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What Is The EEO Advisory Council?



The General Accounting Office's Equal Employment Advisory Council (EEOAC) has 19 members, including

- o 15 division and office representatives,
- o a National Federation of Federal Employees, GAO Lodge No. 1822, representative,
- o an advisor for handicapped employees,
- o a liaison from the Field Operations Division, and
- o the Chair, who is an at-large member.

On September 23, 1971, the Comptroller General established the Council to bridge the communication gap between management and employees. The purpose of the Council has been to

- o provide a medium for employees to participate with management in EEO matters;
- o improve communication by providing a channel for employee attitudes, aspirations, and problems in EEO matters to surface and be made known to management;
- o comment on proposed changes to Office-wide policies and practices which affect the treatment of GAO employees;
- o make recommendations to the Comptroller General and top level management on office policies, practices, and procedures as they affect equal employment opportunity;
- o help develop EEO action plans by providing substantive and precise recom-

recommendations for plan content, with an opportunity for comment on final proposals before submitting them to the Comptroller General.

The Council reviews a wide range of personnel issues affecting GAO employees. The 1980-1981 Council accomplished the following:

- o We reviewed at least 50 new personnel regulations and orders, providing comments on such regulations as discrimination complaint procedures, equal employment opportunity, special emphasis advisory groups, upward mobility, and table of disciplinary offenses and penalties.
- o We worked with the new Personnel Appeals Board.
- o We monitored Appeals Board member selections.
- o We had our recommendations accepted on the new Appeals Board Selection Process.
- o We participated in revision of the competitive selection process.
- o We commented on adjustments to the project teams approach.

In addition to the above activities, the Council met with the Comptroller General on October 29, 1980. The annual meeting has provided the Council with a forum to raise the most important EEO issues facing GAO employees. The remainder of this report details our presentation to Mr. Staats, his February 26, 1981, written response, and our assessment of where GAO stands as of May 1981.

We hope you will find this report informative and interesting. If you have any questions about it, please contact your EEO (now Civil Rights) Advisory Council representative. Should you have any ideas on how hiring,

career development, training, performance appraisals, promotions, discrimination complaints, and other personnel policies and practices can better contribute to equal opportunity for all employees, please let us know. The Council will help you make your views known to top management.

Your EEO Advisory Council
Tyrone Mason, Chairman

Summary

Training Needs of Newly Hired Support Staff Should Be Identified and Satisfied

The Council found that 52 percent of the newly hired support staff (hired during fiscal year 1980) had never received an orientation course. Of those who had, 44 percent received it more than 1 month after joining GAO. With the exception of orientation, 59 percent of the newly hired support staff did not receive any internal training courses.

Personnel responded to our findings and revised its orientation program. It did not, however, advise us about its plan for making other internal training courses available to newly hired support staff.

The Council Is Concerned about the Future of the Upward Mobility Program

As of July 1980, CED and HRD each had four Upward Mobility positions. Other divisions and offices were making little or no commitment. PAD, EMD, GGD, ID, GS&C, OGC, and the Dallas, Los Angeles, and Seattle regional offices had no Upward Mobility positions. The Council recommended new leadership to strengthen the program and increase and broaden the number of opportunities.

Management did not agree. It considers SES managers' performance appraisal contracts adequate for holding divisions and offices accountable for supporting EEO programs such as Upward Mobility.

Competitive Selection System and the Progress of Minorities and Women

Minorities and women together have annually increased their percentage of total selections for GS-13/14/15 vacancies. In 1979-80, however, minority selections dropped slightly, while white women selections continued to gain.

Minorities and Women Are Still Underrepresented at GAO's Higher Grade Levels

The most progress made by minorities and women in becoming more represented in GAO has occurred in the GS-7 through GS-12 range. At the GS-13 and higher grade levels, progress has been limited.

Management responded to the statistics by stating, "Recognizing that GAO's entry-level affirmative recruitment program did not begin to produce significant results until 1974-75, we should not expect the full impact of this effort to register on our competitive grades until the 1982-87 period."

GAO Needs Better Affirmative Action Planning

The Council recommended three ways to improve GAO affirmative action planning:

- o Obtain more involvement by the EEOAC at the front end of plan development.
- o Cite more specifics in terms of actions to be taken.
- o Unify short- and long-term goals for reducing underrepresentation in the work force.

Management is taking various steps in the right direction to improve GAO's affirmative action planning. The Council will continue to monitor the development of unified goals and plans.

GAO Employees Are Not Receiving Performance and Career Development Counseling

The Council recommended that divisions and offices monitor the type and frequency of performance and career development counseling provided to their employees. Management responded that BARS will require supervisors to be rated on how well they perform appraisal responsibilities. Also, SES performance agreements require support of performance appraisal and Individual Development Plans.

The Council recommended for the second consecutive year that GAO develop explicit guidelines on staff rankings so that employees can find out what they have to do to improve their rankings and chances for promotion. Without such criteria, discriminatory practices are much more likely to occur. Management recently took a step in the right direction by amending the Competitive Selection Form 503 to document counseling of applicants. It still has not, however, developed the necessary criteria to guide this counseling.

GAO Should Continue the Practice of Inviting Minorities and Women To Serve as Comptroller General's Luncheon Speakers and Expert Panelists

The Council reviewed the lists of speakers and panelists and found that the Office has had good success in obtaining minorities and women. We encouraged management to continue this practice.

Training Needs of Newly Hired Support Staff Should Be Identified And Satisfied

ADVISORY COUNCIL'S STATEMENT

The support staff ^{1/} plays an important role in helping GAO accomplish its mission in a timely and efficient manner. Because of these important responsibilities, Personnel has developed a training program of internal courses for support staffers.

We applaud the concern and effort devoted to this program. However, in general, the Council found that the newly hired support staff has not been taking the courses.

To assist the Council's analysis of support staff training needs, Personnel provided a computerized listing of support staff hired during fiscal year 1980. Of the 177 individuals who appeared on the listing, the Council was able to contact 127 of them. The Council found that 52 percent of the newly hired support staff interviewed had never received an orientation. Furthermore, of those who had orientation, 44 percent received it more than 1 month after joining GAO. Newly hired support staff were unable to provide the Council with reasons why they had not received an orientation.

The Council also found that with the exception of orientation, 59 percent of the newly hired support staff did not receive any internal support staff training. Many support staffers did not know why they had never received these courses. Other newly hired support staff gave various reasons why they had not received training. These include:

1. Many support staffers did not know why they had never received these courses.
2. Part-time and temporary support staff felt they were ineligible for internal training.

3. Some support staff were unaware of the training courses being offered.
4. Some support staff felt that their workload prevented them from attending training courses.
5. Some support staff informed the Council that their supervisors felt they did not need training.

The Council believes that it is important to identify and satisfy support staff training needs. Therefore, the Council recommends that division/office resource managers (1) assess the training and developmental needs of their newly hired support staff and (2) schedule them in the appropriate internal training courses.

COMPTROLLER GENERAL'S REPLY

The EEO Advisory Council identified two deficiencies in the training of newly hired support staff:

1. Most either did not receive an orientation or received it over a month after reporting for duty.
2. More than half received no other internal support staff training.

The more critical of these needs is the lack of a timely orientation since this increases the time necessary for new support staff to begin working effectively.

All of GAO's orientation programs are being revised so that new employees receive orientation during their first 2 days on the job. This change has already been made for professional employees beginning in October 1980. The support staff orientation is now being revised and tested and is expected to be offered

on the first Monday and Tuesday of each pay period beginning in late February, 1981.

ADVISORY COUNCIL'S CONCLUSION

The Council supports the revised orientation program offered to newly hired support staff by the Training Branch of the Office of Organization and Human Development. We believe that the program will enhance the effectiveness of new employees.

Regarding our recommendation that division/office resource managers identify and satisfy newly hired support staff training needs, the Comptroller General provided us with a draft letter outlining the Office's plans on this matter. The Training Branch advised us, however, that the letter was never formally sent to the Council because of erroneous information on the orientation program for newly hired support staff. A corrected letter has never been sent to the Council for comment.

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The Council Is Concerned About The Future Of The Upward Mobility Program

ADVISORY COUNCIL'S STATEMENT

Reviewing the status of Upward Mobility, the Council found that most headquarters divisions and major offices were making little or no commitment to the program. Of the 31 persons currently in Upward Mobility, only 15 are in headquarters. Eight of those 15 are equally divided among CED and HRD, the headquarters units most committed to offering opportunities. The remaining seven persons are in LCD, PSAD, FPCD, FGMS, and Personnel. Four operating divisions, GS&C, and General Counsel have no Upward Mobility participants. The breakdown by division, office and region follows:

Under the current decentralized approach, Personnel cannot remedy the lack of opportunity in many organizational units because the divisions and offices are responsible for the Upward Mobility Program. The Council believes the program can only be strengthened by centralizing responsibility for managing and promoting it. Therefore, the Council recommends that the Office centralize in Personnel responsibility for managing the Upward Mobility Program.

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UPWARD MOBILITY PARTICIPANTS (July 1980)

<u>Division/Office</u>	<u>No. of Current Participants</u>	<u>Regional Office</u>	<u>No. of Current Participants</u>
CED	4	Detroit	2
HRD	4	Washington	2
LCD	2	Boston	2
PSAD	2	Chicago	2
Personnel	1	Atlanta	1
FPCD	1	Cincinnati	1
FGMSD	1	Denver	1
PAD	0	Kansas City	1
EMD	0	New York	1
GGD	0	Norfolk	1
ID	0	Philadelphia	1
GS&C	0	San Francisco	1
OGC	0	Dallas	0
		Los Angeles	0
		Seattle	0

Source: Civil Rights Office

COMPTROLLER GENERAL'S REPLY

It is our view that for the most effective use of staff resources, managers should be both accountable and responsible for proper utilization of their resources. For this reason we believe the Upward Mobility Program, as well as other staff development programs, should continue as a responsibility exercised by the divisions and offices. Under the Civil Service Reform Act's provision establishing a Senior Executive Service, managers at GAO, like other agencies, are required to meet individual performance standards. Accordingly, GAO's managers have individual performance appraisal agreements setting forth objectives which must be substantially met--Equal Opportunity/Affirmative Action being one of the major objectives. Hence, it is important that managers have the flexibility in their operations so that they can effectively, efficiently, and economically meet all the objectives with which they are charged. Having a decentralized approach to the Upward Mobility Program will in no way detract from our commitment to meet our agency's Affirmative Action goals. Although the divisions, offices, and regions will be responsible for managing the Upward Mobility Program for their specific areas,

Personnel has assigned responsibility to the Staffing Policy and Recruitment Branch to monitor program results to assure that we are conforming with the intent of the program.

ADVISORY COUNCIL'S CONCLUSION

Even though SES managers can be held accountable for Upward Mobility through their performance appraisal contracts, the Council still believes that new leadership is needed to support the Upward Mobility Program. As a practical matter, the Council questions the effectiveness of such SES contracts in supporting human development goals. We doubt that division and office managers in PAD, EMD, GGD, ID, GS&C, and OGC and the Dallas, Los Angeles, and Seattle regions had to explain to anyone why their organizations had no Upward Mobility participants.

Competitive Selection System And The Progress Of Minorities And Women

ADVISORY COUNCIL'S STATEMENT

How Minorities and Women Have Fared Under Competitive Selection

The Council examined 4 years of competitive selection system results. We found that minorities and women together have annually increased their percentage of total selections for GS-13/14/15 vacancies. (See Table 1.) However, the increase from 1979 to 1980 is solely attributable to gains made by white women. There has actually been a slight drop in the percentage selections of minority women and minority men. (See Table 2.)

Effectiveness of the 50-Percent Selection Goal

The Comptroller General's April 1, 1980, memorandum--Restrictions on Hiring for FY 1980--established a 50-percent selection goal for minorities and women for GS-13 through GS-15 vacancies. Recent selection statistics (April 18 through September 30) show that 29 percent of total selections were minorities and women. (See Table 3.) This is 7.6 percentage points higher than the 1979 figure of 21.4 percent cited in Table 1. Most of the increase is probably attributable to the 50-percent selection goal.

TABLE 1

<u>Year</u>	<u>Minorities and Women as Percentage of Total Selections (GS-13/14/15)</u>
1977	8.9
1978	15.2
1979	21.4
1980 (through 8-31-80)	22.4

Source: Data supplied by Personnel.

TABLE 2

Percentage of Total Selections (GS-13/14/15)

<u>Year</u>	<u>Minority Women</u>	<u>Minority Men</u>	<u>White Women</u>	<u>White Men</u>	<u>Total</u>
1977	0.0	0.0	8.9	91.1	100
1978	1.2	4.8	9.2	84.8	100
1979	3.2	5.6	12.6	78.6	100
1980 (through 8-31-80)	3.0	5.4	14.0	77.6	100

Source: Data supplied by Civil Rights Office.

Unfortunately, these statistics provided by Personnel do not break down the total number of positions filled by minority women, minority men, and white women. It may be that most of the progress under the 50-percent goal has been in white women selections, since the 1980 statistics in Table 2 showed declines in minority selections. The Council

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TABLE 3

GS-13/14/15 1980 Selections

<u>Period</u>	<u>Number of Applicants Selected</u>			<u>Percentage of Vacancies Filled by Minorities/Women</u>
	<u>M/W</u>	<u>Others</u>	<u>Total</u>	
4/18-6/13	15	45	60	25
6/16-6/27	9	14	23	39
6/28-7/11	0	2	2	0
7/12-7/25	1	3	4	2.5
8/1 -8/31	1	10	11	9
9/1 -9/30	<u>6</u>	<u>6</u>	<u>12</u>	<u>50</u>
Total	32	80	112	29

Source: Data supplied by Personnel.

believes that for monitoring selections under the 50-percent goal, the Office would get a better reading of the goal's effectiveness by not lumping minorities and women together.

The Council supports the concept of the 50-percent selection goal. Selections made since the establishment of the goal indicate that fuller consideration is being given minorities and women. The Council, therefore, recommends a continuation of the concept of the 50-percent selection goal for minorities and women to assure continued improvement in reducing underrepresentation.

We recognize that the 50-percent goal has been criticized, but we believe that any special emphasis to reduce underrepre-

sentation of minorities and women will cause some resentment. White males will never again be able to have promotions entirely theirs.

The decision is, "Should GAO have a short-term selection rate goal, such as the 50-percent goal, or not?" The Council believes the goal has paid dividends and should be continued to assure continued improvement in reducing underrepresentation.

COMPTROLLER GENERAL'S REPLY

Since 1978, Federal agencies have been required to evaluate their promotion systems according to the Uniform Guidelines on Employee Selection Procedures (Part 1607, 29 CFR). They provide prin-

ciples and guidance for assuring that selection procedures do not discriminate against groups on the basis of race, color, national origin or sex. The fundamental principle underlying the guidelines is that policies or practices which have an adverse impact on employment opportunities of any group violate Title VII of the 1964 Civil Rights Act, as amended, unless justified by business necessity. A selection procedure which has no adverse impact generally does not violate Title VII.

The guidelines adopt a "rule of thumb" as a practical means of determining adverse impact. It is known as the "4/5ths" or "80 percent" rule. To determine whether a selection process conforms with the 4/5ths rule, a comparison is made of selection rates for different groups. A selection rate for any group which is less than 80 percent of the rate for the group with the highest rate is regarded as evidence of adverse impact. Although

examination for adverse impact occurs at each step of the selection process, the courts and EEO enforcement agencies generally hold that when the "bottom line," i.e., selection, shows no overall adverse impact, there is no violation of Title VII, regardless of the impact of a particular component of the process.

A Uniform Guidelines analysis of the Competitive Selection System for the period 1977-80 is presented at Table I. The bottom line (selection) ratio for whites is 12.1 percent. The rate for minorities is 9.8 percent. Applying the 4/5ths rule, the difference in rates is within the equity range.

Note that minorities had a higher rate of selections from certificates than did whites--30.4 percent vs. 24.7 percent. In arriving at the bottom line this difference was enough to offset the adverse impact on minorities which occurred at the certification stage.

Table I
Results of Competitive Selection System
1977-1980 (through 8-01-80)

Group	Persons Applied		Persons Certified		Persons Selected		Group Ratio Selected-Applied
	No.	% Total	No.	% Group	No.	% Group	
White Men	6249	86.9	3005	48.1	711	23.7	11.4
White Female	422	5.9	255	60.4	95	37.3	22.5
Minority Men	363	7.2	114	32.3	35	30.4	9.8
Minority Female	157		54		16		
All	7191	100%	3428	47.7	857	25.0	11.9
White	6671	92.8	3260	48.9	806	24.7	12.1
Minority	520	7.2	168	32.3	51	30.4	9.8
All	7191	100%	3428	47.7	857	25.0	11.9

It is also important to note that minorities were 7.2 percent of the GAO applicant pool from which certificates were assembled. This compares with a group selection rate of 6 percent. Minority selections as a function of their representation in the applicant pool shows no adverse impact.

Recognizing that in 1977 only 60 minorities applied for competitive selection, with none being selected, it is useful to examine the system's results for the 1978-80 period. This is done in Table II.

The bottom line shows a vast improvement with only a 0.3 percent difference between white and minority selection rates. While minority adverse impact is still present at the certification stage with a rate difference of 16.6 percent, this is balanced by a minority selection

rate which is 14.1 percent higher than that of whites. Further, during the three-year period minorities accounted for 7.8 percent of the GAO applicant pool and they were 7.7 percent of persons selected. The balance between the system's input and output is almost perfect. Nevertheless, a study is now underway to determine---to the extent it can be---why a disproportionate percentage of minorities do not make certificates. Corrective actions will be taken if nonlegitimate reasons for the disparity are found.

The analyses prepared by the EEOAC focus on minorities and women as percentage of total selections without regard to their corresponding representation in the applicant pool. This approach fails to consider the Uniform Guidelines and applicant flow rates as the principal determinants in assessing the equity of any competitive selection system.

Table II
Results of Competitive Selection System
1978-1980 (through 8-01-80)

Group	Persons Applied		Persons Certified		Persons Selected		Group Ratio Selected-Applied
	No.	% Total	No.	% Group	No.	% Group	
White Men	5027	85.8	2482	49.4	537	21.6	10.7
White Female	373	6.7	224	60.0	78	34.8	20.9
Minority Men	318	7.8	103	33.5	35	34.0	11.1
Minority Female	<u>142</u>		<u>51</u>		<u>16</u>		
All	5860	100%	2860	48.8	666	23.3	11.4
White	5400	92.2	2706	50.1	615	19.0	11.4
Minority	<u>460</u>	<u>7.8</u>	<u>154</u>	<u>33.5</u>	<u>51</u>	<u>33.1</u>	<u>11.1</u>
All	5860	100%	2860	48.8	666	23.3	11.4

The 50-percent selection goal for minorities and women which was set in FY 1980 was not intended as a long-term strategy because it is not compatible with the Uniform Guidelines. Consequently, it has been eliminated as a GAO objective. It was initiated because we were entering a freeze period and it was my desire that women and minorities not become invisible during the stringent promotion period.

ADVISORY COUNCIL'S CONCLUSION

The Council is puzzled by the Comptroller General's response to our discussion of how minorities and women fared under Competitive Selection. We merely noted that progress has clearly been made since 1977, although minority selections did drop slightly from 1979 to 1980. The Comptroller General responded with a lengthy discussion of guidelines and statistics to show that the Office had not violated Title VII. The Council did not even imply that such a violation had occurred. The response was, in our view, overly defensive.

Regarding the 50-percent selection goal, the Council realizes that the goal was not intended as a long-term strategy. Unfortunately, the Office has never really done an effective job in defining its long-term strategy. The Council hopes that actions the Office is taking to strengthen affirmative action planning (see later section of this report) will help.

Minorities And Women Are Still Underrepresented At GAO's Higher Grade Levels

ADVISORY COUNCIL'S STATEMENT

From available information, we analyzed the progress of minority persons and women toward greater representation in the GAO employee ranks. For the statistical analysis, minorities and women were grouped together and their progress vis-a-vis nonminority men was charted for the decade of the seventies. In 1972, approximately 70 percent of the GAO employees were nonminority men. Since that time, there has been a gradual and steady increase in the percentage of employees who are minorities and women. This group grew as a percent of the total number of employees from approximately 30 percent in 1972 to approximately 43 percent in 1980. The progress has been steady but not dramatic. (See Table 4.)

The progress that has been made by minorities and women in becoming more represented in GAO has largely taken place at the lower GS grade levels. The main progress has occurred in the GS-7 through -12 range. Minorities and women were only 28 percent of the total employee population in those grades in 1975; they currently comprise 54 percent. However, at the GS-13 and higher grade levels, progress has been small and limited. In 1975, minorities and women made up only 3.5 percent of the GS-16 through -18 employees. Today, that figure has increased to 7 percent, but this still represents a very small fraction of the agency's top management. Tables 5 and 6 present the statistical analysis of the GAO employee data for the years 1975 and 1980. Table 7 presents an analysis of GAO's profile by grade, sex, and racial category as of July 1980.

TABLE 4

GENERAL ACCOUNTING OFFICE

Analysis of GS Employees by Sex and Racial Status

<u>Year</u>	<u>Non-Minority Men</u> (Percent)	<u>All Others</u> (Percent)	<u>Total</u> (as of June)
1972	70.4	29.6	4764
1973	*	*	*
1974	66.0	34.0	5189
1975	67.8	32.2	4990
1976	65.5	34.5	5292
1977	63.5	36.5	5331
1978	61.4	38.6	5359
1979	60.6	39.4	5346
1980	56.7	43.3	5685

*Not available.

TABLE 5
GENERAL ACCOUNTING OFFICE
1975

Analysis of General Schedule Employees by Grade, Sex, and Race

<u>Grade</u>	<u>Non-Minority Men</u> (Percent)	<u>All Others</u> (Percent)	<u>Total</u>
GS 1-6	7.9	92.1	887
GS 7-12	71.6	28.4	2510
GS 13-15	94.7	5.3	1517
GS 16-18	96.5	3.5	86

TABLE 6
GENERAL ACCOUNTING OFFICE
1980

Analysis of General Schedule Employees by Grade, Sex, and Race

<u>Grade</u>	<u>Non-Minority Men</u> (Percent)	<u>All Others</u> (Percent)	<u>Total</u>
GS 1-6	9.5	90.5	1155
GS 7-12	45.8	54.2	2467
GS 13-15	89.1	10.9	1980
GS 16-18	92.9	7.1	84

TABLE 7

GENERAL ACCOUNTING OFFICE

Analysis of General Schedule Employees by Grade,
Sex, and Racial Category as of July 1980

<u>GS Grade</u>	<u>Minority Women</u>	<u>Minority Men</u>	<u>Non- Minority Women</u>	<u>Non- Minority Men</u>	<u>Total Women</u>	<u>Total Men</u>	<u>Total</u>
1-4	229	49	263	67	492	116	608
% of total	37.7	8.1	43.3	11.0	81.0	19.1	
5	138	17	138	37	276	34	330
% of total	41.8	5.2	41.8	11.2	83.6	16.4	
6	107	3	101	6	208	9	217
% of total	49.3	1.4	46.5	2.8	95.9	4.1	
7	99	56	191	141	290	197	487
% of total	20.3	11.5	39.2	29.0	59.5	40.5	
8	11	1	29	1	40	2	42
% of total	26.2	2.4	69.0	2.4	95.2	4.8	
9	60	37	131	142	191	179	370
% of total	16.2	10.0	35.4	38.4	51.6	48.4	
10	2	0	5	1	7	1	8
% of total	25.0	0	62.5	12.5	87.5	12.5	
11	42	37	114	156	156	193	349
% of total	12.0	10.6	32.7	44.7	44.7	55.3	
12	65	142	172	832	237	974	1,211
% of total	5.4	11.7	14.2	68.7	19.6	80.4	
13	17	36	83	835	100	871	971
% of total	1.8	3.7	8.5	86.0	10.3	89.7	
14	3	25	28	612	31	637	668
% of total	.4	3.7	4.2	81.6	4.6	95.4	
15	2	8	13	318	15	326	341
% of total	.6	2.3	3.8	93.3	4.4	95.6	
16-18	0	4	2	78	2	82	84
% of total	0	4.8	2.4	92.8	2.4	97.6	
Total	775	415	1,269	3,226	2,004	3,641	
% OF TOTAL	13.6	7.3	22.3	56.7	36.0	64.0	

COMPTROLLER GENERAL'S REPLY

The substantial difference between improvement rates in the employment profile of minorities and women in grades 7-12 and 13 and above during 1975-80 is at once a function of time, the career ladder, and the competitive selection system. Clearly, there are many more opportunities to produce change in the career ladder profile than exist at grades 13 and above. For example, during the period June 1978-79 a total of 555 career-ladder promotions were made in the GS-343 and -510 series, compared to only 216 competitive promotions. The opportunities to effect improvement in grades 13-15 were therefore less than 40 percent of those at the lower grades.

During the same period, minorities and women accounted for 41 percent of all career-ladder promotions, compared to 17 percent of competitive promotions. The rate at which the employment profile can be reasonably expected to improve beyond grade 12 is also dictated by the percentage of minorities and women in the "applicant pool," i.e., those persons who are eligible and apply for competitive promotions.

The percentage of GAO minorities and women in the competitive applicant pool more than doubled between 1977 and 1980, rising from 8.2 percent to 17.3 percent. Each year since 1977 the ratio of minorities and women selected through the competitive process has equaled or exceeded their representation in the applicant pool. For example, in 1978 their combined selection rate was 3.4 percent greater than their applicant pool representation, and in 1979 it was 7.5 percent greater.

Since we have determined that the competitive selection process does not have a "bottom line" adverse impact on minorities and women, the key to improving the employment profile in the competitive grades will continue to be increasing their representation in the applicant

“From available information, we analyzed the progress of minority persons and women getting greater representation in the GAO employee ranks. For the statistical analysis, minorities and women were grouped together and their progress vis-a-vis non-minority men was charted for the decade of the seventies. In 1972, approximately 70 percent of the GAO employees were non-minority men. Since that time, there has been a gradual and steady increase in the percentage of employees who are minorities and women. This group grew as a percent of the total number of employees from approximately 30 percent in 1972 to approximately 43 percent in 1980. The progress has been steady but not dramatic. (See table 4.)

The progress that has been made by minorities and women in becoming more represented in GAO has largely taken place at the lower GS grade levels. The main progress has occurred in the GS-7 through -12 range. Minorities and women were only 28 percent of the total employee population in those grades in 1975; they currently comprise 54 percent. However, at the GS-13 and higher grade levels, progress has been small and limited. In 1975, minorities and women made up only 3.5 percent of the GS-16 through -18 employees. Today, that figure has increased to 7 percent, but this still represents a very small fraction of the agency's top management. Tables 5 and 6 present the statistical analysis of the GAO employee data for the years 1975 and 1980. Table 7 presents an analysis of GAO's profile by grade, sex, and racial category as of July 1980.”

pool. This takes time. For example, an analysis of GS-343 and -510 career-ladder and competitive promotions made between June 1978-79 shows that on average it takes 4.4 years to move from GS-7 to GS-12, 3 years to go from GS-12 to GS-13, and 4.5 years to go from GS-13 to GS-14. Recognizing that GAO's entry-level affirmative recruitment program did not begin to produce significant results until 1974-75, we should not expect the full impact of this effort to register on our competitive grades until the 1982-87 period. Of course, this presumes that

the internal applicant pool is not significantly eroded by attrition, a factor which we will continue to keep a close eye upon.

The term "underrepresentation" applied to the employment of minorities and women can be troublesome unless it is carefully defined and all parties apply a common definition. The complexities surrounding the definition and measurement of "underrepresentation" were recently outlined by GAO in a report to the Congress entitled "Achieving Representation of Minorities and Women in the Federal Work Force" (FPCD-81-5, December 3, 1980). In the weeks and months ahead we shall be developing a system to provide reasonable employment representation goals, timetables for their achievement, and procedures for monitoring progress and problems. We shall keep the EEOAC and other interested groups briefed as this effort goes forward.

GAO Needs Better Affirmative Action Planning

ADVISORY COUNCIL'S STATEMENT

The Council recommends that GAO improve its affirmative action planning in three ways: (1) obtaining more involvement by the EEO Advisory Council (EEOAC) at the front end of plan development, (2) citing more specifics in terms of actions to be taken, and (3) unifying short- and long-term goals for reducing underrepresentation in the work force.

In the past, the Civil Rights Office has requested EEOAC's comments after completing the draft of the annual affirmative action plans. However, the Council believes it could more effectively assist the Civil Rights Office in improving the plan's quality by providing input at the front end of plan development. We had serious problems with the 1980 plan but did not have time to review it in detail and make suggestions to the completed draft.

In many cases, the 1980 plan needs more specific information to serve as a guide for agency actions. For example, in the section which identifies "Impediments to the Elimination of Underrepresentation" and "Actions to be Taken," the following is stated:

IMPEDIMENTS

Currently, there is not an effective training program for minorities and women to improve their skills or to acquire the knowledge needed to meet the minimum qualifications as well as to be promoted into more highly skilled jobs.

There has been an increasing cluster of women and minorities in clerical and support positions.

ACTIONS TO BE TAKEN

Develop and implement a training program which would place an emphasis on training and developing minorities to improve their opportunities for managerial or other positions.

Strengthening training programs so as to afford capable employees the opportunities to move upward.

These statements are vague, leaving several questions unanswered. Who is responsible for what actions? When will the actions be taken? What priority is given each of the actions?

The effectiveness of GAO's affirmative action planning is limited by the lack of unified goal setting. There are underrepresentation-related goals in the 1980 plan, developed according to Equal Employment Opportunity Commission (EEOC) guidelines; there are the 2- and 5-year division and office goals; there is the 50-percent selection goal to select women and minorities for GS-13/14/15 vacancies; and most recently there are 1985 and 1990 goals for women and minority representation on the professional staff. How do these various goals fit together? Is GAO going to continue to use EEOC's guidelines in developing goals? The Council cited statistics in previous sections which demonstrated that GAO's problem is having not enough minority and women professionals, GS-13 through GS-18. Will the Office retain special emphasis on representation of minorities and women at the higher grade level within overall work force goals?

COMPTROLLER GENERAL'S REPLY

There is no question that FY 1980 was a difficult year for affirmative action program planning, not only in GAO but in most Federal agencies. Many of the difficulties stemmed from the fact that it was a "transition" year during which both the Equal Employment Opportunity Commission (EEOC) and the Office of Personnel Management (OPM) worked toward developing and implementing an entirely new AAPP concept in the Federal sector as a prelude to multiyear program planning. The varied problems experienced during the transition year and recommendations for improving the process in the future are discussed in a GAO report to the Congress entitled "Achieving Representation of Minorities and Women in the Federal Work Force" (FPCD-81-5, December 3, 1980).

Although GAO was not obligated in FY 1980 to follow the exact letter of EEOC directives regarding affirmative action plans, we felt that we should apply the same guidelines mandated for other agencies. In the future we shall develop GAO rules, regulations and procedures along lines generally established for Federal agencies, but only to the extent we think practicable. EEOC is presently in the process of revising its affirmative action planning directives. When they are issued we shall carefully examine them before establishing our own procedures.

We are already moving toward developing our own system for setting numerical goals and timetables. For professional occupations and grade levels they will be based on Relevant Labor Force (RLF) statistics. RLF is the proportion each minority group and women comprises of those persons who are qualified or qualifiable for a particular occupation, including different wage levels within the occupation. Goals and timetables for nonprofessional occupations will be established according to Civilian Labor Force (CLF) statistics. CLF is the overall average proportion of each minority group and women in the total civilian labor force 16 years of age and over without regard to specific occupations or qualification.

When the dimensions of the GAO goals system take more concrete shape, you may be sure that the EEOAC and other interested parties will be briefed, with ample opportunity to provide suggestions for improving the system's design. Until the system is put "on line" we shall use the two and five year goals previously developed by division directors and regional managers with assistance from the Civil Rights Office and Personnel.

The EEOAC's concern with "not having enough" minority and women professionals at GS-13 and above is understandable, particularly if "enough" is a function of CLF. What is unknown at this time, however, is exactly what their appropriate representation should be in terms of the present and future RLF. The level of emphasis which GAO will place on improving the representation of minorities and women in the higher grades will in large measure be determined by the new goals system.

On this point, the Federal Affirmative Action Guidelines appropriate under Title VII of the Civil Rights Act of 1964, as amended (see the Federal Register, January 19, 1979) are instructive: "The action taken pursuant to an affirmative action plan or program must be reasonable in relation to the problems disclosed by the (employer's) self analysis. Such reasonable action may include goals and timetables or other appropriate employment tools which recognize the race, sex, or national origin of applicants or employees....Goals and timetables should be reasonably related to such considerations as the effects of past discrimination, the need for prompt elimination of adverse impact or disparate treatment, the availability of basically qualified or qualified applicants, and the number of employment opportunities expected to be available."

ADVISORY COUNCIL'S CONCLUSION

According to the Civil Rights Office, GAO will obtain the Relevant Labor Force data by June and use EEOC guidelines to help identify unified goals. These goals will serve as a basis for a fiscal year 1982 affirmative action plan for GAO. The Council believes that steps are being made in the right direction. We will continue to monitor the development of goals and plans.

GAO Employees Are Not Receiving Performance And Career Development Counseling

ADVISORY COUNCIL'S STATEMENT

Through a number of actions, GAO has recognized the vital link between performance and career development counseling and improving the quality of its work. It has established the Career Development and Counseling Center. It has also completed a new performance appraisal system (BARS) and sponsored the Skills for Performance and Career Development (SPCD) course for auditors, the development of a revised SPCD course for nonauditors, and supervisory training courses.

But despite top management's commitment to staff needs for career development and counseling, most divisions, offices, and individual supervisors are not providing the counseling that is needed and desired by many GAO employees. Council representatives have discussed this issue with the Counseling Center and many professional and support employees, and the following concerns were expressed:

1. Performance counseling and feedback should not be limited to the completion of an assignment, but should be provided continuously.
2. Supervisors should be informing subordinates of specific strengths and weaknesses in relation to the performance of work assignments.
3. Divisions and regional offices formally or informally rank their employees for the purpose of making recommendations on Competitive Selection System Form 503. For example, a select few employees are given "exceptional" endorsements. The divisions and offices do not explain, based on explicit criteria, how their staff were ranked and what an individual must do to become "exceptional."

We realize that, in some cases, employees are not aggressive about soliciting counseling and feedback from their supervisors or organizational units. This is no excuse, however, for not assuring that counseling, which is so important for GAO's quality of work, is effectively carried out.

The Council believes that accountability is the key to top management's assuring that employees receive performance and career development counseling continuously from supervisors and periodically from divisions and offices. Therefore, we recommend that GAO divisions and offices (1) monitor the type and frequency of performance and career development counseling provided to their employees and (2) develop explicit criteria for staff rankings and explain to any inquiring staff members why they are ranked as they are. We also recommend that Personnel monitor and report to the Comptroller General on actions taken by divisions and offices to implement the above recommendation.

COMPTROLLER GENERAL'S REPLY

The Counseling and Career Development (CCD) Branch of Personnel offers a wide range of performance and career development counseling for GAO employees. These counseling services range from individual counseling to workshops to the Career Resource Center. Specific programs are described below.

Counseling for the Troubled Employee

In October 1976 the Comptroller General instituted GAO's "Employee Assistance Program" (EAP), which offered all employees counseling and referral assistance for the wide variety of personal problems experienced in our complex social and work environments.

In 1979 the CCD's services expanded to include not only social, psychological and substance abuse problems but career counseling and career development issues too. This counseling approach offers a larger variety of services and should logically increase the effectiveness of the substance abuse portion of the counseling program as well.

The CCD has counseled, referred and consulted with GAO employees on problems and situations related to stress, alcohol and drug dependency, marriage, family, co-worker and other interpersonal relationship conflicts, legal and financial concerns, retirement, career development and many other life transitions and crises. The CCD staff also provides training, education, development and other outreach programs on career, social and mental health issues along with supervisory training and education in identifying and assisting employees with personal problems that affect the quality of work and work life.

Developmental Workshops

Through developmental workshops offered by CCD, employees have an opportunity to enhance their potential and development both on the job and in their lives outside of work. These workshops, offered on an "as needed" basis to divisions and regional offices, address a broad range of developmental issues. They include:

- (1) Stress Management Workshop
- (2) Positive Communications Workshop
- (3) Problem Recognition and Referral Workshop
- (4) Career Planning Workshop for Employees
- (5) Career Development Orientation for Managers
- (6) Retirement Planning Workshop

The more effective the careers of its employees, the more effective the total organization will be. For the optimal use

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of human potential to occur, the organizational environment must be rich and permit individuals to search, choose, and integrate their careers.

The workshops developed and offered by GAO are programs that allow individuals to examine attitudes and values about their functions and identities.

Career Resource Center

Faced with the challenge of providing effective career/life at different life stages and career levels, the CCD staff developed a Career Resource Center which is composed of a series of self-managed career/life planning activities. The Center serves a dual purpose. It is designed to enable the individual employee to develop and implement short- and long-range goals by working independently or

by enlisting the help of a counselor or supervisor. The Center is also intended as a tool to assist managers in promoting and facilitating career development of staff.

The Career Resource Center, established in February 1979 in GAO headquarters, is available for use by all employees in the Washington metropolitan area. The Center has also been packaged for the 15 GAO regional offices. It is accompanied by an instruction manual for managers and supervisors who will be working as career planning facilitators. The layout of the Center includes four activity stations, each corresponding to one of the major phases of the career/life planning process.

Performance Counseling

The GAO Personnel Act of 1980 requires that GAO establish a system for appraising the performance of all personnel. This has been interpreted to include not only the development of standards, forms, and administrative procedures, but also to include a system to ensure prompt and effective feedback to staff members on their performance and career prospects. To accomplish this, managers and supervisors need three things: appraisal tools, motivation, and ability. The Office of Organization and Human Development has established a Performance Appraisal Task Force whose mission is to provide for those three key ingredients.

One key task is to develop the appropriate appraisal tools. The Task Force has organized several subgroups to develop standards, forms, and procedures for major occupational groupings and organizational units. They will also be providing advice and assistance to management to develop systems for smaller occupations planning services to the GAO work force of 5,300 men and women and units.

In addition to appraisal tools, managers and supervisors also need to be

motivated to do an effective job of appraisal since appraising and counseling staff is often a stress-producing activity. Support of performance appraisal and implementation of Individual Development Plans (IDPs) have been made mandatory elements of SES performance agreements. In addition, the guidance on the Behaviorally Anchored Rating System (BARS) and the policies on those systems yet to be developed will require that supervisors be rated on how well they perform their duties in the appraisal area. Our ultimate aim, in this regard, is to develop top-down commitment to the importance of performance appraisal and develop a meaningful accountability mechanism in order to foster motivation to provide effective feedback.

The third essential ingredient is "ability" to do effective appraisals and counseling. Substantial activity in this area has already taken place. Most units have completed training their audit staff in "Skills for Performance and Career Development" (SPCD). This course has also been adapted to other employee groups and the SPCD for nonauditors is almost ready for wide-scale presentation. In addition, there will also be a training or orientation component accompanying each performance appraisal system which is put into effect in GAO.

ADVISORY COUNCIL'S CONCLUSION

For the past 2 years the Council has recommended that the Office develop explicit guidelines on staff ranking so that employees can find out what they have to do to improve their rankings and chances for promotion. The Office has recently taken an important step in the right direction. Although this step was not mentioned in the Comptroller General's response, Competitive Selection Form 503s have been amended to document counseling of the applicants. Now what is needed is explicit, written criteria for performing this counseling. Without such criteria, discriminatory practices are much more likely to occur.

GAO Should Continue The Practice Of Inviting Minorities And Women To Serve As Comptroller General Luncheon Speakers And Expert Panelists

Advisory Council's Statement

The Council believes the Comptroller General's luncheons and expert panels offer an excellent opportunity for demonstrating GAO's support for EEO. By inviting women and minorities to serve as speakers and panelists, the Office does two things. First, it reinforces for senior managers a positive image of women and minorities. Second, it shows outsiders that GAO does not ignore important contributions being made by women and minorities.

Reviewing the lists of recent luncheon speakers and expert panelists, the Council found that the Office has had good success in obtaining women and minorities. The Council suggests that the Comptroller General commend division directors and other senior managers responsible for organizing luncheons and panels for inviting women and minorities and encourage them to continue this practice.

COMPTROLLER GENERAL'S REPLY

Efforts are made by the division directors who nominate luncheon speakers to present both women and minorities at various Comptroller General luncheons. Sometimes women and minority speakers are secured personally by the Comptroller General. During the month of December, Dr. Percy Pierre, Assistant Secretary of the Army for Research and Development, a black male, served as a luncheon speaker. Persons responsible for nominating speakers will be reminded to present minorities and women whenever the opportunity arises.



