative action program. Staff would not be rotated on various EEOC district office assignments.