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To all GAO staff:

In calendar year 1985, the Advisory Council on Civil Rights (ACCR) studied many issues concerning equal employment opportunity practices for all GAO staff. This annual report summarizes the council's major work during the year. The council expresses thanks to the GAO staff who worked with us to identify issues and concerns and to those who participated in the surveys during 1985. The council is for all GAO employees, and we encourage your continued participation.

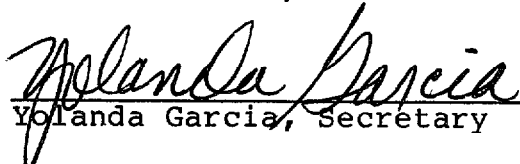
Also, we thank the representatives of the Career Level Council, GAO Chapter of Blacks in Government, Hispanic Liaison Group, GS-13/14 Management and Policy Advisory Council, Secretarial/Clerical Council, and Women's Advisory Council, who coordinated their programs or activities with us to increase the cooperation and communication of all employee advisory groups. In addition, we express our gratitude to all managers and other GAO employees who participated in our meetings.

We hope that you will find this report informative and interesting. The complete texts of all council memorandums and management responses are available upon request. If you desire copies or have any questions, please contact your ACCR 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 make your views known to top management.

Your Advisory Council on Civil Rights

  
Jane D. Trahan, Chair

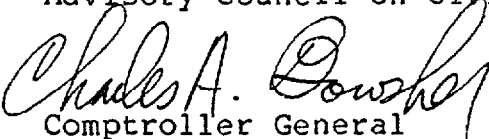
  
Charlie Daniel, Vice Chair

  
Yolanda Garcia, Secretary

*Memorandum*

July 31, 1986

TO : Advisory Council on Civil Rights - Jane Trahan

FROM :  Comptroller General

SUBJECT: Council's 1985 Annual Report

Thank you for providing me with the Advisory Council on Civil Rights' (ACCR) 1985 annual report. The report covers several matters of importance to GAO, and will be most useful in helping us further implement GAO's civil rights program.

I fully recognize the importance of making additional progress in GAO in the civil rights area. We will continue to monitor GS-12 performance appraisal data for relevant trends. We have recently begun an effort to better clarify and explain the job assignment process in GAO units and will continue our initiative of moving to unit-specific hiring and promotion goals, reinforced by inclusion in SES contracts. Our regular assessment of the Upward Mobility Program will pay particular attention to the questions raised in the report. Finally, I have asked the responsible officials to address the lack of proper evacuation procedures for our non-ambulatory employees in regional offices.

I also wish to thank the ACCR for its comments in 1985 on Pay for Performance options, the Personnel Appeals Board's draft oversight report, and proposed changes for the third annual assessment cycle.

I look forward to meeting with you on these and other civil rights matters.

cc: Ms. Curtis, Secretary (ACCR)

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ABBREVIATIONS

|        |   |
|--------|---|
| ACCR   | Advisory Council on Civil Rights                  |
| ACG-HR | Assistant Comptroller General for Human Resources |
| PAB    | Personnel Appeals Board                           |
| PACs   | Pay Adjustment Categories                         |
| SES    | Senior Executive Service                          |
| UMP    | Upward Mobility Program                           |

## INTRODUCTION

The General Accounting Office's Advisory Council on Civil Rights (ACCR) provides advice and guidance to GAO management on equal employment opportunity matters. Information about the council's establishment and purpose, the names and locations of its officers and other members, and recent changes to its charter and bylaws are presented in this introduction.

### WHAT IS THE ADVISORY COUNCIL ON CIVIL RIGHTS?

On September 23, 1971, the Comptroller General established the Equal Employment Opportunity Advisory Council to bridge the communication gap between management and employees. The name of the council was recently changed to the Advisory Council on Civil Rights. The council's purpose is to

- o provide a medium for employees to participate with management in civil rights matters;
- o improve communication with management by providing a channel for expressing employee attitudes, aspirations, and problems in civil rights matters;
- o comment on proposed changes to Office-wide policies and practices affecting the treatment of GAO employees;
- o make recommendations to the Comptroller General and top-level management on Office policies, practices, and procedures that affect equal employment opportunity; and
- o help develop civil rights action plans by providing substantive and precise recommendations for plan content and by commenting on final proposals before submitting them to the Comptroller General.

RECENT CHANGES TO THE COUNCIL'S  
CHARTER AND BYLAWS

On August 29, 1984, the Comptroller General approved the Civil Rights Advisory Council's new charter and bylaws. Under the new charter and bylaws, the council's name was changed to the Advisory Council on Civil Rights and its structure and operation were brought in line with other GAO special interest groups.

The council has expanded its membership to include representatives from both headquarters and regional units, as well as nonvoting associate members from other employee organizations--Blacks in Government, the Hispanic Employment Program Liaison Group, and the Women's Advisory Council. The new charter also established a management committee, consisting of the council's three officers, which is responsible for implementing the council's decisions, carrying out administrative functions, and coordinating council activities. The accompanying bylaws established the council's committee system with three standing committees: (1) affirmative action, (2) discrimination complaint processing, and (3) general civil rights matters.

Under the new charter, ACCR operates on a calendar year basis. Elections are held each November, and newly elected representatives take office in January. The council's 1985 membership is shown in table 1.

Table 1: ACCR 1985 Membership

Jane Trahan, Chair

| <u>Division/Office</u> | <u>Representatives</u>              | <u>Alternates</u>                  |
|------------------------|-------------------------------------|------------------------------------|
| AFMD                   | Barney L. Gomez<br>Gayle L. Condon  | Otto Williams<br>Jagdish C. Narang |
| Comb.a                 | Susan E. Taylor                     | David Hackett                      |
| GGD                    | Charlie W. Daniel<br>La Brenda Dean | Tyrone Mason<br>Domingo Nieves     |
| GS&C                   | Anthony Chaffier<br>Harold Miles    | Gerard Burke<br>Brenda Curtis      |
| HRD                    | Benjamin Ross<br>Frank Guido        | Dennis Gehley<br>Gregory Gamble    |
| IMTEC                  | Fred Chasnov                        | Jane Dunkelburger                  |
| NSIAD                  | Norman Thorpe<br>Noble Holmes       |                                    |
| OGC                    | Brenda Barnes                       | Reba Carey                         |
| PEMD                   | Pearl Brewer                        | Wilfred Holloway                   |
| PERS                   | Sandy C. Hagans<br>Marisol Aponte   | Brenson E. Long                    |
| RCED                   | Debra Bonde<br>Julian King          | Dan Semick<br>Donna Lucas          |

aCombined small offices.

| <u>Region</u>               | <u>Representatives</u>         | <u>Alternates</u>                   |
|-----------------------------|--------------------------------|-------------------------------------|
| Atlanta                     | Gene M. Barnes                 | Mario Artesiano                     |
| Boston                      | Thomas Kaminskis               | Valeria Gist                        |
| Chicago                     | Jimmie Gilbert                 | Willie Bailey                       |
| Cincinnati                  | Richard Edwards                | John Butts                          |
| Dallas                      | Ruben Green                    | Mary Muse                           |
| Denver                      | Arleen Alleman                 | Alan J. Wernz                       |
| Detroit                     | Robert Readler                 | Laura Miner                         |
| Kansas City                 | Edward Gamino                  | Lillian Donaldson                   |
| Los Angeles                 | James Moses                    | Richard Herrera                     |
| New York                    | John Carrera                   | Grace Haskins                       |
| Norfolk                     | Joseph A. Rutecki              | Jose Watkins                        |
| Philadelphia                | Joseph Margallis               | Shahied Dawan                       |
| San Francisco               | David Alston                   | Valarie Lau                         |
| Seattle                     | Sherry Davis                   | Janet George                        |
| Washington                  | Jose Estella<br>Yolanda Garcia | Bernard Anderson<br>Jennifer Thomas |
| <u>Associate members</u>    |                                |                                     |
| Blacks in<br>Government     | Brenson E. Long                | Bernard Anderson                    |
| Women's Advisory<br>Council | Susan E. Taylor                |                                     |
| Hispanic<br>Liaison Group   | Mario Artesiano                | Alice Norsworthy                    |



MATTERS/ISSUES ADDRESSED  
BY THE COUNCIL

During this reporting period, we addressed several matters and issues, including

- GS-12 performance appraisals,
- the job assignment process,
- the affirmative action plan's hiring and promotion goals,
- handicap evacuation plans in regional offices, and
- the Upward Mobility Program.

A discussion of each issue follows.

GS-12 PERFORMANCE APPRAISALS

We are concerned because two studies by GAO's Personnel Systems Development Project staff showed that minorities received lower average performance appraisals than nonminorities in GS-12 evaluator and related positions. This disparity results in fewer promotion and award opportunities for minorities under the merit selection process.

On December 17, 1985, we requested that GAO management conduct a similar study of GS-12 performance appraisals for the 1985 merit selection process. We believed another study would be worthwhile in determining whether the disparity in performance appraisals was continuing. If the disparity continued for the third year, it would be even more of an indication that further action to address the issue was warranted.

On January 27, 1986, the Assistant Comptroller General for Human Resources responded to our December 1985 memorandum. The results of the analysis of the 1985 GS-12 performance appraisals, fully discussed in appendix I, are summarized below.

--Ratings for nonminorities were higher than those for minorities.

--Ratings for females tended to be higher than those for males in both nonminority and minority groups. This was also true in 1983 and 1984.

#### JOB ASSIGNMENT PROCESS

In October 1985, we distributed to a sample of GS-11 through GS-14 evaluators a questionnaire concerning the job assignment process in their units. The document was distributed in two headquarters divisions and two regional offices. In total, 188 questionnaires were distributed and 161 (86 percent) were completed and returned. Although the results are not projectable Office-wide, we believe they provide insight into staff perceptions of the assignment process and indicate some areas that could be improved.

The results indicated that the majority of the staff (69 percent) were satisfied with their job assignments during the last 2 years, and many (63 percent) responded that they had direct input into these assignments. There is some indication, however, that staff are not fully knowledgeable about the assignment process and therefore have some negative perceptions.

While most staff (78 percent) responded that job assignments were very important in the promotion process, over two-thirds (69 percent) said that they did not have a clear understanding

of the assignment process itself. Further, over 90 percent responded that their units did not have a written policy addressing job assignments or that they did not know if one existed.

Regarding factors that management considered when staffing assignments, the respondents perceived that staff availability was the most important factor. Staff development, skills and expertise, and preferences were perceived to be among the least important factors. The staff, on the other hand, considered the opportunity to supervise, to use their skills and abilities, and to develop new skills as the most important factors.

About one-third responded that assignments providing substantial promotion potential ("the glamor assignments") were not fairly distributed among the staff, and 40 percent responded that fully successful ratings would afford them little opportunity to get one of these assignments. Further, nearly one-half (48 percent) observed that assignment start dates were changed to accommodate certain staff members.

When asked what, if anything, they would change about the job assignment process in their units, the staff responded as follows:

- Improve communication about assignments.
- Develop clear written policies and procedures.
- Provide more developmental opportunities.
- Provide better feedback on staffing decisions.
- Build honesty and credibility into the process.

The questionnaire and results are shown in appendix II.

## AFFIRMATIVE ACTION GOALS

We made a review to determine

- how GAO establishes its affirmative action plan and whether the plan is adequate,
- what problems GAO management encounters in meeting affirmative action goals, and
- whether GAO is successful in achieving its affirmative action goals.

Our review focused on the evaluator and evaluator-related job series because these groups comprise 70 percent of GAO's employees. Our work was done in the Atlanta, Kansas City, and New York Regional Offices and in the Accounting and Financial Management Division. The results of our work, discussed in detail in appendix III, are summarized below.

### Establishment of the Affirmative Action Plan for Hiring and Promotion Goals

At the time of our review, GAO's affirmative action plan was developed by the Civil Rights Office in consultation with the Assistant Comptroller General for Human Resources (ACG-HR). The plan, which was approved and signed by the Comptroller General, established entry level hiring and promotion goals on a GAO-wide basis. Although entry level hiring goals were not established for individual units, units were provided guidance from the ACG-HR and/or the Director, Civil Rights Office, for establishing such goals for evaluator and evaluator-related staff. No provision was made for establishing unit-specific promotion goals; however, each unit head was instructed to

adhere to EEO principles in the promotion process. Each unit head was responsible for implementing the agency's initiatives to meet hiring and promotion goals. The Civil Rights Office was responsible for monitoring and reporting to management on whether promotion and hiring goals were met.

Before this report's publication, GAO established an Office of Affirmative Action Plans to link its affirmative action programs with employment, promotions, and other line functions. The director of this office reports to the Assistant Comptroller General for Operations.

#### Problems Encountered in Meeting

#### Affirmative Action Goals

Managers in the units contacted provided a variety of reasons for not achieving hiring goals for all target groups. Some of their reasons are provided below.

--A hiring freeze was in effect.

--The recruiting lists of best qualified individuals did not contain enough minorities.

--Promised referrals did not eventuate.

--Some members of a target group did not accept GAO's employment offer.

In addition, we found that Senior Executive Service (SES) contracts did not contain quantitative and qualitative measures regarding affirmative action goals.

Success in Achieving  
Affirmative Action Goals

In fiscal year 1985, GAO achieved its agency-wide affirmative action hiring goals for all target groups except White males. Table 2 compares the hiring results with the hiring goals.

Table 2: FY 1985 Hiring Results Agency-wide

|          | <u>White</u>         |               | <u>Black<sup>a</sup></u> |               | <u>Hispanic<sup>a</sup></u> |               | <u>Other<sup>a</sup></u> |               |
|----------|----------------------|---------------|--------------------------|---------------|-----------------------------|---------------|--------------------------|---------------|
|          | <u>Male</u>          | <u>Female</u> | <u>Male</u>              | <u>Female</u> | <u>Male</u>                 | <u>Female</u> | <u>Male</u>              | <u>Female</u> |
|          | ------(percent)----- |               |                          |               |                             |               |                          |               |
| Goal     | 41.0                 | 37.0          | 7.0                      |               | 10.0                        |               | 5.0                      |               |
| Actual   | 34.3                 | 38.7          | 3.2                      | 8.1           | 7.3                         | 2.8           | 1.2                      | 4.4           |
| Variance | -6.7                 | +1.7          | +4.3                     |               | +.1                         |               | +.6                      |               |

<sup>a</sup>We believe GAO should establish separate goals for males and females in each of the minority groups as it has done for White males and females.

Less success was achieved in meeting promotion goals; GAO achieved its fiscal year 1985 promotion goal for only one target group, Black males and females. GAO promoted 22.1 percent of White females, which came relatively close to achieving its promotion goal of 23 percent. Also, GAO promoted 3.3 percent of persons in the "other" category, which was close to the 4 percent goal. However, the promotion results for Hispanics were not encouraging; GAO's promotion goal was 4 percent, but only 1.7 percent were promoted. Table 3 details the merit system promotions to GS-13 for fiscal year 1985.

Table 3: FY 1985 Merit System Promotions to GS-13

|                  | <u>Number of promotions</u> | <u>Percent actual</u> | <u>Percent goal</u> | <u>Difference</u> |
|------------------|-----------------------------|-----------------------|---------------------|-------------------|
| White males      | 61                          | 50.5                  | -                   | -                 |
| White females    | 27                          | 22.1                  | 23a                 | -0.9              |
| Black males      | 16b                         | 13.1                  | 16a                 | +6.9              |
| Black females    | 12b                         | 9.8                   |                     |                   |
| Hispanic males   | 2                           | 1.7                   | 4a                  | -2.3              |
| Hispanic females | -                           | -                     |                     |                   |
| Other males      | 1                           | 0.8                   | 4a                  | -0.7              |
| Other females    | <u>3</u>                    | <u>2.5</u>            |                     |                   |
| Total            | <u>122</u>                  | <u>100.0</u>          |                     |                   |
| All white        | 88                          | 72.1                  |                     |                   |
| All minorities   | <u>34</u>                   | <u>27.9</u>           |                     |                   |
| All employees    | <u>122</u>                  | <u>100.0</u>          |                     |                   |

aObtained from Affirmative Action Program report for FY 1985 p. 13.

b28 promotions required by settlement of Fogle/Mason decision.

We believe a lack of unit-specific promotion goals may have deterred GAO's efforts in achieving its agency-wide goals. Although we recognize that some units are relatively small, their size should not preclude goal setting. An alternative might be extended affirmative action plans, such as a 5-year plan. This could enhance the opportunities for targeting a particular group over a period of time when a unit has relatively few promotion opportunities on an annual basis.

## Recommendations

We recommend that unit-specific promotion goals be established because they appear to be the best way for coordinating efforts to achieve agency-wide goals.

We also recommend that unit-specific hiring and promotion goals be incorporated into SES contracts. We believe such action would ensure proper attention to affirmative action goals and would prevent these goals from being pushed down on the list of priorities.

We further recommend that affirmative action goal achievement be factored in SES bonus determinations, i.e., pay for performance. We recognize that certain factors and/or impediments could arise which might prevent achieving affirmative action goals. These factors and/or impediments should be reviewed to determine their significance in preventing goal achievement.

## EVACUATION PROCEDURES FOR NONAMBULATORY REGIONAL PERSONNEL

We reviewed evacuation preparedness for nonambulatory staff at all regional offices except the Washington Regional Office, which is located in the GAO Headquarters building. At their respective regional offices, ACCR representatives gathered information on

- the number of mobility handicapped persons,
- building emergency evacuation plans,
- office floor locations, and
- GAO equipment available to evacuate nonambulatory staff and visitors in the event of an emergency.



We found an apparent disparity between the GAO Headquarters building and the regional offices in the type of equipment available to evacuate nonambulatory employees in an emergency. Handicapped employees working in or visiting the regions are not afforded the same degree of safety as their headquarters counterparts.

#### Evacuation Program for Main Building

GAO Order 1010.1 contains procedures to be followed in the following emergency situations: fires, storms, explosions, bombs, bomb threats, civil disturbances, or any other emergency situation affecting the safety of life and property. According to the order, a handicapped person's monitor, upon receipt of an evacuation order, will proceed to the handicapped person assigned to him or her and help that person to an evacuation point. The Office of Security and Safety has procured two folding evac-chairs for use in evacuating handicapped persons from the main building. Both Office of Security and Safety staff and the building guards have been trained in their use.

#### Regional Office Evacuation Programs

Of the 14 regional offices included in our review, 6 had from 1 to 3 employees with a mobility handicap. These were Atlanta, Cincinnati, Dallas, Denver, New York, and San Francisco. The other eight offices had no employees with a mobility handicap.

Except for the Denver Regional Office, which has the use of another building tenant's evac-chair, and the Norfolk Regional Office, which is in a one-story building, the regional offices had not included special equipment for the handicapped in their emergency plans. The most common method cited in the plans to evacuate the handicapped was by elevator. Several plans indicated either stairs or elevators, and two offices had no plans. Moreover, of the five offices that mentioned stairs in

their plans, only Denver had access to equipment for use on stairs.

Table 4 indicates the number of employees with a mobility handicap, the planned evacuation method(s) as described in each regional office's emergency plan, the equipment available, and the regional office floor location.

### Recommendation

We believe GAO should widen the scope of its emergency evacuation procedures to include regional offices. A master plan which includes guidance on equipment purchases and training should be developed and followed. Regional offices should, at a minimum, have the same degree of safety as the GAO main building, and those offices not having employees with mobility problems should be prepared for potential visits by nonambulatory staff.

Table 4: Regional Office Handicap Evacuation Profile

| <u>Regional office</u> | <u>Number of employees with mobility handicap</u> | <u>Planned evacuation method for handicapped</u> | <u>Evacuation equipment for handicapped</u> | <u>Regional office floor location</u> |
|------------------------|---|--|---|---------------------------------------|
| Atlanta                | 1   | Elevator   | None  | 20                                    |
| Boston                 | 0   | No plan  | None  | 19                                    |
| Chicago                | 0   | Elevator/stairs                                  | None  | 5/6                                   |
| Cincinnati             | 1   | Elevator   | None  | 8                                     |
| Dallas                 | 1   | Stairs   | None  | 6                                     |
| Denver                 | 1   | Stairs   | None <sup>a</sup>                           | 3                                     |
| Detroit                | 0   | Elevator   | None  | 8                                     |
| Kansas City            | 0   | No plan  | None  | 7                                     |
| Los Angeles            | 0   | Elevator   | None  | 10                                    |
| New York               | 3   | Elevator   | None  | 41                                    |
| Norfolk                | 0   | Exit ramps                                       | Ramps                                       | 1                                     |
| Philadelphia           | 0   | Stairs   | None  | 11                                    |
| San Francisco          | 2   | Elevator   | None  | 9/10                                  |
| Seattle                | 0   | Stairs/elevator                                  | None  | 19                                    |
| Washington             | N/A <sup>b</sup>                                  | Elevator   | Evac-chairs                                 | 5                                     |

<sup>a</sup>Denver has a chair on loan from another building tenant, but a conflict over priority use could arise in an emergency.

<sup>b</sup>WFO, although a regional office, is covered under the GAO Headquarters building plan and therefore was not considered in our analysis.

## UPWARD MOBILITY PROGRAM

Since 1983, when management revised the Upward Mobility Program (UMP), 19 staff members have entered the program. All 19 positions were in the GS-347 evaluator series. The positions did not include other occupational series, such as writer/editor, computer specialist, and personnel specialist, that had been targeted for providing career opportunities to clerical staff at the program's formation.

Five additional slots were to be announced as management analyst positions in June 1985; however, the slots were announced as management assistants with the target positions of evaluators. To publicize the UMP vacancies throughout GAO, a memorandum was sent to all employees in grades GS-4 through GS-9. As a result, several seminars were held for all interested potential applicants to address the following issues and program requirements.

- o A degree is not a prerequisite; however, to be competitive, the participant should have the ultimate goal of obtaining a degree.
- o At least four specific upper division core college-level courses must be completed.
- o UMP participants convert to entry level evaluator positions without competing with other applicants once they have successfully completed the program.
- o An overall 2.9 grade point average must be maintained.
- o Performance appraisals for work attempted must be fully satisfactory.

- o Persons who do not continue in the program are returned to positions comparable to the pre-UMP positions. The UMP positions are not refilled until the next round of competition for entry into the program, when all available slots are filled.

We believe that orientation seminars, which partially resulted from prior ACCR efforts, have significantly reduced the number of complaints we receive.

Additional information we gathered showed an overall increase in the percentage of selectees who had 4-year college degrees. A breakdown by fiscal year showed that in 1983 only 1 of 10 selectees (10 percent) had a 4-year degree and 5 had 2 or more years of college; in 1984 5 of 9 participants (56 percent) had 4-year degrees and 2 had 2 or more years of college; and in 1985 3 of 5 selectees (60 percent) had 4-year degrees and 2 had 2 or more years of college.

We will continue to monitor implementation of the Upward Mobility Program to

- find out if educational level is a deciding factor in successfully completing the program,
- find out if the increase in college degree selectees adversely affects minorities, and
- determine if there is a need to request that UMP management make available other nonevaluator occupational series.

ISSUES THE COUNCIL  
COMMENTED ON BY REQUEST

We were requested to comment on several issues and concerns, including

--pay for performance,

--the Personnel Appeals Board's first agency-wide EEO oversight draft report, and

--modifications to the third annual assessment cycle.

Our comments on each follow.

PAY FOR PERFORMANCE (PFP)

On November 13, 1985, we commented on GAO's publication, "Pay-for-Performance: An Alternative for the Future," dated September 1985. In general, we support the concept of a pay system that better correlates pay with performance. Although we believe that the financial aspects of the PFP proposals are appealing, we wonder why the organization could not achieve similar financial objectives by appropriately modifying the current pay system. Along these same lines, we have not seen any statements or analyses that have identified deficiencies in the current pay system. Such analysis is a prerequisite for judging the merits of pay system changes.

In addition, we have reservations regarding the organization's PFP proposals. Our primary concern is precipitated by a series of interrelated and complex historical conditions or occurrences which, taken together, demonstrate that PFP warrants more emphasis on EEO. These occurrences and conditions are listed below.

- The ineffective management of the competitive selection and merit system promotion process for evaluator and related positions.
- The lack of minority representation on promotion and/or award panels.
- The lack of quantifiable measures in SES contracts to support and enforce the promotion of EEO principles.
- The disparity in performance appraisals between minority and nonminority GS-12's in evaluator and related positions.

We are greatly concerned that the conditions identified above may continue under a PFP system because none of the PFP proposals as presented, indicates the organization's intent to foster EEO and affirmative action. For example, definitive statements on protecting and preserving EEO principles are lacking. In view of the historical occurrences and conditions cited, we do not take comfort in management's assurances that all parties involved in managing and administering PFP will adhere to EEO principles in their deliberations and determinations.

Safeguards to protect EEO principles must be a part of any pay system. In addition to definitive statements on protecting and preserving EEO principles, these safeguards should include, but not be limited to, the following.

- Ensuring appropriate minority and female representation on all assessment panels.
- Requiring EEO accountability in SES contracts.

- Ensuring that performance appraisals are fair and not based on prohibited personnel practices.
- Maintaining a monitoring system for the assessment process.
- Ensuring that sufficient data are collected to monitor the fairness of job assignments if they are considered in pay decisions.
- Researching and establishing adequate criteria to gauge job complexity if it is a factor in pay decisions.
- Constructing a system to compare the distribution of women and minorities with their peers in all pay ranges before implementing a new pay system.
- Designing a system that allows for employee appeals and review.

In addition, we believe that several other aspects of PFP should be addressed.

- Since Band I has not been fully analyzed, we question whether staff should be asked to evaluate and choose a system without having all the information on which to base their decision.
- If PFP is implemented and extended to administrative and support staff, we are concerned that PFP pay increases for evaluator staff will be greater than the percentage pay increases for comparable GS support and administrative staff. This concern is magnified by the higher proportion of women and minorities in administrative/support positions.



--The behaviorally anchored rating scales (BARs) and the annual assessment process were designed to divide those eligible for promotion into two groups--"best qualified" and "not best qualified." They were not designed to divide employees into pay adjustment categories (PACs).

--There is no direct correlation between BARs and PACs. Without such correlation, staff cannot assess the significance of their own ratings.

--Because of the increased competition for "good jobs" to demonstrate high PAC performance, we are concerned that many evaluators will not be given opportunities to demonstrate their ability in job assignments despite their capabilities.

#### AGENCY-WIDE EEO OVERSIGHT REVIEW

#### BY THE PERSONNEL APPEALS BOARD

We provided comments to the General Counsel, Personnel Appeals Board (PAB), on its first agency-wide EEO Oversight Review. A summary of our remarks follows.

#### Differences in Ratings of GS-12 Evaluators Based on Ethnic/Racial Group Membership

We suggested that the agency determine the underlying reasons why minority performance ratings are lower than nonminority ratings. Without this effort, we believe that problems such as those noted in PAB's report will continue and be exacerbated as more minorities find themselves clustered at the GS-12 level. If this problem is not addressed, it will have a detrimental

impact on all aspects of employment opportunities for minorities. For example, the proposed pay for performance system would disfavor minority evaluators. Also, pay for performance could not be a viable or palatable process to minorities without resolution of the GS-12 rating situation.

Need to Validate the Merit Selection Process

We agreed with PAB's General Counsel that the merit selection process should be validated. In the interim, the agency should identify ways to ensure that minorities and women have equitable opportunities under the present system.

EEO Performance Standards in SES Contracts

We agreed that performance standards in SES contracts should be qualitative and quantitative, especially in the areas of EEO and affirmative action. Accountability at the SES level is of paramount concern. (See our recommendation on p. 12.)

Need to Maintain Discipline Files Longer

We agreed with the need to maintain discipline files longer than 2 years; however, after the 2-year period, we would like to see the information maintained somewhere other than in employees' official personnel folders so that it would be unavailable for future supervisory perusal. We believe these files should be maintained beyond 4 years.

MODIFICATIONS TO THE THIRD  
ANNUAL ASSESSMENT CYCLE

On April 24, 1985, we provided comments to the Assistant Comptroller General for Human Resources on the proposed modification of, and plans for orientation for, the third assessment cycle. Our comments are summarized below.

Modifying Panel Composition Requirements  
for Evaluator-Related Positions

The revised policy is a move in the right direction. However, we believe that, when possible, all panels members should be able to evaluate the applicants' qualifications. When this is not possible, at least half of the panel members should be qualified to do so.

Processing GAO Form 88, Supervisory  
Appraisal on Quality Ranking Factors,  
Through Unit Reviewer

The purpose of this additional review process is not clear. The rationale implies that the reviewer can unduly influence the rating given by the supervisor.

We feel that a definite retention period should be established to ensure that each unit maintains employee performance folders for the same period of time. The term "several promotion cycles" could lead to differences in how long units maintain the folders.

We suggest that the last sentence of paragraph 2 be revised to read as follows:

". . . units will xerox copies of the appraisals required for the assessment year and stamp the

employee performance folders' copy to indicate that it was reviewed in a particular panel process. In addition, a control sheet will be maintained with each folder that describes what documents were reviewed, the date(s) reviewed, and the reason for review. Units are not permitted to use appraisals or other records from an informal personnel file for any reason other than to provide applicable documents to a specific panel in any given year."

COUNCIL PARTICIPATION IN PERSONNEL  
APPEALS BOARD MEMBER SELECTION

The Personnel Appeals Board adjudicates a variety of employee appeals involving labor and employee relations and equal employment opportunity. PAB members are selected by a formal process: organizations external to GAO nominate candidates, and the Comptroller General appoints the PAB members from the nominees after consulting with employee representatives.

In May 1985, the PAB Screening Panel, internal to GAO, asked us to review 19 nominees' application packages. The packages included resumes, samples of decisions and published articles, and answers to questions concerning the nature and extent of the nominees' experience. The panel's objective was to nominate candidates to fill two upcoming vacancies on PAB. Selectees would serve 3-year terms beginning in October 1985. The Chair, Complaints Process Standing Committee, was asked by the ACCR Chair to represent the full council in this effort. Each member of the PAB Screening Panel was asked to select 5 of the 19 applicants for further consideration and possible nomination. The two nominees approved by the Comptroller General included one whom we had recommended.

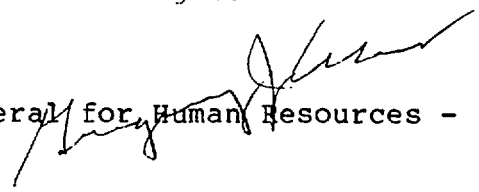
UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

*Memorandum*

January 27, 1986

TO : Chair, Advisory Council on Civil Rights

FROM : Assistant Comptroller General for Human Resources -  
Gregory J. Ahart 

SUBJECT: Analysis of GS-12 Performance Appraisal Data

This responds to your memorandum of December 17, 1985, concerning the GS-12 performance appraisal study. The Organizational Analysis and Planning Branch of OOHG has been analyzing the 1985 BARS performance appraisal data for the past few months. As part of this analysis, they examined performance appraisals for GS-12 evaluators and evaluator-related specialists to determine whether any differences associated with gender or ethnicity existed in BARS ratings. Results summarized by gender (Attachment A) and ethnicity (Attachment B) are provided for your information. (As in past studies, the point value assigned to rating adjectives for analytic purposes were "Exceptional" =5; "Superior" = 4, etc.).

The analyses conducted were limited to the computation of mean ratings on each BARS dimension and summed over all dimensions for each sex and for two ethnic groupings -- non-minority and minority. The analyses by gender indicated that, although ratings for females tended to be higher than those for males, the differences were small. The overall ratings differed by .07, while five dimension differences were .10 or less, and the other three dimension rating differences were between .11 and .17. Similarly, the analyses by ethnicity showed that ratings for non-minorities were higher than those for minorities, and that these differences were larger than those between genders. The overall ratings differed by .14, while two dimension ratings differed by .10 or less, four differed by .11 to .20, and two differences were greater than .20.

With the analysis of the 1985 BARS data and the earlier analyses of the 1983 and 1984 appraisals, it is now possible to look at trends over the past three years. Comparisons of ratings by gender show some variations from dimension to dimension, but no clear changes or trends. In general, females were rated slightly higher than males in all three years. Comparisons of ratings by ethnicity also reveal some variations from dimension to dimension, and there seems to be a slight trend toward a narrowing of the differences between ratings of minorities and non-minorities. From 1983 to 1984, the size of the

differences decreased on five of the BARS dimensions and the overall rating; from 1984 to 1985, the size of the differences decreased on four of the dimensions and the overall rating; from 1983 to 1985, the size of the differences has decreased on seven of the eight BARS dimension and the overall rating. Thus a frequency distribution of the differences by year shows that the sizes of rating differences are gradually decreasing.

| <u>Size of Difference</u> | <u>1983</u> | <u>1984</u> | <u>1985</u> |
|---------------------------|-------------|-------------|-------------|
| less than .10             | 2           | 1           | 2           |
| .10 - .20                 | 1           | 5           | 5           |
| greater than .20          | 6           | 3           | 2           |

These analyses do not indicate the reason(s) for these differences, i.e., whether the differences were associated with 'true' performance levels, years of experience, education, or any number of other possible factors. Ideally, we would like to know why any rating differences exist; yet practically, due to the complexity of comparing jobs or experience or education and numerous other constraints, it would be extremely difficult, if not impossible, to determine the sources of rating differences with any degree of reliability. Furthermore, as the size of the differences decrease, the difficulty of explaining them increases and perhaps the importance of explaining them decreases.

As discussed in previous years, there are two general approaches that might be used to explore whether rating differences are due to 'actual' performance differences. First, we could inquire as to whether rating differences are associated with the race or gender of the rating official. Due to the small number of minority and female rating officials, this would not be a particularly fruitful approach. Second, we could study the relationships between ratings and background characteristics of the ratees to determine to what extent these variables (educational level, grade point average, years of experience, etc.) contributed to any differences in ratings. Although this approach has more merit than the first, it too has many practical and technical problems that would severely limit the usefulness of the study.

Given that neither of these analytic approaches seems to be particularly helpful, what should we do to ensure that the appraisal is carried out well and provides the best possible information to accomplish our human resource management, staff development, and EEO goals? First, this report and these data will be shared with agency management to assist them in reviewing the performance appraisal process and results in their units. Second, as part of the Merit Selection Program validation study, BARS ratings are being analyzed to determine their measurement and psychometric properties, and whether the ratings assess all aspects of performance that should be considered in the annual assessment process. Finally, OOH is offering a

Performance Management course that will help supervisors to more effectively prepare and communicate appraisals, set expectations, monitor behavior, and coach employees. If you have additional ideas or suggestions on steps we should consider taking, I would like to discuss them with you.

In coming years, we will continue to collect and analyze appraisal data. We will include analyses similar to those reported this year and the past two years. These analyses will allow us to monitor the trends in ratings over the next few years.

I will be happy to discuss this report with you and welcome any thoughts you may have related to these issues.

Attachments - 2



## BARS Ratings for GS-12s Summarized by Sex

|                           | <u>1984</u> |               | <u>1985</u> |               |
|---------------------------|-------------|---------------|-------------|---------------|
|                           | <u>Male</u> | <u>Female</u> | <u>Male</u> | <u>Female</u> |
| Job Planning              | 3.79        | 3.81          | 3.84        | 3.86          |
| Data Gathering            | 4.03        | 4.07          | 4.11        | 4.16          |
| Data Analysis             | 3.87        | 3.89          | 3.98        | 3.97          |
| Written Communication     | 3.54        | 3.65          | 3.58        | 3.69          |
| Oral Communication        | 3.76        | 3.83          | 3.75        | 3.88          |
| Administrative Duties     | 3.38        | 3.44          | 3.46        | 3.52          |
| Work Relationship/<br>EEO | 3.87        | 3.99          | 3.96        | 4.13          |
| Supervision               | 3.71        | 3.81          | 3.70        | 3.80          |
| Overall                   | 3.73        | 3.80          | 3.80        | 3.87          |

## MEAN BARS RATINGS BY DIMENSION, JOB SERIES AND ETHNICITY

|                              | <u>1983</u>     |                     | <u>1984</u>     |                     | <u>1985</u>     |                     |
|------------------------------|-----------------|---------------------|-----------------|---------------------|-----------------|---------------------|
|                              | <u>Minority</u> | <u>Non-Minority</u> | <u>Minority</u> | <u>Non-Minority</u> | <u>Minority</u> | <u>Non-Minority</u> |
| Job Planning                 | 3.46            | 3.77                | 3.66            | 3.83                | 3.70            | 3.88                |
| Data Gathering               | 3.75            | 3.96                | 3.92            | 4.09                | 3.98            | 4.17                |
| Data Analysis                | 3.47            | 3.85                | 3.68            | 3.95                | 3.74            | 4.04                |
| Written Communication        | 3.26            | 3.53                | 3.37            | 3.65                | 3.44            | 3.67                |
| Oral Communication           | 3.53            | 3.68                | 3.53            | 3.85                | 3.66            | 3.83                |
| Administrative Duties        | 3.31            | 3.37                | 3.33            | 3.42                | 3.48            | 3.48                |
| Working Relationship/<br>EEO | 3.72            | 3.76                | 3.92            | 3.91                | 4.08            | 4.00                |
| Supervision                  | 3.47            | 3.72                | 3.61            | 3.77                | 3.63            | 3.76                |
| Overall                      | 3.50            | 3.71                | 3.63            | 3.81                | 3.71            | 3.85                |

ADVISORY COUNCIL ON CIVIL RIGHTS  
JOB ASSIGNMENT QUESTIONNAIRE  
GS-11 THROUGH GS-14

A | L | L | 1-3

1. To what extent do you understand the process and procedures your division/region uses to assign staff to jobs? (Circle one).

| little or<br>no extent | some<br>extent | moderate<br>extent | substantial<br>extent | very great<br>extent |
|------------------------|----------------|--------------------|-----------------------|----------------------|
| 1                      | 2              | 3                  | 4                     | 5                    |
| 19                     | 40             | 54                 | 36                    | 13                   |

2. Have you ever formally or informally discussed job assignment procedures? (Check one)

121 YES    40 NO

3. If no go to question 4. If yes, from whom have you received the most information? (Check one)

- 75 peers
- 42 immediate supervisor
- 1 training coordinator
- 37 mid-level managers (group, associate directors, ARMS)
- 5 Division Director/Regional Manager
- 9 other (please specify by title):
- 8 Resource or Staff Manager
- 1 No response

4. To your knowledge, does your division/region have written procedures for assigning staff to jobs? (Check one)

15 YES    65 NO    82 DON'T KNOW

5. The decision to assign staff to a specific job can be based on any number of different factors. Based on your observations and experiences over the last two years, please indicate to what extent you believe your unit has used each of the following factors in assigning staff. (Please circle one response for each factor).

| <u>Job Assignment Factors</u>                                 | <u>little or no extent</u> | <u>some extent</u> | <u>moderate extent</u> | <u>great extent</u> | <u>very great extent</u> | <u>don't know</u> | <u>no ans.</u> |
|---|----------------------------|--------------------|------------------------|---------------------|--------------------------|-------------------|----------------|
| a. Provide supervisory experience                             | 1<br>27                    | 2<br>48            | 3<br>41                | 4<br>27             | 5<br>4                   | 6<br>16           | 2              |
| b. Develop new skills, expertise                              | 1<br>24                    | 2<br>51            | 3<br>50                | 4<br>19             | 5<br>2                   | 6<br>14           | 2              |
| c. Assignment title (EIC, SS, etc.)                           | 1<br>12                    | 2<br>26            | 3<br>54                | 4<br>36             | 5<br>12                  | 6<br>21           | 3              |
| d. Provide developmental experiences for minorities and women | 1<br>34                    | 2<br>26            | 3<br>23                | 4<br>29             | 5<br>7                   | 6<br>38           | 2              |
| e. Use available staff  | 1<br>-                     | 2<br>3             | 3<br>13                | 4<br>68             | 5<br>74                  | 6<br>4            | 2              |
| f. Use staff expertise, skills                                | 1<br>13                    | 2<br>27            | 3<br>53                | 4<br>37             | 5<br>23                  | 6<br>8            | 2              |
| g. Your individual preferences                                | 1<br>24                    | 2<br>52            | 3<br>47                | 4<br>24             | 5<br>4                   | 6<br>9            | 2              |
| h. Travel requirements  | 1<br>43                    | 2<br>37            | 3<br>39                | 4<br>13             | 5<br>3                   | 6<br>24           | 3              |
| i. Other (please specify):                                    | 1                          | 2                  | 3                      | 4                   | 5                        | 6                 |                |
| <u>Groom for promotion</u>                                    | -                          | -                  | -                      | -                   | 3                        | -                 |                |
| <u>Staff preferences</u>                                      | -                          | -                  | -                      | 2                   | -                        | -                 |                |

6. Consider how the job assignment process affected your development for promotional opportunities over the last two years. Indicate to what extent your development was affected relative to your peers (Circle one).

| <u>greatly hindered</u> | <u>somewhat hindered</u> | <u>about the same</u> | <u>somewhat enhanced</u> | <u>greatly enhanced</u> | <u>don't know</u> | <u>no ans.</u> |
|-------------------------|--------------------------|-----------------------|--------------------------|-------------------------|-------------------|----------------|
| 1                       | 2                        | 3                     | 4                        | 5                       | 6                 |                |
| 20                      | 28                       | 38                    | 26                       | 23                      | 25                | 3              |

7. Over the last two years, how important were each of the following job assignment factors to you? (Circle one for each factor)

| <u>Job Assignment Factors</u>               | <u>very important</u> | <u>important</u> | <u>neither important or unimportant</u> | <u>unimportant</u> | <u>very unimportant</u> | <u>don't know</u> |
|---|-----------------------|------------------|---|--------------------|-------------------------|-------------------|
| a. Opportunity to supervise                 | 1<br>62               | 2<br>46          | 3<br>33                                 | 4<br>8             | 5<br>9                  | 6<br>1            |
| b. Obtaining new skills, expertise          | 1<br>56               | 2<br>57          | 3<br>26                                 | 4<br>9             | 5<br>9                  | 6<br>1            |
| c. Assignment title (EIC, SS, etc.)         | 1<br>40               | 2<br>47          | 3<br>39                                 | 4<br>15            | 5<br>14                 | 6<br>2            |
| d. Using your skills, expertise             | 1<br>62               | 2<br>75          | 3<br>9                                  | 4<br>3             | 5<br>5                  | 6<br>1            |
| e. Traveling                                | 1<br>10               | 2<br>23          | 3<br>94                                 | 4<br>14            | 5<br>15                 | 6<br>1            |
| f. Supervisor or manager to whom you report | 1<br>47               | 2<br>63          | 3<br>35                                 | 4<br>5             | 5<br>8                  | 6<br>2            |
| g. Co-workers and subordinates              | 1<br>32               | 2<br>67          | 3<br>43                                 | 4<br>5             | 5<br>7                  | 6<br>2            |
| h. Other (please specify):                  | 1                     | 2                | 3                                       | 4                  | 5                       | 6                 |
| <u>Subject matter pref.</u>                 | 3                     | -                | -                                       | -                  | -                       | -                 |
| <u>Impact on national issue</u>             | -                     | 1                | -                                       | -                  | -                       | -                 |

8. Over the last two years, have you had any direct input into your assignment to jobs? (Check one)

101 YES    54 NO    5 DON'T KNOW

If no, go to question 10.

9. How effective were you in influencing the job assignment decision in each of the following job assignment factors?

| <u>Job Assignment Factors</u>               | <u>very effective</u> | <u>effective</u> | <u>neither effective nor ineffective</u> | <u>ineffective</u> | <u>very ineffective</u> | <u>don't know</u> |
|---|-----------------------|------------------|--|--------------------|-------------------------|-------------------|
| a. Opportunity to supervise                 | 1<br>19               | 2<br>31          | 3<br>34                                  | 4<br>9             | 5<br>2                  | 6<br>7            |
| b. Obtaining new skills, expertise          | 1<br>17               | 2<br>40          | 3<br>32                                  | 4<br>4             | 5<br>1                  | 6<br>8            |
| c. Assignment title (EIC, SS, etc.)         | 1<br>19               | 2<br>25          | 3<br>40                                  | 4<br>6             | 5<br>4                  | 6<br>7            |
| d. Using your skills, expertise             | 1<br>27               | 2<br>47          | 3<br>17                                  | 4<br>3             | 5<br>2                  | 6<br>6            |
| e. Traveling                                | 1<br>14               | 2<br>17          | 3<br>59                                  | 4<br>2             | 5<br>4                  | 6<br>7            |
| f. Supervisor or manager to whom you report | 1<br>16               | 2<br>27          | 3<br>38                                  | 4<br>7             | 5<br>6                  | 6<br>8            |
| g. Co-workers and subordinates              | 1<br>7                | 2<br>19          | 3<br>56                                  | 4<br>4             | 5<br>6                  | 6<br>8            |
| h. Other (please specify):                  | 1                     | 2                | 3  | 4                  | 5                       | 6                 |
| <u>Office needs</u>                         | 1                     | -                | -  | -                  | -                       | -                 |
| <u>Personal preference</u>                  | 1                     | 2                | -  | -                  | -                       | -                 |

10. If you are assigned a job which you would prefer not to do, do you believe you can discuss your concerns with the person making the assignment without fear of negative repercussions? (Check one)

|           |            |
|-----------|------------|
| <u>89</u> | Yes        |
| <u>50</u> | No         |
| <u>21</u> | Don't Know |

11. Over the past two years, have prospective assignments in terms of roles, general nature of the work and travel requirements been fairly and accurately presented to you. (Check one of each category)

|           |                |              |                     | No  |
|-----------|----------------|--------------|---------------------|-----|
|           |                |              |                     | Ans |
| a) roles  | <u>117</u> YFS | <u>35</u> NO | <u>5</u> DON'T KNOW | 4   |
| b) work   | <u>127</u> YFS | <u>24</u> NO | <u>7</u> DON'T KNOW | 4   |
| c) travel | <u>128</u> YES | <u>21</u> NO | <u>9</u> DON'T KNOW | 4   |

If not, briefly explain

|  |    |
|--|----|
| Assignment not adequately explained        | 15 |
| Role and scope change after staff assigned | 12 |
| Given responsibility without title         | 2  |

12. Based on your experience over the last two years, please indicate your overall level of satisfaction with the assignments you have received. (Circle one)

| Very<br>dissatisfied | Moderately<br>dissatisfied | Neither<br>satisfied nor<br>dissatisfied | Moderately<br>satisfied | Very<br>satisfied |
|----------------------|----------------------------|--|-------------------------|-------------------|
| 1                    | 2                          | 3  | 4                       | 5                 |
| 10                   | 22                         | 17                                       | 62                      | 50                |

13. If you circled 1 or 2 in question 12, briefly explain why you were dissatisfied.

|  |    |
|--|----|
| Assignments had no developmental opportunities | 19 |
| Unhappy with supervision received              | 4  |
| No recognition for undesirable jobs            | 3  |

14. Over the last two years, have you requested feedback from management as to why you were or were not assigned to a particular assignment? (Circle one)

| YES | NO  |
|-----|-----|
| 1   | 2   |
| 32  | 129 |

15. If no to question 14, go to question 17.  
If yes to question 14, did you receive the feedback you requested? (Circle one)

| YES | NO |
|-----|----|
| 1   | 2  |
| 27  | 5  |

16. If no to question 15, go to question 17.  
 If yes to question 15, overall how satisfied were you with it? (Circle one)

| Very<br>dissatisfied | Moderately<br>dissatisfied | Neither<br>satisfied nor<br>dissatisfied | Moderately<br>satisfied | Very<br>satisfied |
|----------------------|----------------------------|--|-------------------------|-------------------|
| 1                    | 2                          | 3  | 4                       | 5                 |
| 3                    | 4                          | 5  | 7                       | 6                 |

17. How important do you believe job assignments are in the promotion process? (Circle one)

| little or no<br>importance | somewhat<br>important | moderately<br>important | very<br>important | very great<br>importance |
|----------------------------|-----------------------|-------------------------|-------------------|--------------------------|
| 1                          | 2                     | 3                       | 4                 | 5                        |
| 5                          | 11                    | 18                      | 67                | 59                       |

18. Are there assignments in your region/division which you believe provide individuals assigned to them a substantial advantage in the promotion process? (Check one)

128 YES. 16 NO 13 DON'T KNOW

19. If no go to question 21.  
 If yes, to question 18, do you believe these jobs are fairly assigned to staff? (Check one)

27 YES 46 NO 53 DON'T KNOW

20. If your prior performance ratings were generally "fully successful" what do you think your chances would be to be assigned to such a job?

| little or<br>none | less than<br>average | average | above<br>average | very<br>great | don't<br>know |
|-------------------|----------------------|---------|------------------|---------------|---------------|
| 1                 | 2                    | 3       | 4                | 5             | 6             |
| 19                | 45                   | 41      | 6                | 1             |               |



21. Based on your observations are start dates for assignments ever changed to allow certain staff to be assigned?  
(Check one)

77 YES    18 NO    65 DON'T KNOW

22. At your region/division level, what, if anything, would you change about the job assignment process and related policies?

|  |    |
|--|----|
| --Better communication of assignment information | 21 |
| --Develop clear written policy and procedures    | 18 |
| --More staff input into process(preferences)     | 16 |
| --Provide more developmental opportunities       | 14 |
| --Uniform assignment/rotation policy             | 13 |
| --More consideration given to KSAs               | 12 |
| --Provide better feedback on staffing decisions  | 7  |
| --Build honesty and credibility into the process | 5  |

23. On a GAO-wide basis, what if anything, would you change about the job assignment process and related policies?

|  |    |
|--|----|
| --Place more emphasis on developmental needs, staff capabilities, and job requirements | 19 |
| --Establish written uniform job assignment policies                                    | 11 |
| --More rotations at Headquarters   | 8  |
| --Allow staff to compete for assignments   | 8  |
| --Be more selective in jobs to be done   | 6  |

In addition to the above, 6 respondents expressed dissatisfaction with the stated roles and responsibilities of GS 13/14 level staff.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

*Memorandum*

10 FEB 1986

TO : Comptroller General

THRU : Assistant Comptroller General for Operations - Frank Fee  
Director, Affirmative Action Plans - Lowell Dodge

FROM : Advisory Council on Civil Rights, (ACCR)  
Management Committee - Council Chair, Jane Trahan *JT*  
Vice Chair, Charlie Daniel *CD*  
Secretary, Yolanda Garcia

SUBJECT: ACCR's Review of GAO's Affirmative Action Goals

During 1985, ACCR representatives advised Messrs. Socolar, Fee, Ahart, and Silva of the council's plans to perform a review to determine:

- How GAO develops and formulates its affirmative action plan and whether the plan is adequate?
- How successful is GAO in achieving its affirmative action goals?
- What major problems GAO management encounters in meeting affirmative action goals?

Currently, we are preparing the council's 1985 annual report which contains a summary of the subject review and our recommendations. (See attachment).

We need to update our report in view of GAO's recently issued Fiscal Year (FY) 1986 Affirmative Action Plan, a copy of which Mr. Lowell Dodge delivered to Mrs. Jane Trahan on January 24, 1986. We regret that, unlike in the past, we were not given the opportunity to comment on a draft of the Affirmative Action Plan before the plan was issued. Since there is no comment period, per se, we are not providing detailed comments on the FY 1986 plan at this time. We reserve the right for the council to further comment on the plan during calendar year 1986.

However, at this time we wish to update our report. This memorandum will serve as a partial update by our acknowledging that, through the FY 1986 plan, GAO has provided a framework for making managers accountable for achieving affirmative action goals.

The need for accountability is the central theme of our recommendations. In general, the framework provided by the plan represents only the initial step toward achieving the recommendations we are making. Those recommendations, contained in our summary, are as follows:

- °We believe unit specific promotion goals should be established because it seems to be the most logical way for coordinating efforts to achieve agency-wide goals.
- °We believe unit specific hiring and promotion goals should be incorporated into SES Contracts. We believe such action would assure proper attention to affirmative action goals.
- °We believe the extent that affirmative action goals are achieved should be factored into SES bonus determinations, i.e. pay-for-performance. We recognize that certain factors and/or impediments may arise which might prevent achieving affirmative action goals. These factors and/or impediments should be reviewed to determine how significant a role they played in preventing goal achievement. This decision or conclusion should be a factor in the final bonus determination.

Although we have no detailed comments on the plan at this time, we would like to further update our report with a response from GAO to our immediate questions regarding the plan:

- What are the target dates for GAO units to complete utilization and availability analyzes for women and minorities and to establish goals and timeframes?
- The plan (p. 2) states that Division Directors, Regional Managers, and heads of other units will report periodically to the Assistant Comptroller General for Operations. Have more specific reporting requirements been established (e.g. What are the reports to contain? Are the reports to be prepared quarterly, monthly, etc. or after a particular action)? If specific requirements have not been established, are there plans for doing this?

- Is there a specific target date when GAO will begin to include in all SES Contracts (1) goals and timetables for hiring and promotion or (2) a reference incorporating the goals and timetables?
- What criteria will be used to measure "outstanding achievement" and "unsatisfactory performance" when assessing performance in meeting affirmative action goals and timetables? When will GAO begin to use this criteria for assessing performance?
- Are there any GAO-wide responsibilities for trying to achieve affirmative action goals (e.g. will the Office of Personnel or each individual unit be responsible for recruiting)? If so, what are they and who are the responsible officials?
- Will future GAO affirmative action plans include more specific data such as, affirmative action goals, other objectives, target dates, and names of responsible officials?

We look forward to your response so that it may also be included in our annual report. We anticipate sending our draft annual report to the CG's Office for review and comment in March 1986. In addition to affirmative action goals, the report will include the results of our work in several other areas, including job assignments. If you have any questions please contact Jane Trahan on 275-4155.

Attachment

cc: Special Assistant to the  
Comptroller General  
Assistant Comptroller General  
for Human Resources  
Director, Civil Rights

