



Highlights of [GAO-12-135](#), a report to congressional requesters

Why GAO Did This Study

In the past, allegations of management weakness and inadequate provision of civil rights services were made against the U.S. Coast Guard's (USCG) Civil Rights Directorate (CRD). To address these allegations, in 2008, the Director of CRD commissioned an external review of CRD's operations. As a result of recommendations made in that review, CRD has developed steps, such as reorganizing its operations, with the intent of program improvement. As requested, GAO examined (1) how the USCG's equal employment opportunity (EEO) program compares to the Equal Employment Opportunity Commission's (EEOC) Management Directive 715 (MD-715) reporting standards for a model program, and (2) the extent to which CRD has defined performance goals and measures that are useful in assessing program improvements. To conduct this work, GAO reviewed documentation from the USCG and EEOC, and literature on performance measurement. GAO also interviewed USCG, EEOC and other relevant agency officials.

What GAO Recommends

GAO recommends that the USCG (1) take a systematic approach in conducting barrier analyses and reporting its progress toward becoming a model EEO program and (2) refine its performance measurement plan to address gaps in key areas. DHS concurred with both GAO recommendations.

View [GAO-12-135](#). For more information, contact Yvonne D. Jones at (202) 512-6806 or jonesy@gao.gov.

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COAST GUARD

Continued Improvements Needed to Address Potential Barriers to Equal Employment Opportunity

What GAO Found

The USCG is making progress toward becoming a model equal employment opportunity (EEO) program, as defined by EEOC. In fiscal year 2008, the USCG established a cross-functional task force, including many divisions of Coast Guard and co-led by the Civil Rights Director and the Assistant Commandant for Human Resources, to identify EEO problems, review data, as well as develop and implement plans to address barriers to EEO. EEOC officials commended the USCG's cross-functional approach, noting that it could strengthen the USCG's ability to bring together different divisions of the USCG toward a common goal of identifying and eliminating barriers to EEO. According to EEOC, progress has been most noticeable with the commitment of USCG's leadership to equality for all employees and applicants and its focus on resolving complaints in a quick and cost effective manner. However, EEOC noted that USCG could improve the way it conducts analyses of its barriers to equal employment. To attract and retain top talent, EEOC's MD-715 states that federal agencies are to identify barriers to EEO in the workplace, execute plans to eliminate barriers, and report annually to EEOC. USCG has several initiatives to improve how it identifies and addresses possible barriers. Still, based on its MD-715 reporting, there is no evidence that the USCG is taking a structured and consistent, or systematic approach to identifying and eliminating barriers in the workplace. For example, USCG has not documented any assumptions or reasoning to support the rationale for its improvement initiatives, and it is not apparent that the initiatives are part of a larger strategy. By clearly demonstrating its efforts to identify and eliminate barriers, the USCG could improve its program, and the ability of EEOC and others to assess USCG's progress towards becoming a model EEO program.

In response to a prior GAO recommendation, CRD developed a performance measurement plan in July 2011 to help it assess the actions it has taken to improve its provision of EEO services, including counseling and training, to USCG personnel. The plan incorporated some common practices of performance plans, such as establishing annual goals, objectives, quantifiable measures, and targets that could help CRD maintain accountability for the changes it has made to improve services. However, there are weaknesses in key areas of CRD's performance plan, such as measures that do not consistently provide a valid representation of the performance goals. Additionally, while nearly all CRD's measures have targets, CRD has not included baselines against which to compare goals and future performance. Further, CRD's plan does not include credible procedures to verify and validate performance information. Refining its performance measurement plan would help address these gaps and provide reasonable assurance that CRD is achieving its intended objectives for program improvements.