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Advisory Council's 1978 Report

March 1979

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U.S. General Accounting Office, Washington, D.C.

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What Is the EEO Advisory Council?

The General Accounting Office's Equal Employment Opportunity Advisory Council (EEOAC) is an 18-member group representing:

- 15 offices and divisions in GAO,
- GAO Black Caucus,
- GAO Employees Association, and
- National Federation of Federal Employees, GAO Lodge No. 1822.

Also, the Council has two permanent, nonvoting advisors who provide input concerning handicapped employees and personnel management.

In September 1971, with EEO problems becoming apparent both to GAOers and the public, GAO management established the Council. Its purposes are:

1. To provide a medium for employees to participate with management in EEO matters.
2. To improve communication by providing a channel for employee attitudes, aspirations, and problems in EEO matters to surface and be made known to management.
3. To help develop EEO Action Plans by providing substantive and precise recommendations for plan content, with opportunity for comment on final proposals before submitting them to the Comptroller General.
4. To make recommendations to the Comptroller General, Deputy Comptroller General, and EEO Director regarding Office policies, practices, and procedures as they affect equal employment opportunity.
5. To comment on proposed changes to Office-wide policies and practices which affect the treatment of GAO employees.

The Council considers EEO matters in all areas of GAO, including:

- Job restructuring and classification.
- Discrimination.
- Personnel policy.
- Effectiveness-appraisal ratings.
- Recruiting and training.
- Upward Mobility Program structure and implementation.
- Counseling.
- Competitive selection and promotions.

The Council's major undertakings include making recommendations to be included in the annual GAO Affirmative Action Plan and meeting annually with the Comptroller General to discuss the Council's concerns and get his responses.

Some recent concerns were:

- More career development opportunities are needed for support staff.
- Divisions and offices need more guidance on personnel functions.
- Minority and women census shows deficiencies.

EEO Advisory Council¹



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¹Because Advisory Council elections will have been held by the time this report is published (March 1979), some Council members will have "moved on." An updated poster will be distributed in April or May.

- Competitive selection system has not promoted equal opportunity.
- GAO should develop an EEO program evaluation model.

These concerns, and recommendations affecting them, will be discussed in more detail later in this booklet.

The Council recognizes that changing long-established habits and methods of operation which contribute to EEO problems is at best difficult—both for persons subject to discrimination and for those who discriminate, either knowingly or unwittingly. The Council feels, however, that GAO has moved toward resolution of many EEO-related problems; it hopes to continue to help GAO move toward total integration of EEO into all aspects of personnel relations and management. But, for the Council to be truly effective, GAOers must continue to help identify problems and formulate ideas to alleviate those problems.

EEOAC's Annual Meeting With the Comptroller General

Each year the EEO Advisory Council meets with the Comptroller General to discuss various EEO matters in GAO. Below is a summary of our July 26, 1978, presentation to Mr. Staats and our assessment of where GAO stands as of March 1979.

Following this summary is our 1978 Annual Report, the Comptroller General's September 1978 written response, and our conclusions.

Summary

More career development opportunities are needed for support staff

We told Mr. Staats how pleased we were to see that (1) the Office is developing a career management system for support staff and (2) a key element of this system is the creation of a paraprofessional, management analyst assistant position to bridge the gap between auditor and secretary.

The Office of Personnel is now responsible for carrying through with the program and is beginning to work out the details. The EEOAC is confident that gradually new career opportunities will be available to support staff. We expect that over the years ahead much of GAO's administrative tasks will be performed by these paraprofessionals.

Divisions and offices need more guidance on personnel functions

We reported to Mr. Staats what we had found when reviewing division policies regarding career ladder promotions, training, career management, and awards. Except in the awards area, criteria for personnel actions are limited or non-existent. While this does not automatically lead to discrimination, it certainly increases the possibility that abuses can occur.

Also, we reported that divisions have little experience in many personnel areas, and employees are not being effectively counseled on what training and experience they need for advancement. We recommend that the Office of Personnel provide divisions with better technical assistance and more specific guidelines for personnel actions and make sure Office policies are consistently applied.

The Office is taking initiatives in a number of the areas we mentioned. For example, it intends that: 1) BARS will establish specific performance appraisal criteria; 2) its training policy and needs will be defined; and 3) career counseling will be improved through new training efforts.

Minority and women census shows deficiencies

GAO's overall statistical profile continues to reflect serious imbalances in the representation of minorities and women. As of May 20, 1978, white men comprised 95 percent of the GS-16 to -18's, 96 percent of the GS-15's, 93 percent of the

GS-14's, and 90 percent of the GS-13's. Virtually no improvement has occurred at these higher levels. Within the career ladder, however, thanks to recent recruiting successes, minorities and women are making gains.

Competitive selection system has not promoted equal opportunity

We reported that minority men and especially minority women are doing very poorly compared to white men and women. The Office of Internal Review also concluded this in their September 1978 report, remarking that the Competitive Selection System is not achieving its equal employment opportunity objectives. By January, this unfortunate situation had not changed. We recommended that the Office find out why, but it has taken a "wait-and-see" approach.

We also told Mr. Staats that employees have two common perceptions about the Competitive Selection System—that most persons receiving promotions have been preselected and upper-level hires are at a disadvantage.

The Office is now considering proposed changes to Competitive Selection and has asked EEOAC and other advisory councils for comments. Decisions should be made very soon.

GAO should develop an EEO program evaluation model

While many excellent studies have examined the Office's EEO posture, we have been concerned that on-going evaluations are fragmented and do not relate to any set of established goals, that a planning and evaluation model has not yet been developed, and that invaluable in-house expertise in evaluating other agencies' EEO programs (FPCD and HRD Civil Rights audit groups) is not being tapped.

Top management agreed with us and set up an intra-agency group of GAO's experts in EEO evaluations, plus advisory council, EEO Office, Personnel, and OMPS representatives. On March 1, 1979, this group began work on developing a comprehensive EEO evaluation program.

More Career Development Opportunities Are Needed for Support Staff

Advisory Council's Statement

In a recent [June 19, 1978] issue of the *Management News*, it was announced that the Office is going to develop a career management system for the support staff. Administrative assistant and paraprofessional positions are alternatives being studied. This is perhaps the most promising news ever for GAO's support staff, and we applaud this initiative.

We recently prepared and distributed to over 100 support staff a questionnaire on career development. While this was not a scientifically developed survey, we believe that the questionnaire was distributed to a sufficient number to ensure that the results are representative of the views of all support staff. More than 80 percent of those responding felt that they could handle more responsibility, and that GAO needed an administrative assistant position; roughly 70 percent wanted to be trained to become administrative assistants.

Our survey confirmed the findings of the Women's Advisory Committee and CED's Rensis Likert Associates (RLA) surveys. The Women's Advisory Committee found that of all the concerns women (mostly support staff) have, "alternative career development avenues" and "upward mobility" were the two most important. The RLA study concluded that "chances for getting ahead are seen as significantly less favorable" by secretarial/clerical staff.

Responding to our questionnaire, the support staff identified many tasks they could do which are now done by members of the professional staff:

- processing reports
- writing short letters and memos
- compiling data
- researching necessary information
- processing forms, such as travel orders and vouchers
- taking notes at staff meetings and interviews
- preparing the monthly status of assignments

If a GS-7 administrative assistant could perform administrative tasks which are often now carried out by, say a GS-13 or -14 auditor, the results could be substantial. Productivity and job timeliness will be improved because, for example, the audit staff are freed to do other job tasks, and cost savings will be realized because administrative activities are performed by a lower-graded staff member.

Our questionnaire turned up another interesting response. Many support staff prefer career opportunities as administrative assistants rather than as auditors (through upward mobility), because they could continue working in the area in which they are the most knowledgeable.

In conclusion, administrative assistant and paraprofessional positions can increase GAO's productivity and, by opening much desired opportunities, boost

REPORT DEADLINES AND AUDIT WORK



**SUPPORT
STAFF**

AUDITOR

the morale of the support staff. *Recommendation: GAO should attach the highest priority to developing a career management system for the support staff.*

Comptroller General's Reply

We appreciate the committee's support for our efforts in this area. Needless to say, however, we are still some distance away from realizing our goals in this area and there are many obstacles to overcome.

As was recounted in the meeting, two previous efforts were made to implement the administrative assistant concept. Neither met with a great deal of success. While selected individuals benefited from the process, the results were generally negative in terms of establishing a reliable pattern of jobs to be followed throughout the agency. Although these efforts did not produce the desired results, we think the environment has changed since then. Consequently, we have decided to make a new attempt at structuring career opportunities for support staff.

In general, we favor the establishment of career lines for administrative officers (AO) at headquarters (they have existed in our regions for a number of years), including the possibility of satellite administrative assistants at the larger audit sites. Career progression for AO's at headquarters would be GS-5/12 in large divisions and administrative assistants GS-5/6/7 may be feasible at large sites. This support is, however, predicated on three essential conditions: (1) that it would be clearly understood that an administrative assistant is more than an alternate title for a secretary and that these are distinct classifications embodying different types of work; (2) that higher level administrative duties performed by professional auditors actually be delegated; and (3) that professional audit staff presently performing purely administrative duties be phased back into the mainstream of audit work.

There are a number of obstacles that we are already aware of and others may appear as we proceed. One of the principal obstacles we see now is the CSC classification system which limits our ability to create new or non-traditional career paths. A second, and perhaps the more difficult one, will be resistance by auditors to relinquish those lower level auditing tasks which, by tradition, have been performed by auditors, but could more logically be performed by lower level staff.

The commitment has been made to carry through on this program. We are faced, however, with limited resources and the level of effort dedicated to this program will have to be balanced in relationship to other high priority programs.

Advisory Council's Conclusion

We were concerned that the Comptroller General's response indicated only a narrow range, and a limited number of opportunities would be available for support staff. So we asked Mr. Staats recently to clarify the Office's policy on this issue. The Office has just reaffirmed its intent to create paraprofessional, management analyst assistant positions.

The Office of Personnel is now responsible for carrying through this policy. Its Director told us that his staff is beginning to work out such details as job classifications and descriptions, initial number of positions, and training needs.

We are confident that gradually over the years ahead, positions will be created to bridge the gap between secretary and auditor. The key to success here, in our view, will be the Office's ability to put together a well-planned and -designed program.

Divisions and Offices Need More Guidance on Personnel Functions

Advisory Council's Statement

The authority for various personnel functions has been substantially delegated to divisions and offices. We randomly selected three GAO divisions (CED, HRD, and FPCD) and reviewed their policies regarding career ladder promotions, training, career management, and awards. We found that divisions, without experience or knowledge in personnel activities, need—and are not getting—technical assistance from the Office of Personnel and OMPS. We also found that the policies of the divisions were largely inconsistent and, except in the awards area, criteria for personnel actions were limited or non-existent. While inconsistent or poorly spelled out policies do not automatically lead to discrimination, they certainly increase the possibility that abuses can occur.

Career Ladder Promotions

In each of the divisions we reviewed there are no criteria for career ladder promotions. The only guidance on promotions is the one-year in-grade requirement mandated by the Whitten Amendment. Many employees and supervisors we talked to were extremely confused over what, in fact, the criteria are or should be for promotions. In most cases supervisors simply make up their own criteria and submit employees' names for promotions based solely upon personal judgment.

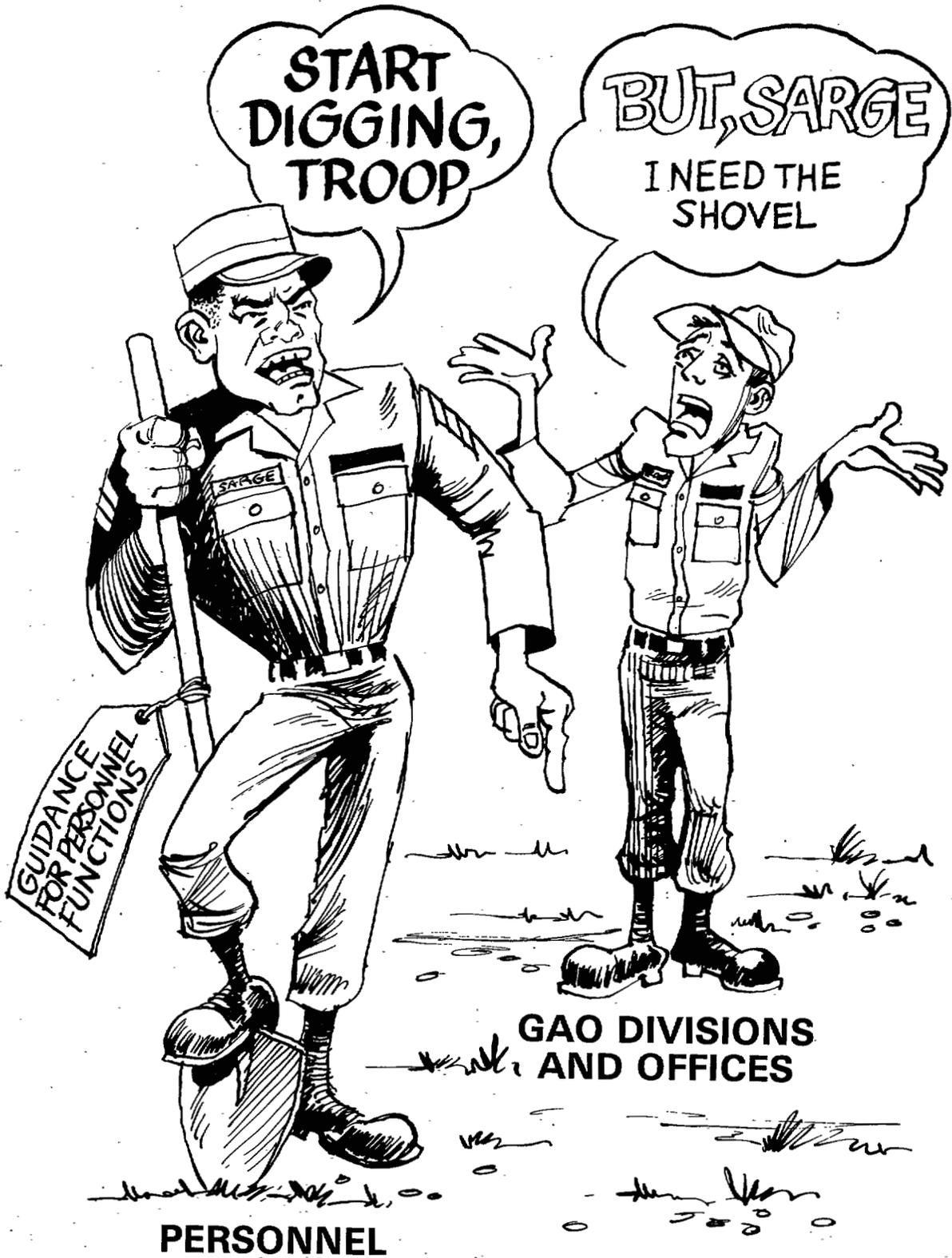
Last year, we also noted this lack of criteria. We were told that "the [Career Management System] Task Force is working on standardized, behaviorally-based criteria for promotions within the career ladder." Unfortunately, nothing has been implemented. The continued lack of guidelines, we believe, increases the possibility of discriminatory promotion practices.

Training

In each of the divisions reviewed we found training allotted in a haphazard and inconsistent manner. Each division receives a given number of allotments for various courses, but we could not determine what criteria are used to select individuals for training. Speaking to both officials and employees we found that there are, in fact, no criteria and that it is up to each employee and supervisor to make sure adequate training is received. No training courses are actually required. None of the divisions we reviewed have done any analyses to determine whether all employees are receiving their fair share of training. A major problem is that when they were given their training functions the divisions received no technical assistance from Personnel or OMPS. The divisions told us they did not have any prior experience and were, for some time, not sure what they should do.

Career Management

We could find no evidence of any type of career counseling in our sampled divisions. Each employee is responsible for his/her own career development and



no guidelines or guidance are provided by the divisions. The divisions do not periodically review career progressions of employees or attempt to determine whether females and minorities are receiving opportunities for career enhancing-type assignments. Employees we spoke with are extremely critical of the lack of career management and feel that the divisions should make sure that employees have equal access and opportunities for positive career progressions. The divisions told us that they had neither the experience nor the resources to provide effective career management. They noted this is another area where they need technical assistance.

Awards

Awards is the only area in our review of decentralized personnel policies where a recognizable system is in effect. In each of the divisions we reviewed, there are selection committees and explicit criteria. Our major concern in this regard is the need for general uniformity among divisions and offices. We agreed with CED's conclusion, in its study of awards last year, that more consistency is needed, and we are pleased to see that the Office's Rewards Task Force will be looking at this issue. *Recommendations: When it delegates personnel authority, the Office of Personnel should:*

- *provide where necessary any technical assistance divisions and offices need,*
- *prepare specific criteria for personnel actions, or help the divisions and offices do so, and*
- *monitor periodically to make sure the divisions are carrying out their authority in a consistent and effective manner.*

Comptroller General's Reply

The specific functions highlighted in your report would suggest that they have been or more properly should be performed by our Personnel unit. Underpinning the actions initiated over the last year is a basic principle—development of staff and its associated activities (training, counseling, awards, etc.)—and this is the basic responsibility of line management. Staff offices do have a responsibility for assisting in these activities, intervening when necessary, and providing an appropriate level of oversight.

Movement in this direction has not been easy and will require continued reinforcement. We share your concern regarding the need for guidance and assistance to our line managers as they take ownership of these activities. In general, we think that we have done a reasonably good job of providing policy and procedural guidance. We do see a need to provide certain types of training to our managers in these areas. More importantly, however, we see the need for line managers to make the necessary commitment, in terms of people and time, to the proper execution of these staff development activities. As is apparent, the level of commitment to this vitally important function varies among the divisions.

In addition to raising the general issue of delegation, your report mentioned several specific areas: career ladder promotions, training, career management, and awards.

1. Career ladder promotions

The report notes that there are still no established criteria for promotions. The criteria will be an integral part of our upcoming performance appraisal system. We have spent considerable effort since last year in making sure the new performance appraisal system will be compatible with the teams approach. The criteria should be available this winter when the new BARS performance appraisal system is ready for implementation.

Over the past 10 years, we have tried both rigid, centralized promotion controls and discretionary, decentralized procedures. Both approaches have the potential for abuse and are variously praised or condemned by those who feel that promotions come quickly or slowly. At present, the divisions and offices have significant flexibility in setting promotion guidelines and, accordingly, are properly answerable to their own employees.

The BARS project will alleviate, to an extent, the lack of uniformity, but it would be unrealistic to expect that it will ensure a career promotion system that will operate in an identical fashion throughout the agency. We believe that the career ladder system has far less potential for disparate treatment than any other promotion system we have had in the past. We will continue to work towards ensuring that the career promotion system is a fair and equitable one.

2. Training

The EEOAC's major concern seems to focus on internal training. Personnel currently has responsibility for entry-level training for auditors. We provide guidance to the divisions and offices regarding who should attend and when. Those courses (orientation, Seminar I and II) are required for all GS-7 and 9 auditors.

The Organization and Management Planning Staff has distributed to all division and office directors and planners a booklet listing all internal courses and the criteria for attendance. Guidance on external training has been provided in GAO Order 0835.1.

One point in your report requires special comment. The statement was made that none of the divisions you reviewed had done any analysis to determine whether all employees are *receiving their fair share of training* (emphasis added). We understood your concern and, as stated above, certain types of training are mandatory and must be attended by all employees. Other forms of training are optional and attendance at such training should be the

result of matching needs with available training. Individuals should have an equal opportunity to compete for such training. However, the assumption that each employee is entitled to "their fair share of training" is incompatible with this principle and could lead to a wasteful usage of limited resources.

The Office is presently engaged in a number of major projects in the training area. These include the development of a revised training policy and the training needs assessment (TNA). Our efforts in the training area are aimed at tying training to the performance appraisal and counseling systems. We expect to develop a set of guides which will assist local individuals, but the responsibility will still be with each employee and supervisor to make sure adequate training is received.

3. Career Management

In recent years, a number of developments have resulted in a reduction in people's expectations for career advancement. Changes in the career ladder, the competitive selection program, and perceived threats of down-gradings have taken their toll and have raised the group consciousness about the individual's responsibility for career management. The single greatest impact, however, has been the weakening of the sponsorship chain which for so long spelled security and virtually guaranteed advancement.

Experience and careful observation of our workforce has taught us that neither performance appraisal nor supervisory training is an adequate substitute for the individual's initiative in actively planning a career. We should strive to provide tools for management to advise their staffs on career decisions; however, advancement cannot be guaranteed because of the many contingencies, such as position availability, management constraints, and merit competition, that impact promotability.

The report notes that the divisions do not have a tracking and monitoring mechanism. As the implementation of the teams approach continues, this will no doubt become a major function of divisional and regional management. Moreover, we are persuaded that as the divisions recognize the need for more intense involvement in this area, resources will be committed to carry out these responsibilities effectively.

4. Awards

We agree that it is incumbent upon us to periodically monitor delegated authority for incentive awards and to bring about corrective action if inequities or abuses are uncovered. However, total uniformity between the divisions and offices in setting criteria for their own awards would defeat the purposes for which that authority was granted. We favor some diversity within the guidelines contained in GAO Order 0824.1.

We prefer to defer action in this area until after the Rewards Task Force has made its recommendations.

Advisory Council's Conclusion

On a wide range of personnel matters, the Office is taking new initiatives, and, at this stage, the results cannot be effectively evaluated. We would like to emphasize two key points. One, individual initiative plays a crucial role in career development, but the employees are part of an organization, too. The Office must inform them which training and experience it considers important for advancement. Two, equal employment opportunity is best served by clearly defined and consistently applied Office policies, regardless of who—the divisions or Personnel—carries out those policies.

Minority and Women Census Shows Deficiencies

Advisory Council's Statement

GAO's overall statistical profile continues to reflect serious imbalances in the representation of minorities and women (for details, see Appendix I):

- Of GAO's total workforce, 38.5% are minorities and women. Yet only 7.2% of the total minorities and women in the workforce are GS-13 and above.
- White males continue to represent over 90% of the workforce at *all* levels GS-13 and above.
- At the GS-14 and 15 levels, where most of the team leaders are being chosen, only 5.7% (55) of the 961 employees are minorities and women.
- The number of minorities and women at the GS-12 level has increased by over 50% (96 individuals) in the past year; but the number at the GS-13 level has increased by only 3.5%.

Comptroller General's Reply

The statistical profile will continue to be unbalanced due to the structure of the labor market and the lack of flexibility in the Federal classification and merit selection systems. Substantial gains have been made, but since our growth pattern of the early 1970's has slowed considerably, it will take a long time to overcome past self-selection and staffing practices.

Advisory Council's Conclusion

Improving career opportunities for support staff and giving minorities equal opportunities in the competitive selection process will do much to overcome "the structure of the labor market" and "past staffing practices."

Excellent progress has been made in the hiring of minorities and women at the entry levels, but, as we show in the next section, minorities' chances of moving up are still not as good as white males'.

Competitive Selection System Has Not Promoted Equal Opportunity

Advisory Council's Statement

Impact on Minorities

We reported last year that less than 10% of the selections made had been minorities and women. Another year has passed, and there has been virtually no progress made. Again, we must report that less than 10% of the selections made, as of April 1978, have been minorities and women (see Appendix II). No minority women, only 4 minority men, and 24 white women have been selected, versus 275 white men.

Minorities are doing very poorly compared to white men and women, as the following statistics show:

1. The percentage of applicants making certificates:
 - 50% of white women
 - 42% of white men
 - 24% of minority women
 - 25% of minority men
2. The percentage of certified applicants being selected:
 - 55% of white women
 - 34% of white men
 - 0% of minority women
 - 21% of minority men

According to GAO's "Guidelines for Performing Systemic Assessments" which was prepared by our EEO Office, the Equal Employment Opportunity Commission and DOL's Office of Federal Contract Compliance employ an 80% standard to determine if a particular policy or practice has an adverse effect on non-whites. For example, if the selection rate of non-white applicants is less than 80% of the selection rate of white applicants, the policies and practices of the promotion process are suspect and must be validated. Using this criterion, we cannot help but conclude that discrimination against non-whites is occurring somewhere in the competitive selection system.

If the minorities and women are to be encouraged to pursue a career with GAO, the Office must make a serious effort to make sure that the competitive promotion system does not adversely affect their opportunities. Now that many minorities and women, hired a few years ago at levels within the career ladder, have progressed to the GS-12 level, this needed fairness takes on added importance. *Recommendation: The Office should determine what the causes of the apparent discrimination might be and take steps to remove them.*

Minorities may not be as competitive because of such factors as less attractive assignments, lower levels of responsibility, poor performance appraisals, fewer



favorable comments on their appraisals by division directors, and inadequate representation by minorities on selection panels. We analyzed one of these factors—the composition of selection panels—and found that some of the bias may occur at this stage of the competitive selection system.

Composition of Selection Panels

No procedure assures that selection panels contain women and minorities; any representation is mostly by chance. Considering the relatively small number of women and minorities in the selection panel pool from which panels are built, we believe the chances of fair representation are small. This opinion is supported through an analysis of the panels.

Panels are built by the Competitive Selection Unit in the Office of Personnel. The panelists are picked from a screening panel pool of about 270 staff members appointed from nominees submitted primarily by division/office directors and regional managers. The pool consists of 33 minorities, 34 women (5 of whom are also black), and the rest white males.

In selecting a five-person screening panel, Personnel follows a set of specific guidelines. One of the rules is that, whenever possible, women and minorities be included on the panels, but there are no procedures to assure this rule is followed. In fact, the Competitive Selection Unit has no list or other means of readily identifying minorities or women, except by name. Without knowing the panelists' race or sex, there is no way a concerted effort can be made to place women and minorities on screening panels.

Between April 1977 and April 1978, 88 panels were convened to consider 155 announcements for GS-13, 14, and 15 positions and a few GS-11 and -12 positions for the International Division. A total of 265 people served on the panels, including 28 minority and 29 women representatives. (Five women were also minority.) Based on information maintained by the Competitive Selection Unit, the following table shows how often women and minorities sat on panels that reviewed Job Opportunity Announcements (JOA's):

GS Level	Total JOA's	Women		Minorities	
		Number	Percent	Number	Percent
15	24	0	0	6	25
14	31	6	19	11	35
13	88	55	63	33	38
11/12	12	9	75	6	50
TOTAL	155	70	45	56	36

The table shows that women and minorities are not represented very well on screening panels, with the least representation at the higher grades. Panels contained women 45% of the time and minorities 35% of the time. They contained women 75% of the time for GS-11 and 12 JOA's but there were no women on GS-15 screening panels. Minority representation ranged from a high of 50% of the GS-11 and 12 JOA's to a low of 25% for GS-15 JOA's.

Minorities and women were represented on less than half the screening panels convened between April 1977 and April 1978, and the percentage of panels on which they were represented grew progressively worse as the grade under consideration increased. Panel members must have at least the equivalent grade of the opening being competed for; so with fewer highly graded minorities and women to choose from, Personnel has had trouble meeting their guidelines. According to our analysis, if all highly graded minorities and women would serve on only one or two panels per year, this would be sufficient to assure their representation. *Recommendation: The Office should institute a procedure to require that all minorities and women GS-13 and above be members of the screening panel pool, and that each screening panel has at least one woman or minority representative.*

Other Perceived Deficiencies in the Competitive Selection System

The most widespread criticism of the Competitive Selection System is that the preselection of candidates by division directors and associate directors continues to be a pervasive practice. In some cases, the job announcement is written specifically for designated individuals; in other cases, the division director's clear endorsement on the appraisal form sent to the selection panel is the means by which a designated individual is chosen. The great majority of GS-13 selections and most GS-14 and 15 selections are perceived by employees to have been preselected. The likelihood of preselection was one of the reasons cited by a number of minorities who were eligible to apply for promotion in GAO but did not do so.

We doubt whether this problem can ever be fully overcome. Division directors should be able to indicate their preferences by favorable comments on the candidate appraisal forms. Unfortunately, one of the apparent inequities in the system so far has been the varying practices of division directors; some have made their preferences indisputably clear on their forms, while a few others have understood that they should refrain from trying to influence the selection panels. The result has been that selection panels cannot always effectively compare appraisal forms from candidates of different divisions. *Recommendation: A uniform policy needs to be established on the desirability and nature of these endorsements.*

Another perception is that upper-level hires are at a disadvantage in the Competitive Selection System, because they have not risen through the ranks as most panelists and selecting officials have. A number of these upper-level hires are minorities and women brought in from other organizations, often for specialist positions. These persons are hired, presumably, because their experience in previous jobs was considered valuable to GAO. Yet many of these upper-level hires feel that their previous experience is discounted by the selection panels. *Recommendation: The Office of Personnel should affirm the value to panelists of outside job experience, particularly when related to substantive job areas covered by GAO.*

Finally, fewer promotion opportunities exist now than in the past. The new Competitive Selection System moves a select few ahead quickly, but many good,

productive employees will have to wait longer for promotions. Many people perceive that extended time-in-grade could actually work against them when panels review their applications. The Office has a stake in keeping good, productive employees and not discouraging them to the extent that their morale will fall. *Recommendation: The Office of Personnel should stress to panels that extended time-in-grade should not be a negative statement on an applicant's promotability.*

Comptroller General's Reply

The EEOAC report dealt with several issues: the impact of CSP upon minorities, the composition of CSP panels, and other perceived deficiencies in the process.

1. Impact of CSP on minorities

At the meeting with EEOAC, the EEO Office provided statistics showing the results of competitive selection through July 7, 1978. These figures included two selection rounds beyond those used by EEOAC in assessing the system's impact upon minorities and women.

The most recent statistics show that *white women* have the highest rate of making certificates and of being selected. The figures are 50 percent and 55 percent, respectively. They compare with 41 percent and 34 percent for white men; 27 percent and 27 percent for minority men; and 37 percent and 20 percent for minority women.

Applying the 80 percent criterion (4/5 rule) for determining adverse impact, there is no adverse impact on white men in making certificates but they are adversely impacted in selections ($55\% \times .80 = 44\%$) by 10 percent. Minority men are down from the benchmark group (white women) by 13 percent (certificates) and 17 percent (selections), while minority women are down by 3 percent and 24 percent, respectively.

All of these percentages, however, need the perspective of actual numbers of persons involved. As the "Federal Uniform Guidelines on Employee Selection Procedures" notes:

"... differences in selection rate may not constitute adverse impact where differences are based on small numbers and are not statistically significant ... Where the evidence concerning the impact of a selection procedure indicates adverse impact but is based upon numbers which are too small to be reliable, evidence concerning the impact over a longer period of time ... may be considered in determining adverse impact."

Of 2,459 GAO employees who presented applications to the Competitive

Selection Unit, 2,217 or 90.2 percent were white men. White women were 4.8 percent, minority men 3.9 percent, and minority women 1.1 percent. We consider the numbers for these three groups to be too small to be reliable—both in terms of using white women to establish the “highest rate” benchmark (with a corresponding adverse impact on white men) as well as in concluding that the system is discriminating against minority persons.

It is perhaps worth noting, too, that 14 minority men and women made certificates over the first five selection rounds, with only one person being selected, whereas over the last four rounds 22 were certified and 8 selected. Attention should also focus on the fact that there were 60 minority applicants over the first five rounds, compared with 65 for the latter rounds. This difference is extremely small and doesn't explain the comparatively large increase in minority certificates and selections over the last four rounds.

In our view, it would be premature to conclude “that discrimination against non-whites is occurring somewhere in the competitive selection system.” A more prudent observation would be that data needs to be gathered and analyzed over a longer period of time, as the Federal Guidelines require. The EEO Office will perform this task and periodically provide statistical results to the Council.

On page 17, the report suggests that minorities may not be competitive because of such factors as less attractive assignments and lower levels of responsibility. A partial test of this issue is being performed in OMPS's analysis of data from the single agency series questionnaire. This study involved matching minorities and women in grades GS-11 through GS-14 to a white male on the basis of organizational unit, occupational series, grade, and time-in-grade. This procedure served to eliminate the possibility that differences in job responsibilities of minorities and women vis-a-vis white males were due to factors which would be expected to have an effect. The questionnaires provide a good data base since they were recent, produced for a non-EEO purpose, and were reviewed for accuracy and inclusiveness by supervisors.

In order to test for racial or sex differences, a group of classification specialists read the questionnaires and applied the proposed “Evaluator” standard to the jobs. They also went through and ranked the jobs independently from the standard. In addition, a group of GAO managers went through and ranked the whole job, also independent of the standard.

Preliminary results indicate *no differences* between minorities and their white male “twin,” nor between the females and their match. That is, when matched against white males, females and minorities perform equivalent duties in terms of knowledge required, supervision received, guidelines,

complexity, personal contacts, purpose of contacts, physical demands, and work environment. Neither was there a difference in the whole-job rankings made by the classifiers and GAO managers.

2. CSP panel composition

Personnel does attempt to convene panels containing minority representation. While the Competitive Selection Unit (CSU) does not have the minority designation of panelists, CSU attempts to have minorities on panels following the criteria set down by the Career Management Committee. The problem we face is the lack of minority employees at the grade levels required by the guidelines.

As it is now, females and minorities are already relatively over-represented on the panels. As shown in Table 1, while minorities and females respectively comprise 3.5% and 4% of those in grades 13 and above (eligible to serve on panels), they comprise 12.2% and 10.7% respectively of the total panel pool. This means that 47.1% of the eligible minorities are in the panel pool and 36.2% of the eligible females, compared to only 11% of the eligible white males.

Table 1

Analysis of CSP Panel Composition

	Minorities	White Women	White Males	Total
Number of persons GS-13 or above	70	80	1794	1944
Percent of total staff GS-13 or above	3.5%	4.0%	92.5%	100.0%
Number in CSP panel pool	33	29	208	270
Percent of total pool	12.2%	10.7%	77.1%	100.0%
CSP pool numbers as a percent of total subgroup	47.1%	36.2%	11.0%	13.8%

Over and above the issue of representation there is no reason to expect that more minorities on panels would result in more minorities on certificates. To suggest that this would be the case, implies that minorities and women would rate experience, appraisals, and the other factors differently than the white males. The possibility of cultural differences in screening panel evaluations is amenable to testing. Personnel will examine the data from CSP panel records and report on their findings.

While we do not agree with having panels composed of employees based solely on their race or sex regardless of grade or job knowledge, as suggested

by the report, we plan to make special efforts to communicate with all available minority and female staff who meet the guidelines, and encourage them to volunteer to join the pool of available panelists for occasional duty. To better acquaint members of the EEOAC with the competitive selection process, we would be willing to work with the Council in arranging for a limited number of Council members, of your choice, to actually participate in the October or November cycle.

3. Other perceived deficiencies

Charges of job announcements tailored to individuals and preselection must be made specific before we can respond. However, we will review the policy on the desirability and nature of division directors' endorsements on appraisal forms.

Every panel is instructed on the value of non-GAO experience and the parity of upper-level hire experience versus GAO experience. Therefore, we believe we are in conformity with the spirit of this recommendation.

As a general rule, lack of recent progression is a valid factor to consider in evaluating candidates for promotion. We do not agree with the recommendation to disregard evidence of lack of progression, as represented by extended time-in-grade or, in the private sector, lack of increase in responsibilities, although an explanation of any mitigating circumstances should be considered.

Advisory Council's Conclusion

The Office of Internal Review agreed with us in its August 1978 report on the Competitive Selection Process, concluding that the system was not accomplishing its equal employment opportunity objectives. The most recent figures on promotions (see Appendix III) indicate that little has changed. Minority men and especially minority women continue to fare poorly compared to white men and women. As of January 1979, 50 percent of white women and 40 percent of white men applicants made certificates, compared to 22 percent of minority women and 32 percent of minority men. Also, 49 percent of white women and 30 percent of white men were selected from the certificates, versus 21 percent of minority women and 26 percent of minority men.

GAO's top management argues that "data needs to be gathered and analyzed over a longer period of time," since the number of minorities applying is too few. Given the over two years' experience, we cannot be particularly optimistic.

GAO Should Develop an EEO Program Evaluation Model

Advisory Council's Statement

In order to determine how GAO evaluates its own EEO posture, we reviewed all of OIR's reports on EEO-related issues, talked to the Director, EEO, about the EEO Office's data-gathering activities, and met with staff from OMPS. We are pleased with the commitment GAO is demonstrating by the sheer number of studies being supported. We learned of at least 11 studies being performed primarily by OMPS, but also by HRD, FPCD, and LARO. The EEO Office also is working on several data-gathering and monitoring projects. However, we are concerned about the fragmented nature of GAO's evaluation efforts, the continuing lack of a planning and evaluation model in GAO, and the fact that invaluable in-house expertise in EEO matters is not being tapped.

Many of the studies underway are excellent. We particularly support the OMPS/PSAD Task Analysis of Auditor and Support Positions, the EEO Office's regional and divisional Systemic Assessments, and the joint OMPS-EEO Office experiment with the Civilian Personnel Accounting System.

On the whole, however, GAO's evaluation efforts lack cohesion and direction. OMPS and the EEO Office are responsible for the majority of studies now underway. Although the two have begun to share information about their respective projects more routinely than in the past, they have not planned their efforts jointly with common objectives in mind. Consequently, the studies they have sponsored for the most part neither relate to each other nor to any set of established goals. They lack a meaningful framework in which to be judged.

There is also no assurance that the various studies GAO is undertaking address the most serious EEO problems. Although the EEO Office routinely performs some analyses of GAO's EEO posture, the effort is not comprehensive. One aspect that has been neglected is salary differentiation. For the first time this year, a study was undertaken in OMPS which reviewed changes in the relative payroll status of GAO general employees over the past 5½ years. Results show that the salary gaps between both white vs. minority and male vs. female employees in GAO have been widening rather than narrowing.

During the period June 30, 1976, through December 31, 1977, the gap between average white and minority salary levels widened by almost \$1,200, or by over 16 percent. The white rate of salary increase was twice that of minorities (8.4% vs. 4.2%). During the same period, the gap between average male and female earnings grew by over \$1,500, or by over 15 percent. The male rate of salary increase was more rapid than that of females (9.6% vs. 5.1%). For the entire 5½ year period, minorities experienced gains. However, the downward trend in the last 18 months caused a 42.1 percent loss in that gain. During the last 5½ years

females experienced losses so that the most recent trend only exacerbated an already poor situation.

We commend OMPS for its plans to undertake a more detailed followup study in light of these findings. We believe, however, that the study results also indicate the need for a comprehensive planning and evaluation model that will provide GAO with a picture of its changing profile on an on-going basis. Neither OMPS nor the EEO Office has begun to systematically develop such a model.¹

Ideally, the model should be capable of (1) generating "indicators" such as minority/female distribution in the workforce by grade, job series, etc., salary differentiation among various groups, or comparative rates of movement among groups, (2) determining annual rates of change, and (3) predicting GAO's future EEO posture given current conditions. It should, furthermore, produce information by age and handicap as well as race and sex, and by headquarters and regional offices.

The Council recognizes that other agencies also have not developed an EEO model. However, GAO is particularly fortunate because the expertise to begin is available in-house. The auditors in FPCD and HRD's Civil Rights Group (CRG) perform what are in many instances very complex analyses of executive agency EEO programs. A good example is FPCD's audit of Department of Justice EEO programs. Also, there is staff in HRD/CRG doing extensive work with various types of EEO models. Despite their technical expertise, however, these auditors have not been called upon to apply their knowledge and skills to GAO's EEO situation.

Conclusions

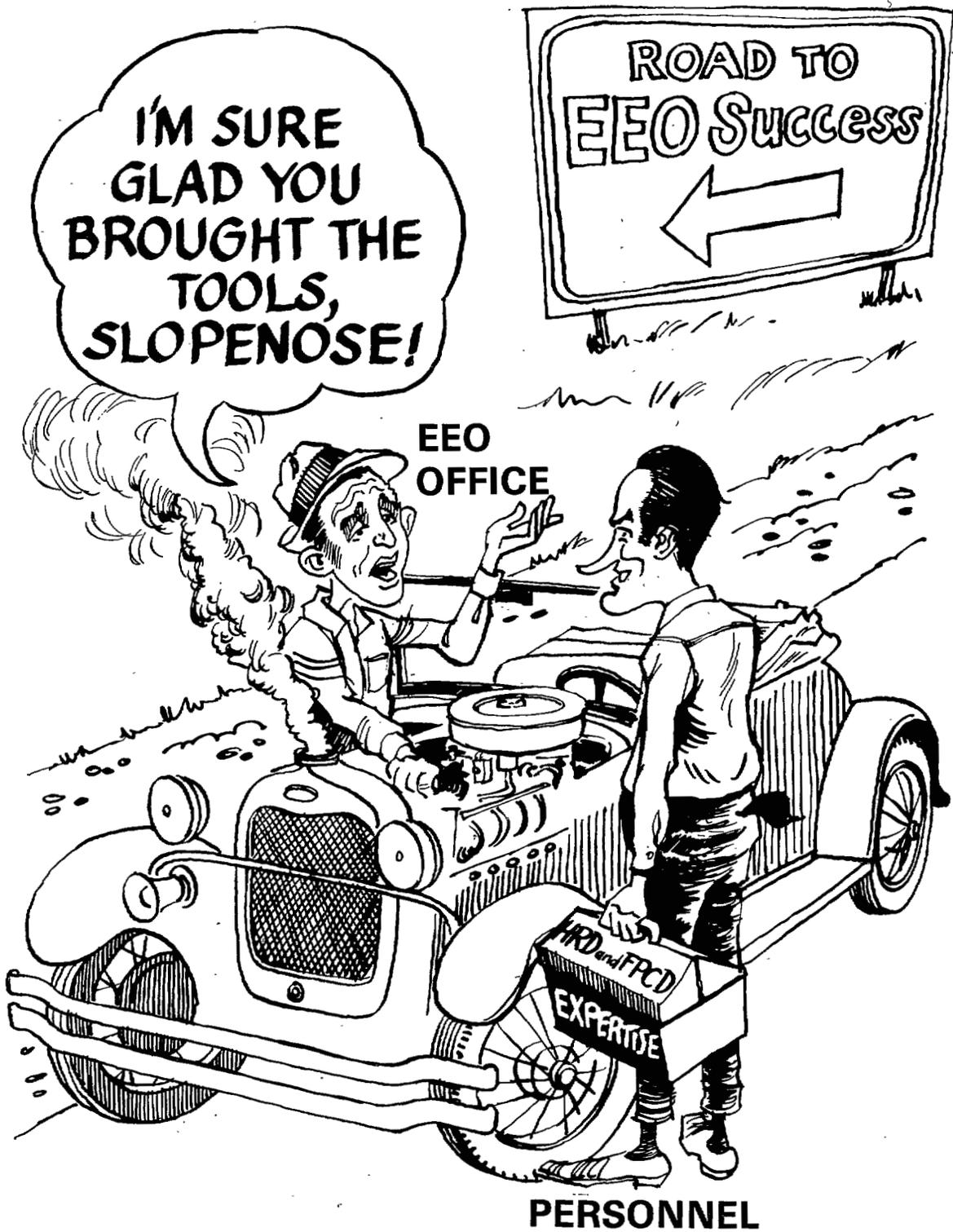
In summary, the Council is concerned that GAO is evaluating its EEO program management and effectiveness somewhat haphazardly and fears the result will be isolated studies that have little meaning by themselves, or, worse still, that do not really get to the heart of many EEO problems GAO may have. The Council is also dismayed by the amount of in-house EEO expertise that has yet to be used for GAO's benefit.

Recommendations:

The Council recommends the establishment of a comprehensive, systematic EEO evaluation program that would enable GAO to foresee situations like the one described in the salary differentiation study and design studies in a meaningful framework to identify the basic causes. This program would, in turn, permit GAO to take action before these situations become major problems.

We recommend that a permanent task force be established to develop the EEO evaluation program and that it be composed not only of OMPS and EEO Office staff, but also of advisory council representatives, and most especially,

¹The Council notes that GAO's current data system may not be adequate for developing a model and supports efforts to experiment with other data systems. However, the Council also believes that better analysis can be done on data that is already available and that even without proper data, it is not too soon to begin studying other models and determining what kinds of data would be required for a GAO model.



HRD and FPCD staff with expertise in auditing affirmative action programs.

We further recommend that GAO's Affirmative Action Plan for FY 1979 be revised to include action steps for forming the task force and developing a comprehensive EEO evaluation program.

Comptroller General's Reply

We agree generally with the Council's view that EEO program evaluation needs sharper focus, improved planning and coordination, and support from more line personnel with expertise in the subject.

Toward this end, and as the Council requested, the 1979 Affirmative Action Plan will include provisions for establishing an intra-agency work group to begin developing a comprehensive EEO evaluation program. Initial members of the group will include the EEO Director, Director of Personnel, OMPS Director, the assistant directors in HRD and FPCD who are responsible for EEO/civil rights audits, and the chairpersons of EEOAC, HAC, and WAC. Because of the need to select a new EEO Director, the target date for a first meeting of this group will be November 15, 1978.

The report devotes considerable space to citing the *preliminary* results of a study dealing with salary differentials. There were many methodological flaws in the original study. Therefore, the question is not whether such a salary gap exists and whether or not it is increasing, but rather whether that phenomenon is a useful measure of GAO's EEO efforts.

After further study, we have concluded that salary differentials are neither a valid nor reliable measure of our success in the EEO area. There are a number of reasons for this.

1. The concept of salary differentiation has been used to identify bias and discriminatory practices in the total U.S. labor force. In the private sector, many employers, through "merit" clauses in contracts and other means, can provide different salaries to different workers for the same work in the same jobs. This practice is very difficult in the Federal Government, however, because pay rates for various jobs are standardized by the Civil Service Commission. The law has also established minimum time-in-grade requirements, and promotions must be made on the basis of merit. Since GAO cannot do very much about salary differentials, it is inappropriate to apply this technique to GAO on such an aggregate basis.

2. The use of average salary differentials is misleading in another way. Average salaries in the study were calculated using the pay rates in effect at the beginning and the end of the subject 18-month period. During that time, Federal employees were granted two separate cost-of-living increases: an

average 4.83% increase in October 1976, and an across-the-board 7.05% increase in October 1977. These two represent a compounded increase averaging 12.2%. Because of differences in base salaries, the application of an across-the-board pay raise will provide more total dollar increase to higher graded employees. Also, the October 1977 increase was progressive, that is, successively higher grades received progressively larger percentage pay increases to provide comparability with private industry. Since, despite the gains we have made, women and minorities predominate in the lower grades and white males predominate in the higher grades, the net effect is an increase in the gap between average salaries.

A major problem with the salary gap approach is that it obscures the gains which have been made and could lead to inappropriate attempts at remedial action.

Over the past 6 years, GAO has made steady progress in improving our EEO profile. In 1972, minority persons represented 5.1% of those in grades GS-9, 11, and 12. They now comprise 16.1% in those grades, which is more than a three-fold increase. In the higher grades there have also been considerable gains. While only 1.2% of the GS-13/15s in 1972 were minority persons, their representation is now 3.6%. Among the supergrades, the increase has been from 2.7% to 3.6%. Comparatively, there are now some sizeable numbers of females and minority persons moving through the career system and we expect that their progress will continue to improve our EEO profile.

The fact that these gains do not show up in the salary gap data is a quirk inherent in that methodology. That is, the salary gap results were greatly influenced by our hiring support personnel (a traditionally higher turnover group) at lower grades. This was done in order to comply with CSC standards. The applicable CSC registers for these types of positions were composed of primarily females and minority persons. We would hope that the EEOAC would not endorse selecting only non-minority persons for these jobs just to improve our posture on something as artificial as salary gaps. Also, if the persons selected for these jobs were hired at inflated grades, it would unfairly expose them to a greater risk of downgrading. Furthermore, if we were to push minorities and females through the various grade levels too rapidly, they may miss out on valuable experiences which would impact on their future performance and career progression.

Advisory Council's Conclusion

We are very pleased that the Office has agreed to our recommendations. The first meeting of the program evaluation working group, comprised of representatives from Personnel, OMPS, the EEO Office, FPCD and HRD Civil Rights audit staffs, and advisory councils, was held on March 1, 1979.

GAO can play an important leadership role here. With our evaluation expertise, we can perhaps develop a model system, which eventually all Federal agencies could use to monitor their progress toward equal opportunity.

After talking to the Civil Rights audit staff in FPCD, we realized the salary differentiation study we cited could have been improved had it adjusted for occupational series and regional/headquarters location. Still, we were surprised to learn that this evaluation approach can be "neither a valid nor reliable measure" of our future success or failure. We refer the reader to Chapter 3—"Salary Differentials"—in the Comptroller General's Report to the Congress, *The Department of Justice Should Improve Its Equal Employment Opportunity Programs* (FPCD-78-79; Feb. 23, 1979).

General Accounting Office
Analysis of GS Employees by Grade, Sex, and Racial Category as of May 20, 1978

GS Grade	Minority Women	Minority Men	White Women	White Men	Total Women	Total Men	Grand Total
1-4	222	50	205	51	427	101	528
% of total	42%	9.4%	38%	9.6%	80.8%	19.1%	
5	137	13	158	28	295	41	336
% of total	40.7%	3.8%	47%	8.3%	87.7%	12.2%	
6	110	5	130	4	240	9	249
% of total	44.1%	2%	52.2%	1.6%	96.3%	3.6%	
7	62	18	112	66	174	84	258
% of total	24%	6.9%	43.4%	25.5%	67.4%	32.5%	
8	1	8	26	1	27	9	36
% of total	2.7%	22.2%	72.2%	2.7%	75%	25%	
9	33	46	91	162	124	208	332
% of total	9.9%	13.8%	27.4%	48.7%	37.3%	62.6%	
10	1	0	2	2	3	2	5
% of total	20%	0%	40%	40%	60%	40%	
11	34	58	116	315	150	373	523
% of total	6.5%	11%	22.1%	60.2%	28.6%	71.3%	
12	45	107	128	868	173	975	1148
% of total	3.9%	9.3%	11.1%	75.6%	15%	84.9%	
13	8	31	50	804	58	835	893
% of total	.8%	3.4%	5.5%	90%	6.4%	93.5%	
14	3	20	23	598	26	618	644
% of total	.4%	3.1%	3.5%	92.8%	4%	95.9%	
15	0	5	6	308	6	313	319
% of total	0%	1.5%	1.8%	96.5%	1.8%	98.1%	
16-18	0	3	1	84	1	87	88
% of total	0%	3.4%	1.1%	95.4%	1.1%	98.8%	
Total	656	364	1048	3291	1704	3655	5359

Appendix II—Summary of Competitive Selection Process for December 17, 1976, Through April 4, 1978

Summary—Competitive Selection Process

	Applications Processed					Applications Certified				
	WW	WM	MW	MM	T	WW	WM	MW	MM	T
12/17/76	24	657	5	12	698	6	160	0	1	167
01/24/77	35	954	2	34	1025	10	234	1	1	246
03/15/77	13	412	5	4	434	5	113	0	2	120
06/30/77	33	532	10	19	594	21	175	1	5	202
09/21/77	17	485	12	25	539	5	142	2	2	152
12/06/77	9	286	3	13	311	6	87	0	1	93
04/04/78	58	1386	31	103	1578	10	318	7	10	345
Total	189	4712	68	210	5179	63	1229	11	22	1325

	Applicants					Applicants Certified				
	WW	WM	MW	MM	T	MW	WM	MW	MM	T
12/17/76	7	258	1	7	273	4	102	0	1	107
01/24/77	17	292	2	7	318	8	133	1	1	143
03/15/77	6	170	3	4	183	3	70	0	2	75
06/30/77	19	267	3	13	302	12	140	1	5	158
09/21/77	12	334	5	15	366	6	112	1	2	121
12/06/77	5	159	2	6	172	2	68	0	1	71
04/04/78	21	423	5	24	473	8	180	2	7	197
Total	87	1903	21	76	2087	43	805	5	19	872

	Applicants Selected				
	WW	WM	MW	MM	T
12/17/76	4	35	0	1	40
01/24/77	5	53	0	0	58
03/15/77	1	26	0	0	27
06/30/77	6	44	0	0	50
09/21/77	3	32	0	0	35
12/16/77	2	19	0	0	21
04/04/78	3	66	0	3	72
Total	24	275	0	4	303

Codes

WW = white women
 WM = white men
 MW = minority women
 MM = minority men
 T = total

Notes: Schedule represents persons applying for GS-13 to GS-15 positions only.
 Applications Certified exceeds Applicants Certified because some applicants make more than one certificate.

Appendix III—Summary of Competitive Selection Process for December 17, 1976, Through January 8, 1979

Summary—Competitive Selection Process

	Applications Processed					Applications Certified				
	WW	WM	MW	MM	T	WW	WM	MW	MM	T
12/17/76	24	657	5	12	698	6	160	0	1	167
01/24/77	35	954	2	34	1025	10	234	1	1	246
03/15/77	13	412	5	4	434	5	113	0	2	120
06/30/77	33	532	10	19	594	21	175	1	5	202
09/21/77	17	485	12	25	539	5	142	2	2	152
12/06/77	9	286	3	13	311	6	87	0	1	93
04/04/78	58	1386	31	103	1578	10	318	7	10	345
05/02/78	13	342	6	18	379	3	93	0	4	100
05/31/78	39	425	25	23	512	10	72	3	9	94
07/07/78	49	463	19	43	574	15	94	7	8	124
07/31/78	20	292	9	16	337	7	67	1	6	81
08/28/78	17	367	1	22	407	10	73	0	5	88
10/02/78	40	588	21	30	679	11	114	0	9	134
11/06/78	16	474	16	24	530	5	104	0	3	112
12/06/78	29	504	19	27	579	6	122	1	5	134
01/08/79	17	472	12	36	537	6	116	1	6	129
Total	429	8639	196	449	9713	136	2084	24	77	2321

	Persons					Persons Certified				
	WW	WM	MW	MM	T	WW	WM	MW	MM	T
12/17/76	7	258	1	7	273	4	102	0	1	107
01/24/77	17	292	2	7	318	8	133	1	1	143
03/15/77	6	170	3	4	183	3	70	0	2	75
06/30/77	19	267	3	13	302	12	140	1	5	158
09/21/77	12	334	5	15	366	6	112	1	2	121
12/06/77	5	159	2	6	172	2	68	0	1	71
04/04/78	21	423	5	24	473	8	180	2	7	197
05/02/78	7	179	3	9	198	3	74	0	4	81
05/31/78	12	132	4	7	155	5	44	2	3	54
07/07/78	18	182	4	13	217	10	67	3	4	84
07/31/78	5	115	2	10	132	5	69	1	5	80
08/28/78	5	158	1	9	173	3	55	0	4	62
10/02/78	16	216	7	13	252	9	83	0	5	97
11/06/78	13	240	4	10	267	5	75	0	3	83
12/06/78	15	264	7	13	299	7	89	1	5	102
01/08/79	9	253	6	23	291	4	87	1	6	98
Total	187	3642	59	183	4071	94	1448	13	58	1613

	Persons Selected				
	WW	WM	MW	MM	T
12/17/76	4	35	0	1	40
01/24/77	5	53	0	0	58
03/15/77	1	26	0	0	27
06/30/77	6	44	0	0	50
09/21/77	3	32	0	0	35
12/16/77	2	19	0	0	21
04/04/78	3	66	0	3	72
05/02/78	0	21	0	1	22
05/31/78	2	16	0	2	20
07/07/78	6	18	2	1	27
07/31/78	2	14	0	1	17
08/28/78	0	15	0	0	15
10/02/78	5	17	0	3	25
11/06/78	2	24	0	0	26
12/06/78	3	21	1	1	26
01/08/79	2	22	0	2	26
Total	46	443	3	15	507

Codes

- WW = white women
- WM = white men
- MW = minority women
- MM = minority men
- T = total

Note: Schedule represents only GAO employees applying for GS-13 to GS-15 positions.

Percentages—Competitive Selection Process

	Average Applications Processed Per Person				Percentage of Applications Certified			
	WW	WM	MW	MM	WW	WM	MW	MM
12/17/76	3.4	2.5	5.0	1.7	25.0	24.4	0.0	8.3
01/24/77	2.1	3.3	1.0	4.9	28.6	24.5	50.0	2.9
03/15/77	2.2	2.4	1.7	1.0	38.5	27.4	0.0	50.0
06/30/77	1.7	2.0	3.3	1.5	55.3	32.9	10.0	26.3
09/21/77	1.4	1.2	2.4	1.7	35.3	29.3	16.7	8.0
12/06/77	1.8	1.8	1.5	2.2	55.6	30.4	0.0	7.7
04/04/78	2.8	3.3	6.2	4.3	17.2	22.9	22.6	9.7
05/02/78	1.9	1.9	2.0	2.0	23.1	27.2	0.0	22.2
05/31/78	3.3	3.2	6.3	3.3	25.6	16.9	12.0	39.1
07/07/78	2.7	2.5	4.6	3.3	30.6	20.3	36.8	18.6
07/31/78	4.0	2.5	4.5	1.6	35.0	22.9	11.1	37.5
08/28/78	3.4	2.3	1.0	2.4	58.8	19.9	0.0	22.7
10/02/78	2.5	2.7	3.0	2.3	27.5	19.4	0.0	30.0
11/06/78	1.2	2.0	4.0	2.4	31.3	21.9	0.0	12.5
12/06/78	1.9	1.9	2.7	2.1	20.7	24.2	5.2	18.5
01/08/79	1.9	1.9	2.0	1.6	35.3	24.6	8.3	16.7
Total	2.3	2.4	3.3	2.5	31.7	24.1	12.2	17.1

	Percent of Persons Certified				Percent of Certified Persons Selected			
	WW	WM	MW	MM	WW	WM	MW	MM
12/17/76	57.1	39.5	0.0	14.3	100.0	34.3	0.0	100.0
01/24/77	47.1	45.5	50.0	14.3	62.5	40.1	0.0	0.0
03/15/77	50.0	41.2	0.0	50.3	33.3	37.1	0.0	0.0
06/30/77	63.2	52.4	33.3	38.5	50.0	31.4	0.0	0.0
09/21/77	50.0	33.5	20.0	13.3	50.0	28.6	0.0	0.0
12/06/77	40.0	42.8	0.0	16.7	100.0	27.9	0.0	0.0
04/04/78	38.1	42.6	40.0	29.2	37.5	36.7	0.0	42.9
05/02/78	42.9	42.5	0.0	44.4	0.0	28.4	0.0	25.0
05/31/78	41.7	33.3	50.0	42.9	40.0	36.4	0.0	66.7
07/07/78	55.6	36.8	75.0	30.8	60.0	26.9	66.7	25.0
07/31/78	100.0	60.0	50.0	50.0	40.0	20.3	0.0	20.0
08/28/78	60.0	34.8	0.0	44.4	0.0	27.3	0.0	0.0
10/02/78	56.3	38.4	0.0	38.5	55.6	20.5	0.0	60.0
11/06/78	38.5	31.3	0.0	30.0	40.0	32.0	0.0	0.0
12/06/78	46.7	33.7	14.3	38.5	42.9	23.6	100.0	20.0
01/08/79	44.4	34.4	16.7	26.1	50.0	24.7	0.0	33.3
Total	50.3	39.8	22.0	31.7	48.9	30.6	21.4	25.9

Codes

WW = white women
 WM = white men
 MW = minority women
 MM = minority men

Note: Schedule represents only GAO employees applying for GS-13 to GS-15 positions.

Note to our readers:

We hope you found this report informative and interesting. If you have any questions about it, please contact your EEO Advisory Council representative. Should you have any ideas on how hiring, career development, training, promotions, and other personnel policies and practices can better contribute to equal opportunity, please let us know. The Council will help you make your views known to top management.

Your EEO Advisory Council

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