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Report to the Chairman, Committee on Foreign Relations, U.S. Senate

July 2022

STATE DEPARTMENT

Additional Actions Needed to Improve Workplace Diversity and Inclusion

Accessible Version

GAO-22-105182

GAO Highlights

Highlights of GAO-22-105182, a report to the Chairman, Committee on Foreign Relations, U.S. Senate

July 2022

STATE DEPARTMENT

Additional Actions Needed to Improve Workplace Diversity and Inclusion

Why GAO Did This Study

State leaders have highlighted the importance of fostering an inclusive workforce that reflects the diversity of the U.S. State has made efforts to increase DEIA. However, in January 2020, GAO found that State continued to face longstanding diversity issues. These included underrepresentation of historically disadvantaged racial or ethnic groups and women in the senior ranks. Federal guidance requires State to systematically identify, assess, and remove barriers to equal participation in its workforce and to report on such barriers annually.

GAO was asked to review issues related to State's DEIA efforts. This report examines (1) the extent to which State's actions address leading practices for managing diversity and inclusion in the workplace, and (2) the extent to which State has taken steps to identify, investigate, and eliminate barriers to workforce diversity since January 2020. GAO reviewed State documents, surveyed 20 employee organizations, and interviewed State officials. GAO compared State's actions to leading practices, and analyzed State's methodologies for identifying potential barriers.

What GAO Recommends

GAO is recommending that State establish performance measures, enhance accountability for workplace DEIA goals, create a plan to improve its barrier analysis process, and improve its statistical methodology. State concurred with these recommendations.

View GAO-22-105182. For more information, contact Jason Bair at (202) 512-6881 or bairj@gao.gov.

What GAO Found

The Department of State's actions address five of seven leading practices GAO identified for managing diversity and inclusion in the workplace; however, gaps remain in measurement and accountability (see table). State is addressing employee involvement and diversity training and has plans to help address gaps in leadership commitment, recruitment, and succession planning. GAO's survey of State employee organizations reinforced these findings, with the majority of respondents having favorable views of senior leadership commitment to diversity, equity, inclusion, and accessibility (DEIA). However, State does not have performance measures and has not taken sufficient actions to enhance accountability for its workplace DEIA goals. Moreover, around 70 percent of the organizations GAO surveyed indicated that State does not hold managers and supervisors accountable for their progress toward achieving diversity and inclusion goals. Without ways to measure progress and enhance accountability, State may not achieve its goal of fostering a diverse and inclusive workplace.

GAO's Assessment of Department of State's Actions Compared to Leading Practices for Diversity and Inclusion Management

Leading Practice	GAO Rating
Employee Involvement	Address
Diversity Training	Address
Leadership Commitment	Generally address
Recruitment	Generally address
Succession Planning	Generally address
Measurement	Partially address
Accountability	Partially address

Legend: ●—Address. ◑—Generally address. ◔—Partially address. ○—Do not address.

Source: GAO analysis of Department of State actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

State has taken steps to identify, investigate, and eliminate barriers to workforce diversity, though its analyses vary in depth and have methodological weaknesses. Since January 2020, State has identified four indicators of potential barriers to diversity, including lower promotion rates above the GS-13 level for historically disadvantaged racial or ethnic groups compared to Whites. State has taken some steps to investigate and eliminate barriers, but GAO found that State's analyses vary in depth. For example, State did not assess why fewer women take the Foreign Service Officer test before implementing measures designed to improve recruitment of women. Having not investigated the cause of the disparity, State cannot be sure its response addresses the underlying barrier. In addition, GAO found weaknesses in State's statistical methodology. For example, State's analysis only allowed it to identify extreme disparities as indicators of potential barriers in Foreign Service promotions. If State does not create a plan to improve its barrier analysis process and improve its methodology for identifying potential barriers, it risks using resources on solutions that do not address the root causes of disparities and risks leaving barriers unaddressed.

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Abbreviations

CDIO	Chief Diversity and Inclusion Officer
DEIA	diversity, equity, inclusion, and accessibility
EAG	employee affinity group
EEOC	U.S. Equal Employment Opportunity Commission
GS	General Schedule
MD-715	Management Directive 715
OPM	Office of Personnel Management
S/ODI	Office of Diversity and Inclusion
STEM	science, technology, engineering, and mathematics

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE
441 G St. N.W.
Washington, DC 20548

July 21, 2022

The Honorable Robert Menendez
Chairman
Committee on Foreign Relations
United States Senate

Dear Mr. Chairman:

For years, Department of State leaders have highlighted the importance of fostering an inclusive workforce that reflects the diversity of the United States. In addition to efforts to increase representation of diverse groups in its workforce, State has also worked to improve equity, inclusion, and accessibility in its workplace.[1] However, in January 2020, we reported that State continued to face longstanding diversity problems, such as underrepresentation of historically disadvantaged racial or ethnic groups and women in the senior ranks.[2] We recommended that State take additional steps to identify diversity issues that could indicate potential barriers to equal opportunity in its workforce, as discussed later in the report.

In April 2021, the Secretary of State named the department's first standalone Chief Diversity and Inclusion Officer (CDIO) and reiterated the administration's policy to prioritize diversity, equity, inclusion, and

[1]Consistent with Executive Order 14035, we define diversity as the practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities; equity as the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment; inclusion as the recognition, appreciation, and use of the talents and skills of employees of all backgrounds; and accessibility as the design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them. Exec. Order. No. 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86 Fed. Reg. 34593 (June 25, 2021).

[2]In this report, historically disadvantaged racial or ethnic groups include employees who identify as neither non-Hispanic White nor unspecified. See GAO, *State Department: Additional Steps Are Needed to Identify Potential Barriers to Diversity*, GAO-20-237 (Washington, D.C.: Jan. 27, 2020).

accessibility (DEIA) as a national security imperative.[3] In June 2021, the administration established a government-wide initiative to advance DEIA across the federal workforce. Specifically, Executive Order 14035 directs agencies to assess the state of their DEIA efforts and develop strategic plans to advance DEIA in their workforces, among other things.[4]

You asked us to review State's DEIA efforts. This report examines (1) the extent to which State's actions address leading practices for managing diversity and inclusion in the workplace and (2) the extent to which State has taken steps to identify, investigate, and eliminate barriers to workforce diversity since January 2020, when we issued our last report on State's workforce diversity.[5]

To examine the extent to which State's actions address leading practices for managing diversity and inclusion in the workplace, we compared State's department-wide actions to seven leading practices we identified for managing workplace diversity and inclusion.[6] We assessed the extent to which actions addressed these leading practices, but we did not assess the quality of implementation or effectiveness of these actions. We also selected and surveyed employee organizations to gather their perspectives on State's DEIA efforts. Specifically, we sent a questionnaire to 21 of State's 29 employee organizations whose interests we

[3]Previously, the Director for State's Office of Civil Rights served as the department's Chief Diversity Officer.

[4]*Exec. Order No. 14035, Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86 Fed. Reg. 34593 (June 25, 2021).

[5]GAO-20-237.

[6]GAO, *Diversity Management: Expert-Identified Practices and Agency Examples*, GAO-05-90 (Washington, D.C.: Jan. 14, 2005). In 2005, we reported on nine leading practices that we developed. For this review, we assessed whether State's actions were consistent with seven of the nine leading practices. We did not assess State's actions against the "Performance" leading practice because we determined that other leading practices encompassed performance. We also did not assess State's actions against the "Strategic Planning" leading practice because State was updating its DEIA plan during our review. We determined that "Diversity Management" in GAO-05-90 sufficiently encompasses "Inclusion."

determined were directly related to DEIA, and received responses from 20 of the organizations.[7]

To examine the extent to which State has taken steps to identify, investigate, and remove barriers to diversity since January 2020, we compared the department-level steps State has taken to implement U.S. Equal Employment Opportunity Commission (EEOC) guidance on barrier analysis as well as the internal control principle regarding using quality information.[8] We also evaluated how State conducted its barrier analyses and whether the statistical methodology State used was sufficiently reliable to identify potential barriers to workforce diversity. We did not assess the reliability of the data State used in its analyses.

In addition, we interviewed officials from State, EEOC, the Office of Personnel Management (OPM), and unions representing State's Civil and Foreign Service employees. Appendix I provides additional details of our overall scope and methodology.[9]

We conducted this performance audit from April 2021 to July 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

[7]We sent surveys to 21 State employee organizations, including those representing racial or ethnic heritage (e.g., the South Asian-American Employee Association); abilities (e.g., the Disability Action Group); sexual orientation and gender identity (e.g., Gays and Lesbians in Foreign Affairs Agencies); religions (e.g., Jewish Americans and Friends in Foreign Affairs); marital status (e.g., Singles at State); and veteran status (e.g., Veterans at State), among others. For a full list of employee organizations, see appendix I.

[8]EEOC, *Equal Employment Opportunity Management Directive 715*, MD-715 (2003).

[9]See app. II for additional information on our leading practices assessment. See app. III for the employee organization survey questions and results. See app. IV for more detail on our analysis of State's methodology for identifying potential barriers to diversity.

Background

Requirements and Guidance Related to Federal Workforce DEIA

Under federal law, all federal personnel decisions must be made without discrimination on the basis of race; color; national origin; religion; sex (including sexual orientation, gender identity, and pregnancy); age (40 or older); disability; or genetic information; and without reprisal, and agencies must establish a program of equal employment opportunity for all federal employees and applicants.[10] By law, the federal government's recruitment policies should endeavor to achieve a workforce from all segments of society, while avoiding discrimination for or against any employee or applicant on the basis of race; color; religion; sex (including sexual orientation, gender identity, and pregnancy); national origin; age (40 or older); disability; genetic information; or any other prohibited basis.[11]

Federal law, regulations, executive orders, and management directives include provisions aimed at improving federal employment opportunities for persons with disabilities. By law, federal agencies are required to take steps to provide equal opportunity to qualified individuals with disabilities in all aspects of federal employment.[12] Further, federal agencies are required to develop affirmative action program plans for hiring, placement, and advancement of people with disabilities, and ensure employment

[10]Title VII of the Civil Rights Act of 1964, Pub. L. No. 88-352, 78 Stat. 253-266 (July 2, 1964), as amended, codified at 42 U.S.C. § 2000e et seq.; Section 501 of the Rehabilitation Act of 1973, Pub. L. No. 93-112, 87 Stat. 390 (Sept. 26, 1973), as amended, codified at 29 U.S.C. § 791; Section 15 of the Age Discrimination in Employment Act of 1967, Pub. L. No. 90–202 (Dec. 15, 1967), as added by Pub. L. No. 93–259, § 28(b)(2), 88 Stat. 74 (Apr. 8, 1974), codified at 29 U.S.C. § 633a; and Title II of the Genetic Information Nondiscrimination Act of 2008, Pub. L. No. 110-233, 122 Stat. 881-920 (May 21, 2008), codified at 42 U.S.C. § 2000ff et seq.

[11]See, for example, 5 U.S.C. §§ 2301(b)(1) and 2302(b).

[12]29 U.S.C. § 791.

nondiscrimination and the provision of reasonable accommodations.[13] EEOC regulations also require agencies to take specific steps to increase the employment of individuals with disabilities or targeted disabilities until the agency meets established goals.[14]

Issued in August 2011, Executive Order 13583 directs all executive departments and agencies to develop and implement a more comprehensive, integrated, and strategic focus on diversity and inclusion as a key component of their respective human resources strategies. Further, this approach should include a continuing effort to identify and adopt best practices to promote diversity and to remove any barriers to equal employment opportunity, consistent with merit system principles and applicable law.[15]

Issued in June 2021, Executive Order 14035 expands on Executive Order 13583 and related directives. Specifically, the order establishes DEIA as priorities for the administration and establishes additional procedures to advance these priorities in the federal workforce. The order directs agencies to develop DEIA strategic plans, provide resources to implement their strategic plans, and report annually on progress, among other things. For more details on the order's requirements, see app. V.

Barrier Analysis Process

According to EEOC, to attract, develop, and retain a top-quality workforce, agencies must ensure that their workforces are free of barriers to equal employment opportunity.[16] EEOC's Management Directive 715 (MD-715) guidance tasks agencies with eliminating barriers that impede

[13]For regulations implementing the nondiscrimination and reasonable accommodation obligations under section 501 of the Rehabilitation Act, see part 1630 of title 29 of the Code of Federal Regulations. For regulations implementing the affirmative action program plan requirements of section 501 of the Rehabilitation Act, see section 1614.203 of title 29 of the Code of Federal Regulations. See also Exec. Order No. 13164, *Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation*, 65 Fed. Reg. 46565 (July 26, 2000).

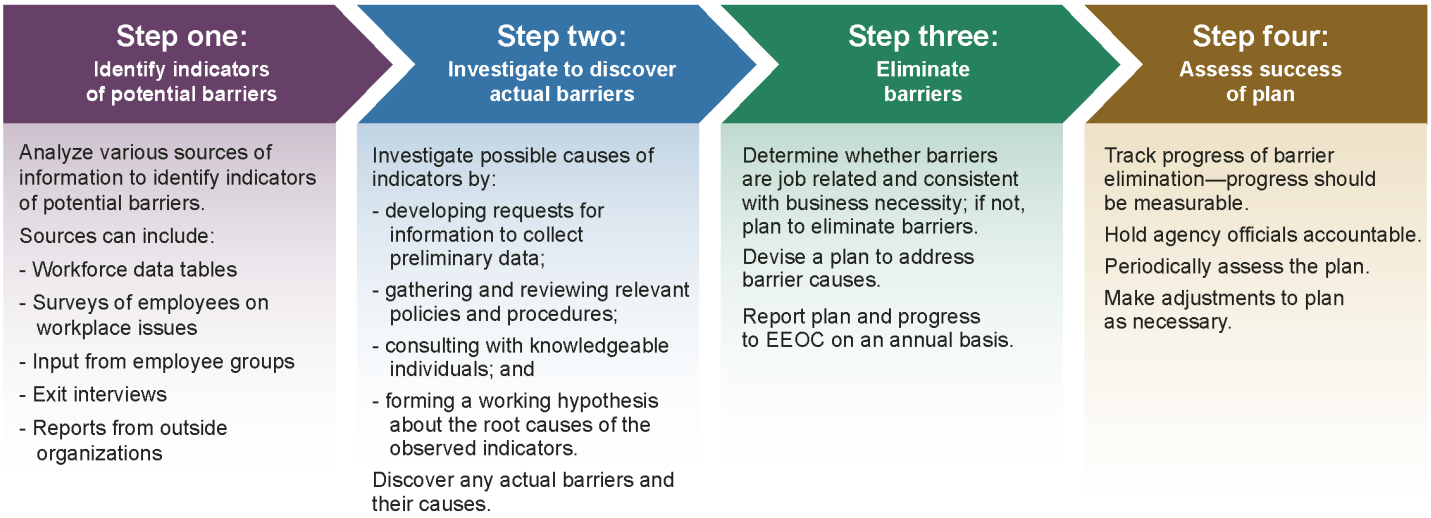
[14]See, for example, 29 C.F.R. § 1614.203(d)(7).

[15]Exec. Order No. 13583, *Establishing a Coordinated Government-Wide Initiative to Promote Diversity and Inclusion in the Federal Workforce,* 76 Fed. Reg. 52847 (Aug. 23, 2011).

[16]EEOC defines a barrier as an agency policy, principle, practice, or condition that limits or tends to limit employment opportunities for members of a particular group based on their sex, race, or ethnic background, or disability status.

free and open competition in the workplace and prevent members of any equal employment opportunity group (applicants and employees) from realizing their full potential. At least annually, federal agencies are to monitor progress, identify areas where barriers may exclude certain groups, and develop strategic plans to eliminate identified barriers. As shown in figure 1, EEOC's guidance outlines a four-step process for federal agencies to identify and eliminate barriers to their workforce diversity, which is commonly referred to as the barrier analysis process.

Figure 1: Equal Employment Opportunity Commission's (EEOC) Management Directive 715 Barrier Analysis Process



Source: GAO analysis of Equal Employment Opportunity Commission (EEOC) guidance. | GAO-22-105182

Note: Indicators of potential barriers—which EEOC refers to as "triggers"—are trends, disparities, or anomalies that suggest the need for further inquiry into a particular policy, practice, procedure, or condition. EEOC defines a barrier as an agency policy, principle, or practice that limits or tends to limit employment opportunities for members of a particular group based on their sex, race, ethnic background, or disability status.

As figure 1 shows, the first step of the process calls for agencies to analyze various sources to identify trends, disparities, or anomalies, which this report collectively refers to as indicators of potential barriers. Indicators of potential barriers suggest the need for further inquiry into a particular policy, practice, procedure, or condition.[17] As stated in the guidance, agencies are not required to compile workforce data simply to produce a report to EEOC, but rather, each agency's attention should be

[17]EEOC guidance refers to such indicators of potential barriers as "triggers."

devoted to what the compiled data reveals about the agency and its workforce.

The second step of the process calls for agencies to investigate any such indicators of potential barriers to discover actual barriers and their causes. According to EEOC's guidance on barrier identification and elimination, agencies are required to move beyond treating the symptom (i.e., workforce demographics) to eliminate the underlying barrier, or cause of the symptom (i.e., failure to accommodate or lack of career development opportunities). Additionally, the guidance states that while workforce data are useful as an initial diagnostic tool, they should not be the only information sources agencies use to help identify barriers.

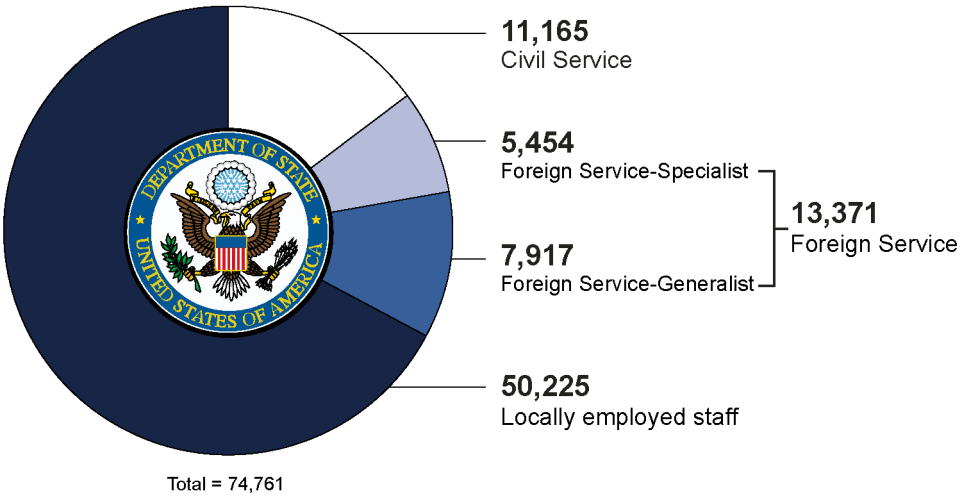
The third step is to develop and implement a plan to eliminate barriers that includes corresponding action items, responsible personnel, and target dates.[18] Agencies should report the plan and progress annually to EEOC. The fourth step is to assess the success of plans to eliminate barriers.

State's Workforce

State reported that it had 74,761 direct-hire employees as of December 31, 2021, including 11,165 full-time permanent Civil Service personnel, 13,371 full-time permanent Foreign Service personnel, and 50,225 Locally Employed staff, as shown in figure 2.

[18]EEOC guidance states that agencies should aim to eliminate all barriers that are not job-related and consistent with business necessity since some jobs may require knowledge, skills, and abilities that are necessary for the performance of essential job functions. A medical degree and license are examples of job-related qualifications for a physician position, whereas the ability to proficiently use a firearm for administrative employees of a law enforcement agency may be an example of an unnecessary barrier, according to EEOC. However, even if an agency determines that a test, job qualification, or selection criterion is job-related and consistent with business necessity, the agency should nonetheless determine whether there are alternatives to the selection criterion or how a skill set can be demonstrated such that the negative effect on a particular group is reduced. If alternatives are not available, the practice may be continued.

Figure 2: Department of State's Workforce by Employee Type, as of December 31, 2021



Source: Department of State Global Talent Management Fact Sheet. | GAO-22-105182

Accessible Data for Figure 2: Department of State's Workforce by Employee Type, as of December 31, 2021

Category	Number of staff
Civil Service	11,165
Foreign Service - Generalist	5,454
Foreign Service - Specialist	7,917
Foreign Service – Specialist and Generalist combined	13,371
Locally Employed Staff	50,225
Total	74,761

Civil Service employees serve domestically in professional, technical, administrative, and clerical positions; help formulate and implement U.S. foreign policy; provide strategic and logistical support to U.S. diplomatic missions; and issue passports and travel warnings, among other functions. Most Civil Service employees are on the General Schedule

(GS) classification system, which has 15 ranks ranging from GS-1 (lowest) to GS-15 (highest), followed by the executive ranks.[19]

Foreign Service employees serve as either generalists or specialists. Foreign Service generalists, known as officers, help formulate and implement U.S. foreign policy and are assigned to work in one of five career tracks: consular, economic, management, political, or public diplomacy. Foreign Service specialists support and maintain the functioning of overseas posts and serve in 25 different skill groups, filling positions such as security officer or information management specialist. Foreign Service Officers enter at class (i.e., pay grade) 6, 5, or 4, depending on education and experience. Employees can be promoted up to class 1, after which they can apply for executive rank.

Locally Employed staff serve alongside Foreign Service employees at overseas posts and perform mission program and support functions. Posts rely heavily on Locally Employed staff to provide institutional knowledge and continuity, and they are frequently assigned significant management roles and program functions. Locally Employed staff include foreign nationals and U.S. citizen residents employed via direct hire appointments, personal services agreements, or personal services contracts, according to State guidance. This workforce is regulated by department policies and local labor laws, which vary by country.

Key State DEIA Stakeholders

State's Office of Diversity and Inclusion (S/ODI), Office of Civil Rights, and Bureau of Global Talent Management implement department-wide initiatives to promote DEIA.

- **Office of Diversity and Inclusion.** According to State, S/ODI's goal is to advance national security by building a State Department that represents America's diversity. Reporting to the Secretary of State, the CDIO leads the office, which is developing and implementing the department's 5-year DEIA Strategic Plan. State established S/ODI in June 2021 with plans to hire 12 U.S. direct hire full-time staff, including the CDIO. As of May 2022, S/ODI had 10 staff and was in the process filling the two remaining positions and identifying additional needs.

[19]The Civil Service workforce includes small subsets of employees on other pay scales, such as the General Government and Wage Grade systems.

- **Office of Civil Rights.** According to State, the mission of the office is to propagate fairness, equity, and inclusion at the department. The office reports to the Secretary of State, and manages the department's equal employment opportunity program and provides outreach and training aimed at preventing employment discrimination. In addition, the office works with relevant bureaus to gather and analyze necessary data and information to complete the MD-715 report and submits it to EEOC.
- **Bureau of Global Talent Management.** According to State, the mission of the bureau is to recruit, develop, and empower its workforce to advance U.S. foreign policy goals. The bureau's priority goals include cultivating DEIA across the department. The bureau reports to the Undersecretary for Management and leads the department's recruitment, assignment, and career development processes.

State's Actions Address or Generally Address Five Diversity and Inclusion Leading Practices, but Gaps Remain in Measurement and Accountability

We assessed the extent to which State's actions address seven leading practices for diversity and inclusion management we previously identified.[20] Specifically, we found that State's actions

- address employee involvement and diversity training;
- generally address leadership commitment, recruitment, and succession planning; and
- partially address measurement and accountability.

See table 1 for our overall assessment of State's actions compared to leading practices. For additional information on our leading practices assessment, see app. II.

[20]GAO-05-90.

Table 1: GAO's Assessment of Department of State's Actions Compared to Leading Practices for Diversity and Inclusion Management

Leading practice	Definition	GAO overall rating
Employee involvement	The contribution of employees in driving diversity throughout an organization	Address
Diversity training	Organizational efforts to inform and educate management and staff about diversity	Address
Leadership commitment	A vision of diversity demonstrated and communicated throughout an organization by top-level management	Generally address
Recruitment	The process of attracting a supply of qualified, diverse applicants	Generally address
Succession planning	An ongoing, strategic process for identifying and developing a diverse pool of future leaders	Generally address
Measurement	A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program	Partially address
Accountability	The means to ensure that leaders are responsible for diversity by linking their performance assessment to the progress of diversity initiatives	Partially address

Legend: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed.

Source: GAO analysis of Department of State actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

State Is Addressing Employee Involvement

We determined that State's actions address the employee involvement leading practice, as shown in table 2.

Table 2: GAO's Assessment of Department of State's Actions Compared to Employee Involvement Leading Practice for Diversity and Inclusion Management

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Employee involvement: The contribution of employees in driving diversity throughout an organization.	Address	Employee resource groups or affinity groups	Address
Employee involvement: The contribution of employees in driving diversity throughout an organization.	Address	Diversity and inclusion advisory council	Address
Employee involvement: The contribution of employees in driving diversity throughout an organization.	Address	Encouragement of employee community outreach and involvement	Address

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Employee involvement: The contribution of employees in driving diversity throughout an organization.	Address	Mentoring and networking programs to develop and retain diverse personnel	Address

Legend: For the overall rating: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed. For the step rating: ●—Address. ◑—Partially address. ○—Do not address.

Source: GAO analysis of State Department actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

In particular, State has

- **Employee organizations.** State has employee organizations that represent DEIA interests of Civil and Foreign Service and Locally Employed staff across the department to management, according to State policy and officials. Examples include Arab-Americans in Foreign Affairs Agencies, Balancing Act at State: Achieving Work-Life Balance, the Disability Action Group, Jewish Americans and Friends in Foreign Affairs, Gays and Lesbians in Foreign Affairs Agencies, and Veterans at State.[21] Employee organization representatives meet with senior leaders in a quarterly Diversity Forum to discuss DEIA issues.
- **Diversity and Inclusion Leadership Council.** In July 2021, State convened a Diversity and Inclusion Leadership Council, comprising the deputy assistant secretaries from each bureau and bureau DEIA Senior Advisors, which meets quarterly. Other councils advise State leaders on DEIA initiatives, including the Civil Service Talent Advisory Council and Locally Employed Staff Advocacy Council.
- **Community Outreach and Involvement.** State has two programs that encourage employees to reach out to their communities and hometowns. Specifically, the Volunteer Recruiter Corps offers Civil and Foreign Service employees the opportunity to recruit at career fairs and correspond with prospective candidates. In addition, the Hometown Diplomats Program allows Civil and Foreign Service employees to speak with local organizations, media, schools, and government officials during scheduled trips to their hometowns. Both programs seek to attract diverse talent and increase the diversity of State's workforce as part of the department's recruitment efforts.
- **Mentoring and Networking Programs.** State maintains several mentoring programs that target a diverse range of personnel. In particular, State officials said that they collaborate with employee

[21]For a full list of employee organizations, see app. I.

organizations and bureaus' and posts' diversity and inclusion councils to promote mentoring opportunities. In addition, department officials stated that they recently began tracking demographic information for State's Civil and Foreign Service mentoring program to monitor participant diversity. State officials said that they are aware that employees from historically disadvantaged groups may face specific challenges that a mentor may help address, so officials try to match participants on the basis of race and ethnicity, sexual orientation and gender identity, and disability status, upon request.

State Is Addressing Diversity Training

We determined that State is addressing the diversity training leading practice, as shown in table 3.

Table 3: GAO's Assessment of Department of State's Actions Compared to Diversity Training Leading Practice for Diversity and Inclusion Management

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Diversity training: Organizational efforts to inform and educate management and staff about diversity.	Address	Specialized diversity and inclusion education and training	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.	Address	Diversity training for employees	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.	Address	Diversity training for hiring and promotion panel participants	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.	Address	Diversity training for senior leaders	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.	Address	Team building, communication, decision-making, and conflict resolution training	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.	Address	Effectiveness assessment of diversity training	Address

Legend: For the overall rating: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed. For the step rating: ◖—Address. ➲—Partially address. ◗—Do not address.

Source: GAO analysis of State Department actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

Specifically, State offers

- **Specialized diversity and inclusion training for a range of staff.** State offers several types of specialized diversity and inclusion training, including on antiharassment, antidiscrimination, unconscious bias, and equal employment opportunity and diversity awareness. State makes this training available for all Civil and Foreign Service employees, Locally Employed staff, and contractors. State requires employees to take certain courses depending on their level and role. Specifically, State requires certain training for Civil and Foreign Service hiring and promotion panel participants, including unconscious bias and equal employment opportunity and diversity

awareness training, according to State policy and officials. In addition, unconscious bias training is a prerequisite for all State leadership courses, which are mandatory for mid and senior-level personnel in the Civil and Foreign Service.

- **Team building, communication, decision-making, and conflict resolution training.** Most of State's training incorporates elements of team-building, communication, decision-making, or conflict resolution skills, according to officials. Under the diversity training leading practice, these are important skills to increase employees' effectiveness in a diverse environment. For example, State offers leadership courses that aim to develop skills such as team building, active listening, decision-making and judgment, and conflict management.
- **Effectiveness assessment of diversity training.** According to officials, State relies on course survey feedback to assess the effectiveness of its DEIA training. In addition, State is conducting a training needs assessment in 2022 to provide an overview of State's DEIA training and identify gaps. State plans to use the results to establish next steps for DEIA training, such as developing courses on bystander intervention or managing a diverse workforce. In addition, this assessment could help State build DEIA into its entire training curriculum.

State Is Generally Addressing Leadership Commitment and Has Plans to Address Gaps

We found that State's actions generally address the leadership commitment leading practice, as shown in table 4. State also has plans to help strengthen commitment at all levels throughout the department and address additional policy gaps.

Table 4: GAO's Assessment of the State Department's Actions Compared to the Leadership Commitment Leading Practice for Diversity and Inclusion Management

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Leadership commitment: A vision of diversity demonstrated and communicated throughout an organization by top-level management.	Generally address	New or amended policies	Partially address
Leadership commitment: A vision of diversity demonstrated and communicated throughout an organization by top-level management.	Generally address	Policy statements, speeches, and plans	Address
Leadership commitment: A vision of diversity demonstrated and communicated throughout an organization by top-level management.	Generally address	Posts, statements, and information on the internal and external website	Address
Leadership commitment: A vision of diversity demonstrated and communicated throughout an organization by top-level management.	Generally address	Senior leader to champion diversity and inclusion efforts	Address

Legend: For the overall rating: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed. For the step rating: ●—Address. ◔—Partially address. ○—Do not address.

Source: GAO analysis of State Department actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

Specifically, State has taken several actions that work to address leadership commitment, including

- **Establishing or amending policies.** State has established or amended policies related to DEIA, such as policies on workplace flexibilities and accessibility, and identified additional policy gaps that it has plans to address. For example, State officials reported having or amending policies on workplace flexibilities—such as leave without pay, remote work arrangements, and alternative work schedules—which could benefit employees, including those with familial responsibilities, medical conditions, or disabilities. In addition, the department provides assistance technology equipment to employees with disabilities, who are able to test and provide feedback on this equipment in the Access Center, which State opened in December 2020. State also has plans to develop additional policies, including those related to S/ODI, disability, and same-sex spouses.

- **Developing statements, speeches, and plans.** State has promoted its policies through various methods, including hosting open forums in 2018 and 2021 on harassment and sexual assault where employees could learn about the department's policies and procedures. State officials also testified before Congress to ask for support for paid internships to expand opportunities for students who may not have the financial means to support themselves during unpaid internships. In April 2022, the department announced a paid student internship program, which will launch in the fall. In addition, in March 2022, State officials said that they completed a DEIA Strategic Plan to outline the department's goals and actions to advance DEIA in the workplace, and submitted the plan to the White House Domestic Policy Council for clearance. State also has a strategic objective to build a diverse, inclusive, resilient, and dynamic workforce in the Joint Strategic Plan for fiscal years 2022-2026.[22]
- **Posting internal and external statements and information.** State has released a variety of information internally, including through its TalentCare initiative, which provides information on policies and programs that support employee well-being, and a series of communications called "Culture of Inclusion" that focuses on a range of DEIA issues and best practices. Externally, State has released press statements and social media posts, including for Pride Month, National Hispanic Heritage Month, and Black History Month, as seen in figure 3.

[22]U.S. Department of State and U.S. Agency for International Development, *Joint Strategic Plan FY2022-2026*, March 2022. Strategies to achieve this strategic objective include identifying and eliminating barriers to equity, implementing targeted recruitment and retention efforts, and establishing provisions for DEIA accountability.

Figure 3: Examples of Department of State's Social Media Demonstrating Leadership Commitment to Workplace Diversity and Inclusion

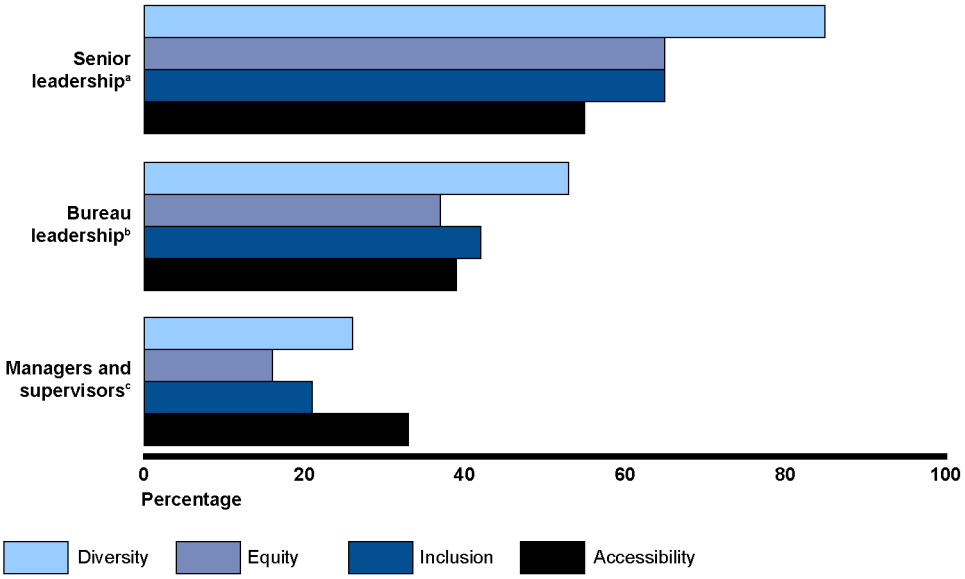
Source: Department of State Twitter account. | GAO-22-105182

- **Appointing senior leader(s) to champion diversity and inclusion.** In April 2021, the Secretary of State named the standalone CDIO to oversee the department's diversity and inclusion efforts. The CDIO reports directly to the Secretary of State and oversees S/ODI. The CDIO is also leading State's efforts to align and advance diversity and inclusion policies across the department in a transparent and accountable way.

In announcing the selection of the CDIO, the Secretary of State said that the goal was to incorporate diversity and inclusion into the department's work at every level. However, this will take time because leadership commitment varies within the department, according to State officials. The CDIO and union officials emphasized that commitment to DEIA varies at different leadership levels and that State's organizational culture must change in order to instill DEIA across the department. In addition, the State employee organizations we surveyed perceived declining

commitment to DEIA from senior leadership to bureau leadership to managers and supervisors. Specifically, 85 percent of respondents (17 of 20) stated that senior-level leadership demonstrates a great or very great commitment to diversity. In contrast, 26 percent (5 of 19) perceived the same level of commitment from managers and supervisors, as figure 4 shows.[23]

Figure 4: Percentage of Surveyed Employee Organizations Responding that Department of State Leadership Levels Demonstrate a Great or Very Great Commitment to Diversity, Equity, Inclusion, and Accessibility



Source: GAO analysis of survey of Department of State employee organizations. | GAO-22-105182

Accessible Data for Figure 4: Percentage of Surveyed Employee Organizations Responding that Department of State Leadership Levels Demonstrate a Great or Very Great Commitment to Diversity, Equity, Inclusion, and Accessibility

Category	Percentage (Senior leadership)	Percentage (Bureau leadership)	Percentage (Managers and supervisors)
Diversity	85	52.60	26.30
Equity	65	36.80	15.79
Inclusion	65	42	21
Accessibility	55	38.89	33.34

[23]For full survey results, see app. III.

Note: The percentages above do not include those employee organizations that responded with "no basis to judge," which ranges from zero to two organizations per question. See questions 1 through 4 in app. III for full results.

[a]Senior leadership refers to senior-level or political leadership, including the Secretary, Deputy Secretaries, Under Secretaries, and Ambassadors-at-large.

[b]Bureau leadership refers to Assistant Secretaries and Deputy Assistant Secretaries.

[c]Managers and supervisors refers to Managing Directors or Directors, Deputy Directors, and Team Leads or Unit Chiefs.

State officials told us that many mid-level managers are skeptical of State's ability to follow through on stated commitments to improve DEIA, given that similar efforts in the past have not created lasting change, and managers might not have the needed support from leadership. According to the CDIO, the Secretary of State is aware of staff's concerns about State's culture and ability to change, and both the CDIO and the Secretary are working to demonstrate commitment through policies, speeches, and support for S/ODI's efforts. For example, the Secretary of State stated that the Diversity and Inclusion Leadership Council is a way to incorporate leaders across the department's bureaus and teams into State's DEIA efforts. However, the CDIO explained that it will take time to build trust in State's commitment to DEIA values at all levels of the department. Moreover, S/ODI officials explained that mid-level managers need more support from the department's leadership, including policies and guidance to manage a diverse workforce. Although State officials discussed efforts to address some of these concerns, such as exploring DEIA training needs and helping employees take time away for career development activities, they acknowledged that State needs to provide more support to mid-level management.

In addition to strengthening commitment across the department and promoting existing policies, State has identified additional policy actions that could help further address the leadership commitment leading practice. In particular, State plans to

- **Establish S/ODI roles and responsibilities.** S/ODI officials said that they plan to establish the office's roles and responsibilities in State's policy manual or associated handbook; however, as of June 2022, they had not yet done so. According to S/ODI officials, the office is still delineating roles and responsibilities, as S/ODI assumed functions that the Bureau of Global Talent Management and Office of Civil Rights previously performed. S/ODI officials told us that they are identifying additional staff needed for their office, such as advisors to revise State policies and guidance.

- **Establish or amend other policies.** State has identified the need to establish or amend additional DEIA policies. For example, State is developing a Disability Policy to outline a commitment to inclusion and access for people with disabilities, according to officials. In addition, while State extends medical and other benefits to same-sex spouses of employees serving overseas, officials stated that they continue to work with host governments to recognize diplomatic privileges for same-sex spouses.

State Is Generally Addressing Recruitment and Has Plans to Address Gaps

We determined that State's actions generally address the recruitment leading practice, as shown in table 5. State has plans to improve its effectiveness assessments of recruitment efforts, as well as to address retention issues noted by employee organizations.

Table 5: GAO's Assessment of Department of State's Actions Compared to Recruitment Leading Practice for Diversity and Inclusion Management

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Recruitment: The process of attracting a supply of qualified, diverse applicants.	Generally address	A recruitment strategy	Address
Recruitment: The process of attracting a supply of qualified, diverse applicants.	Generally address	Partnerships with diverse academic institutions that have diverse student populations	Address
Recruitment: The process of attracting a supply of qualified, diverse applicants.	Generally address	Partnerships with diverse professional organizations	Address
Recruitment: The process of attracting a supply of qualified, diverse applicants.	Generally address	Effectiveness assessment of recruitment efforts	Partially address

Legend: For the overall rating: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed. For the step rating: ◖—Address. ➲—Partially address. ◗—Do not address.

Source: GAO analysis of State Department actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

Specifically, State has taken several actions that work to address recruitment, such as developing

- **A recruitment strategy.** State's 2019-2023 Workforce Plan outlines the department's recruitment and hiring plans, as well as workforce demographics and gaps. As described in this plan, State has fellowships and programs that target historically underrepresented groups at State, including the Thomas R. Pickering Foreign Affairs Fellowship and Charles B. Rangel International Affairs Program, which recruit candidates for the Foreign Service by providing fellowships to college seniors and graduates. Both programs seek to attract highly talented and qualified individuals who represent ethnic, racial, gender, social, and geographic diversity. State expanded these programs by 50 percent in fiscal year 2021 to a total of 90 fellows annually. In addition, State has several initiatives to hire people with disabilities, including the Workforce Recruitment and Selective Placement programs.
- **Partnerships with diverse academic institutions and professional organizations.** State maintains partnerships with a variety of academic institutions and professional organizations. For example, as of January 2022, seven of State's 16 Diplomats in Residence resided at historically black colleges and universities and Hispanic-serving institutions.[24] In addition, State's recruiters focus on other historically disadvantaged groups, such as people with disabilities, veterans, and women. See figure 5 for examples of diversity-focused organizations and initiatives that State recruiters partner with, including the American Indian Science and Engineering Society and career fairs promoting diversity in science, technology, engineering, and mathematics (STEM).

[24]Diplomats in Residence are Foreign Service Officers and specialists located throughout the United States who provide guidance and advice to students and professionals on careers, internships, and fellowships.

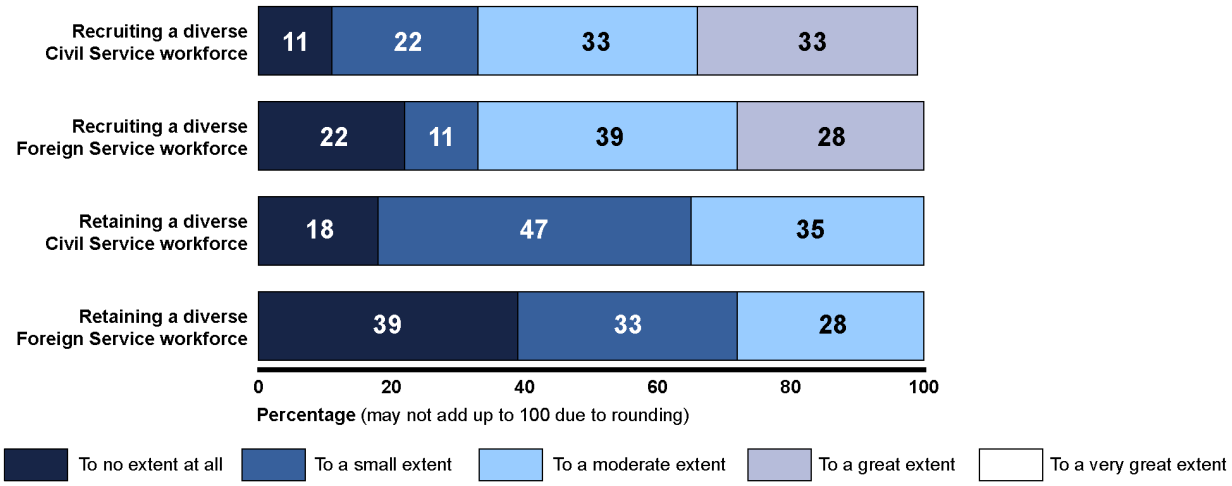
Figure 5: Examples of Department of State's Recruitment Events Demonstrating Partnerships with Diverse Professional Organizations and Initiatives

Source: Department of State Twitter account. | GAO-22-105182

State officials told us that they continually assess their recruitment efforts and have identified additional actions to improve their assessments. Specifically, State officials said they review participant surveys and track the number of candidates who sign up for information following recruitment events. State also monitors the demographic diversity of Civil and Foreign Service generalists and specialists, the Senior Executive Service, and Pickering and Rangel fellows to assess the department's new hire diversity. For example, State officials told us that they review changes over time to Pickering and Rangel diversity metrics to determine if the department needs to make changes to the fellowships. State officials explained that they have several planned actions to gather additional data on recruitment to help improve their effectiveness assessments. For example, officials stated that they have not formally assessed the Pickering and Rangel fellowships since 2013, and are planning a new assessment of these programs. In addition, State is testing a standardized survey for recruiters and system to track Civil and Foreign Service applicants and gather data for intake analysis.

Employee organizations had generally positive views of State's recruitment efforts, but raised concerns with State's retention of a diverse workforce. As figure 6 shows, 66 and 67 percent of respondents to our survey (12 of 18) said that State was moderately to very effective at recruiting a diverse Civil and Foreign Service workforce, respectively. In contrast, the majority of survey respondents rated State's retention efforts negatively. Specifically, 65 percent of survey respondents (11 of 17) said that State was not at all or to a small extent effective at retaining a diverse Civil Service. For the Foreign Service, 72 percent of respondents (13 of 18) said the same, with 39 percent (7 respondents) selecting that State retains a diverse Foreign Service workforce "to no extent at all."

Figure 6: Employee Organization Survey Responses on Effectiveness of Department of State's Efforts to Recruit and Retain a Diverse Civil and Foreign Service Workforce



Source: GAO analysis of survey of Department of State employee organizations. | GAO-22-105182

Accessible Data for Figure 6: Employee Organization Survey Responses on Effectiveness of Department of State's Efforts to Recruit and Retain a Diverse Civil and Foreign Service Workforce

Category	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Recruiting a diverse Civil Service workforce (Percentage)	11	22	33	33	0
Recruiting a diverse Foreign Service workforce (Percentage)	22	11	39	28	0
Retaining a diverse Civil Service workforce (Percentage)	18	47	35	0	0

Category	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Retaining a diverse Foreign Service workforce (Percentage)	39	33	28	0	0

Note: The percentages above do not include those employee organizations that responded with "no basis to judge," which ranges from two to three organizations per question. See question 10 in app. III for full results.

In addition, nine of the 20 employee organizations responding to our survey, as well as union officials, commented on the importance of recruitment and retention efforts, with a focus on increasing racial, ethnic, gender, and other diversity at all levels of the department to improve retention. One group further commented that improved retention of a diverse workforce would incorporate DEIA into State's organizational culture and positively affect recruitment. To help improve retention, State created a retention unit in 2021 to explore issues affecting retention and to develop the first department-wide retention strategy. In addition, State officials told us that the department plans to launch exit interviews this year to further identify reasons why employees leave, including potential DEIA issues. The department also plans to survey the State workforce on retention to help identify best practices and reasons employees choose to remain at State, according to officials.

State Is Generally Addressing Succession Planning and Has Plans to Address Gaps

We determined that State's actions generally address the succession planning leading practice, as shown in table 6. State also has plans for future efforts to help ensure it identifies a diverse pool of candidates for promotion.

Table 6: GAO's Assessment of Department of State's Actions Compared to Succession Planning Leading Practice for Diversity and Inclusion Management

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Succession planning: An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	Generally address	Documented succession planning to ensure diverse leaders	Address

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Succession planning: An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	Generally address	Diverse evaluators, reviewers, or assessors that comprise hiring and promotion panels	Address
Succession planning: An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	Generally address	Commitment to professional development of promotion candidates	Address
Succession planning: An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	Generally address	Diverse pool of candidates identified for promotion	Partially address

Legend: For the overall rating: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed. For the step assessment: ◖—Address. ➲—Partially address. ◗—Do not address.

Source: GAO analysis of State Department actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

Specifically, State has taken several actions that work to address succession planning, including

- **A documented succession plan.** In addition to recruitment and hiring plans, State's Five-Year Workforce Plan outlines the department's commitment to retaining and developing a diverse workforce, including potential future leaders. For example, the plan discusses the need to train and develop potential leadership candidates. In addition, State officials said they plan to create a unit in 2022 or 2023 for Civil Service succession planning, with responsibility for developing and implementing a succession planning process. This process could include developing a Leadership Development Program to target succession planning in upper Civil Service levels.
- **Diverse members of hiring and promotion panels.** State works to ensure that hiring and promotion panel members are diverse, according to officials. In particular, the Foreign Service Act of 1980 requires, among other things, that a "substantial number of women and members of minority groups" should be appointed to Foreign

Service promotion panels.[25] To meet this requirement, State officials said that they ask, but cannot require, volunteers to self-identify their demographic information when they apply to serve on promotion panels. They then select members to ensure a diverse panel, conducting additional volunteer outreach as necessary. According to officials from the Bureau of Global Talent Management, the Civil Service does not have a similar diversity requirement because it does not generally use promotion panels, but it does seek to promote inclusive hiring. For example, State's Manager's Guide for Civil Service Hiring states the importance of having diverse interview panels.

- **Professional development opportunities.** State has a variety of professional development opportunities for Civil and Foreign Service staff. For example, State's Civil and Foreign Service mentoring program connects employees to mentors and provides toolkits and resources to enhance professional growth. In February 2022, State also began a mentoring program for Locally Employed staff.

State has taken several actions to identify a diverse pool of promotion candidates, and has plans to help further increase promotion pool diversity. In particular, State conducts outreach to employee organizations and diverse professional organizations to promote diversity for its Senior Executive Service Candidate Development Program. State also reviews candidates' demographic data after Civil and Foreign Service promotion decisions to determine if State needs to make any procedural changes to the promotion process. State has identified other actions to help increase the diversity of promotion pools, such as analyzing Civil Service applicants based on demographic data to determine if there are any disparities in the qualification and selection for positions. In addition, State is reviewing how the department develops

[25]State and the act refer to these promotion panels in the Foreign Service as selection boards. Specifically, the Foreign Service Act of 1980 requires that selection boards established under the act to evaluate the performance of members of the Foreign Service include public members and that the Secretary of State assure that a substantial number of women and members of minority groups are appointed to each of these selection boards. The Foreign Service Act of 1980, Pub. L. No. 96-465, § 602, 94 Stat. 2095 (Oct. 17, 1980), codified as amended at 22 U.S.C. § 4002. In May 2022, State's Office of the Inspector General reported that the recruitment and selection process for public members was inconsistent with the department's ethics rules and lacked adequate oversight and internal controls to minimize the risk of favoritism. The office made 13 recommendations, to which State agreed. That report focused on the recruitment and selection process for public members, whereas our report focuses on the diversity of the overall selection boards. U.S. Department of State Office of Inspector General, *Review of the Recruitment and Selection Process for Public Members of Foreign Service Selection Boards*, ESP-22-02, May 2022.

and promotes Foreign Service employees to ensure an equitable process.

State Is Partially Addressing Measurement but Lacks Performance Measures and Progress Assessment

We determined that State's actions partially address the measurement leading practice, as shown in table 7. State's efforts leave significant gaps in using performance measures to assess progress towards its DEIA goals.

Table 7: GAO's Assessment of Department of State's Actions Compared to Measurement Leading Practice for Diversity and Inclusion Management

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Feedback from employee resource groups, affinity groups, or special emphasis groups	Address
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Assessment of employee perceptions of diversity and inclusion	Partially address
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Analysis of workforce composition data or trends	Partially address
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Use of performance measures based on reliable and accurate data	Do not address
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Holistic assessment of diversity and inclusion programs, plans, and policies	Partially address

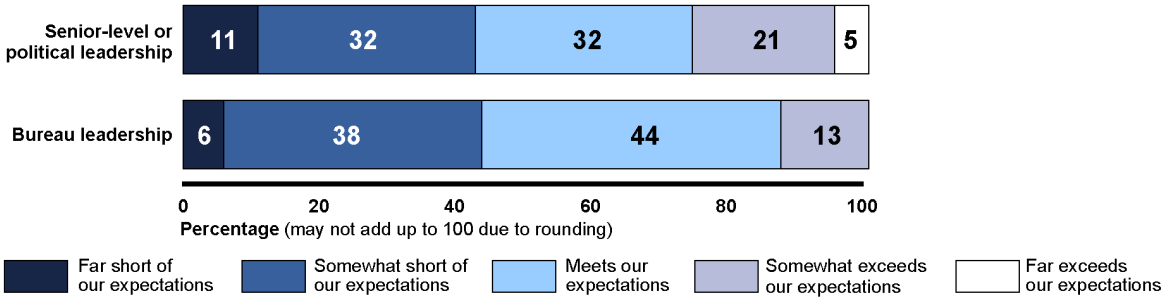
Legend: For the overall rating: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed. For the step rating: ●—Address. ◔—Partially address. ○—Do not address.

Source: GAO analysis of State Department actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

State has taken actions that work to address the measurement leading practice, such as employing various methods to gather feedback from

employees on diversity and inclusion efforts. For example, according to State officials, the Bureau of Global Talent Management meets monthly with employee organizations, and senior State leaders meet quarterly with employee organizations in a diversity forum. S/ODI also maintains a DEIA email box for all employees to communicate concerns and ask questions, and officials said the office aims to respond to emails within 24 hours. As figure 7 shows, the majority of the surveyed employee organizations responded that senior and bureau leadership meets or exceeds their expectations for follow-up on their diversity and inclusion feedback. However, 43 percent (8 of 19) and 44 percent (7 of 16) said that senior and bureau leadership follow-up, respectively, falls somewhat short or far short of their expectations.

Figure 7: Employee Organization Survey Responses on Department of State Leadership's Follow-up on Diversity and Inclusion Feedback



Source: GAO analysis of survey of Department of State employee organizations. | GAO-22-105182

Accessible Data for Figure 7: Employee Organization Survey Responses on Department of State Leadership's Follow-up on Diversity and Inclusion Feedback

Category	Far short of our expectations	Somewhat short of our expectations	Meets our expectations	Somewhat exceeds our expectations	Far exceeds our expectations
Senior-level or political leadership (Percentage)	11	32	32	21	5
Bureau leadership (Percentage)	6	38	44	13	0

Note: The percentages above do not include those employee organizations that responded with "no basis to judge," which ranges from one to four organizations per question. See question 8 in app. III for full results.

State recently took action to assess employee perceptions of diversity and inclusion through an employee survey. Prior to 2020, State used the Federal Employee Viewpoint Survey, administered by OPM, to measure

employees' perceptions of inclusion. However, in 2020, OPM removed the relevant inclusion questions, and State did not have other mechanisms to gather similar information.[26] State recently launched an effort that it plans to use to assess employee perceptions of DEIA. In April 2022, State distributed a voluntary DEIA climate survey to all Civil and Foreign Service staff to gather and analyze views of department performance on DEIA issues. State officials explained that the survey results would help monitor employee views over time and inform performance measures for the department's DEIA Strategic Plan. State plans to conduct this survey biannually and distribute a similar survey to Locally Employed staff and contractors in the future, according to officials.

State has taken some steps to analyze workforce composition. In particular, State has analyzed different aspects of workforce composition data through its demographic baseline and barrier analysis efforts. S/ODI convened a DEIA data working group that consists of direct hire and contractor staff from S/ODI, the Bureau of Global Talent Management, the Office of Civil Rights, and the Center for Analytics.[27] This group established a demographic baseline of State's Civil and Foreign Service workforce by race, ethnicity, disability, and gender. The baseline report presents demographic data as of the end of fiscal year 2021 by bureau, employment type, and grade, and compares State's data to the most relevant occupations in the U.S. Labor Force data. State shared this baseline with members of the Diversity and Inclusion Leadership Council in January 2022 and made it available to the entire workforce, according to State officials. S/ODI officials told us that this baseline will allow State to track demographic data over time and share detailed data with bureaus, such as the bureau's demographic makeup compared with U.S. Labor Force benchmarks. State has also taken steps to conduct barrier analyses; however, we found gaps in State's efforts as discussed later in this report.[28]

[26]According to OPM officials, OPM developed a new DEIA index, which expands on inclusion and other relevant measures. OPM tested this DEIA index in 2021 and included it in the 2022 Federal Employee Viewpoint Survey.

[27]The Center for Analytics is part of the Office of Management Strategy and Solutions that reports to the Undersecretary for Management. According to State, the Center for Analytics is the department's official enterprise data management and analytics capability, using data to inform management and foreign policy decisions.

[28]We examine State's barrier analysis efforts in our analysis of the steps State has taken to identify, investigate, and eliminate barriers to workforce diversity since January 2020.

We found that State does not have performance measures for its DEIA goals and objectives in the workplace, and thus does not have the information needed to assess progress toward these goals. State uses some metrics on recruiting, hiring, and advancement of persons with disabilities, as required as part of the annual EEOC Management Directive 715 (MD-715) reporting process. State also has an Agency Priority Goal to bring the number of employees with disabilities to at least 15.3 percent of their workforce, with 2.4 percent being persons with targeted disabilities, by September 30, 2023.[29] However, these metrics do not represent the entirety of State's workforce or DEIA goals as outlined in the DEIA Strategic Plan. Although State completed the DEIA Strategic Plan in March 2022, officials told us in May 2022 that State did not have performance measures that measure the outcomes of or progress toward its DEIA goals, because they did not have the time to develop them. Instead, they explained that State's DEIA actions had operational measures to determine whether a task was completed. As of June 2022, the plan was undergoing review for final clearance from the White House Domestic Policy Council, according to officials.

Officials stated that they were aware that State is not measuring the effectiveness of its DEIA goals in the DEIA Strategic Plan and needs to develop performance measures to do so. In particular, S/ODI leads a DEIA implementation team—comprising senior officials from the Bureau of Global Talent Management and the Office of Civil Rights, among others—that plans to meet quarterly starting in June 2022. In addition to reviewing progress on State's actions in the DEIA Strategic Plan, this team plans to discuss how to develop performance measures.

State's lack of performance measures also limits its ability to holistically assess diversity and inclusion programs, plans, and policies. Nevertheless, State has undertaken some actions intended to assess the department's diversity and inclusion initiatives. These include assessing the state of its DEIA efforts as required by Executive Order 14035;

[29]U.S. Department of State and U.S. Agency for International Development, *Joint Strategic Plan FY2022-2026*, March 2022. According to EEOC, targeted disabilities are a subset of the larger disability category and the federal government has identified certain targeted disabilities for special emphasis in affirmative action programs. These targeted disabilities include developmental disabilities, traumatic brain injuries, deafness or serious difficulty hearing, blindness or severe difficulty seeing, missing extremities, significant mobility impairments, partial or complete paralysis, epilepsy or other seizure disorders, intellectual disabilities, significant psychiatric disorders, dwarfism, and significant disfigurement. See 29 C.F.R. 1614.203(a)(9).

revising its DEIA Strategic Plan; and reviewing its equal employment opportunity programs, plans, and policies as part of annual MD-715 reporting. However, without performance measures, State does not have a process to holistically review its DEIA programs and its progress toward goals.

Our Leading Practices for Diversity and Inclusion Management state that quantitative and qualitative performance measures help ensure diversity aspirations become practice.[30] In addition, leading practices we identified for performance management state that agencies should use performance measures to track progress toward goals and conduct regular program evaluations to assess and learn how to improve results.[31]

Without performance measures and a process to evaluate progress against those measures, State will not have the information necessary to assess its DEIA programs, plans, and policies and determine what progress the department has made or areas where there are opportunities for growth in its workplace.

State Is Partially Addressing Accountability but Has Not Taken Sufficient Actions to Meet Goals

We determined that State is partially addressing the accountability leading practice, as shown in table 8. State has not taken sufficient actions designed to enhance the effectiveness of accountability mechanisms, including for managers and supervisors.

Table 8: GAO's Assessment of Department of State's Actions Compared to Accountability Leading Practice for Diversity and Inclusion Management

Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Accountability: The means to ensure that leaders are responsible for diversity by linking their performance assessment to the progress of diversity initiatives.	Partially address	Diversity and inclusion performance objectives for managers and supervisors	Partially address

[30]GAO-05-90.

[31]GAO, Program Evaluation: Key Terms and Concepts, GAO-21-404SP (Washington, D.C.: March 2021).

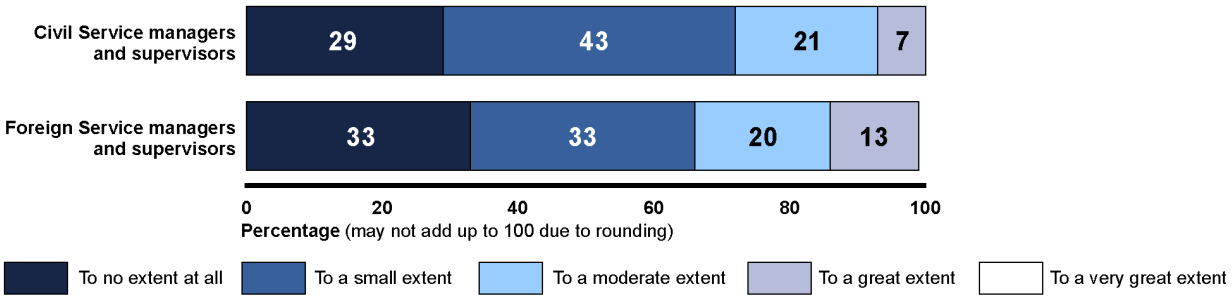
Leading practice	GAO overall rating	Steps GAO assessed for this leading practice	GAO step rating
Accountability: The means to ensure that leaders are responsible for diversity by linking their performance assessment to the progress of diversity initiatives.	Partially address	Evaluation of managers and supervisors based on achievement of their diversity and inclusion goals	Partially address

Legend: For the overall rating: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed. For the step rating: ◖—Address. ◗—Partially address. ◡—Do not address.

Source: GAO analysis of State Department actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

The CDIO and union officials discussed the lack of accountability for managers and supervisors as a challenge for State's DEIA efforts. In addition, when asked the extent to which State holds managers and supervisors accountable for their progress toward achieving State's diversity and inclusion goals, 72 percent of employee organization survey respondents (10 of 14) selected "to a small extent" or "to no extent at all" for the Civil Service. Sixty-six percent (10 of 15) selected these responses for the Foreign Service. Figure 8 shows the full range of employee organization responses.

Figure 8: Employee Organization Survey Responses on the Extent to which the Department of State Holds Managers and Supervisors Accountable for their Progress toward Achieving Diversity and Inclusion Goals



Source: GAO analysis of survey of Department of State employee organizations. | GAO-22-105182

Accessible Data for Figure 8: Employee Organization Survey Responses on the Extent to which the Department of State Holds Managers and Supervisors Accountable for their Progress toward Achieving Diversity and Inclusion Goals

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Civil Service managers and supervisors (Percentage)	29	43	21	7	0
Foreign Service managers and supervisors (Percentage)	33	33	20	13	0

Note: The percentages above do not include those employee organizations that responded with "no basis to judge," which ranges from five to six organizations per question. See question 6 in app. III for full results.

To improve accountability, State has taken steps to incorporate DEIA objectives into employee performance evaluations, but these changes do not yet apply to all employees. State's 2018-2021 performance evaluation objectives for staff included some language on valuing and fostering diversity and inclusion, but did not include separate objectives for DEIA.[32] State revised its performance evaluation objectives for 2022-2025 to include specific DEIA objectives for staff, including for managers and supervisors. In particular:

- State's revised Foreign Service performance objectives applied beginning in April 2022, according to State officials. One of the five performance objectives is an expectation that all entry-, mid-, and senior-level employees demonstrate effective support for DEIA. According to State guidance, promotion panels weigh all five performance objectives equally when considering competitiveness for promotion.
- State is piloting the revised Civil Service performance objectives with five offices in 2022, and plans to distribute them to the remaining offices beginning in January 2023, according to State officials. The objectives will include a mandatory performance objective for supervisors to cultivate a more diverse, equitable, and inclusive workforce and adhere to equal employment opportunity principles. State officials explained that this performance objective will not apply

[32]In particular, the 2018-2021 Civil Service performance documents included language on valuing diversity and supporting an inclusive work environment, and the 2018-2021 Foreign Service performance documents included language on fostering diversity and inclusion, such as supporting equal employment opportunity principles.

to the senior-level Civil Service, but they are planning to identify DEIA criteria for Senior Executive Service performance plans by the fall of 2022.

According to the CDIO, the performance evaluation revisions are an important step in achieving greater accountability for staff, managers, and supervisors to uphold DEIA. However, given that the performance objectives go into effect for the Civil Service workforce in 2023, it is too early to determine how State will evaluate managers and supervisors department-wide based on their achievement of these DEIA objectives.

Moreover, the revised performance objectives may not fully address State's significant accountability gaps, such as ensuring that managers face consequences for not upholding DEIA values. In order to comply with federal requirements, State maintains antidiscrimination and antiharassment policies, including a formal and informal equal employment opportunity complaint process for employees to report acts of discrimination. However, the CDIO, employee organization survey respondents, and union officials highlighted concerns that managers and supervisors do not face consequences when they fail to uphold DEIA values and violate equal employment opportunity principles. In addition, an employee organization commented and union officials discussed how such managers and supervisors negatively affect retention of diverse staff. The CDIO told us that the department has more to do to strengthen accountability for managers and supervisors, including providing additional legal support for employees making equal employment opportunity complaints and increasing transparency by providing more information to employees about the resolution of such complaints.

State has not taken sufficient actions to enhance the effectiveness of the department's accountability mechanisms. In particular, State officials explained that one of the overall goals in State's DEIA Strategic Plan is to enhance accountability, including by eliminating discrimination, bullying, and toxic management. They told us that the actions associated with this goal focus on making existing processes stronger and more transparent, such as strengthening the vetting for senior leadership positions and improving the timeline for equal employment opportunity complaints. Officials acknowledged that State could do more to ensure that its actions in the DEIA Strategic Plan will make accountability mechanisms more effective. In particular, they explained that the planned actions do not focus on analyzing the effectiveness of accountability mechanisms, such as the revised DEIA performance objectives for managers and supervisors, or changing policies to ensure effectiveness.

Federal internal control standards state that management should design control activities to achieve objectives, such as creating policies and mechanisms to enhance accountability, including for managers and supervisors.[33] In addition, our Leading Practices for Diversity and Inclusion Management state that accountability is a key element for organizations to ensure the success of a diversity management effort, including by ensuring that managers at all levels are made responsible for diversity in their organizations.[34]

Without additional actions to enhance accountability, including for managers and supervisors, such as ensuring the effectiveness of accountability mechanisms, State may not achieve one of the strategic DEIA goals for the department to enhance accountability, which may hinder State's vision of fostering a diverse and inclusive workplace.

State Has Taken Steps to Analyze Barriers to Diversity, but Its Analyses Vary in Depth and Have Methodological Weaknesses

State Has Launched Several Barrier Analysis Initiatives

In January 2020, we reported that while State's Civil and Foreign Service workforce had grown more diverse from fiscal years 2002 through 2018, some historically disadvantaged racial or ethnic groups and women were underrepresented, particularly in the senior ranks. We recommended that State take additional steps to identify diversity issues that could indicate potential barriers to equal opportunity in its workforce.[35]

State launched the following multidisciplinary initiatives to identify potential barriers since January 2020:

- In response to our recommendation, in August 2020, State launched four barrier analysis working groups led by the Bureau of Global Talent Management to identify, investigate, and eliminate barriers to

[33]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

[34]GAO-05-90.

[35]GAO-20-237.

diversity in the Civil and Foreign Services.[36] These groups consisted of about 13 representatives from the Bureau of Global Talent Management, the Office of Civil Rights, and the Under Secretary for Management, as well as S/ODI after it was established in 2021.

- After S/ODI was established in June 2021, it convened the DEIA data working group, which now leads State's barrier analysis efforts and meets weekly to coordinate and solicit ideas for department-level barrier analyses, according to State officials.[37] As of May 2022, the DEIA data working group is made up of 20 direct-hire and contractor staff from S/ODI, the Bureau of Global Talent Management, the Office of Civil Rights, and the Center for Analytics.

State Has Taken Some Steps to Identify, Investigate, and Eliminate Barriers to Workforce Diversity

Identify indicators of potential barriers. State has taken some steps since January 2020 to identify indicators of potential barriers. Specifically, the barrier analysis working groups identified four indicators of potential barriers, described in table 9.

Table 9: Indicators of Potential Barriers the Department of State Identified Since January 2020

Steps to identify indicators of potential barriers	Indicators of potential barriers identified
State analyzed Foreign Service Officer test pass rates by gender, race, and ethnicity.	African American Foreign Service Officer test takers had significantly lower pass rates than members of other racial or ethnic groups.
State analyzed Foreign Service Officer test takers by gender.	Fewer women took the Foreign Service Officer test.
State analyzed the distribution of Whites versus other racial or ethnic groups by grade level for Civil Service mission critical occupations.	Whites were selected for promotion more frequently than members of other racial or ethnic groups above the GS-13 level, despite comparable application and referral rates.
State analyzed GAO's 2020 report on the demographic composition of the Foreign and Civil Services by gender, race, and ethnicity.	Women and members of historically disadvantaged racial or ethnic groups were underrepresented in the senior ranks of the Foreign Service.

Source: GAO analysis of State Department documents. | GAO-22-105182

[36]The barrier analysis working groups covered the following: (1) Civil Service promotion rates, (2) Foreign Service promotion rates, (3) Foreign Service Officer Test pass rates, and (4) rates of Foreign Service Officer job declinations. As of May 2022, State was continuing to analyze Civil Service and Foreign Service promotions and Foreign Service Officer Test pass rates. State completed the Foreign Service Officer job declinations analysis in December 2020.

[37]State officials told us that some bureaus have also conducted their own barrier analyses. We did not evaluate bureau-level barrier analyses.

In two other cases, the barrier analysis working groups determined that there were no indicators of potential barriers to diversity, as shown in table 10.

Table 10: Department of State's Steps that Resulted in No Identified Indicators of Potential Barriers to Diversity since January 2020

Steps to identify indicators of potential barriers	State's determination
State analyzed the rate people declined Foreign Service Officer job offers by gender.	State determined there were no significant differences in declinations between men and women.
State analyzed promotion outcomes from Foreign Service class 4 to 3 by racial or ethnic group.	State determined there were no clear and consistent disparities in promotions between Whites and members of other racial or ethnic groups.

Source: GAO analysis of State Department documents. | GAO-22-105182

As of May 2022, State's DEIA data working group was analyzing the following data to identify indicators of potential barriers, according to State officials:

- Civil Service job applicant data by grade level, gender, disability, race, and ethnicity to determine whether there are disparities in who State qualifies and selects for positions.
- Mid-level Foreign Service bidding and assignment data to determine whether there are disparities in how State assigns Foreign Service Officers to posts.
- Promotion and retention data for Foreign Service employees hired from 1990 to 2014, in 5-year intervals, to determine what, if any, barriers each group faces.

According to State officials, the DEIA data working group prioritized these analyses from a list of over 80 ideas they collected from bureaus in August 2021, after determining they had the potential to have the greatest effect.

Investigate and eliminate potential barriers. State has also taken some steps since January 2020 to investigate and eliminate the four potential barriers to diversity that the barrier analysis working groups identified. See table 11.

Table 11: Department of State's Steps to Investigate and Eliminate Barriers to Workforce Diversity since January 2020

Indicators of potential barriers identified	Steps to investigate to discover actual barriers	Steps to eliminate barriers
African American Foreign Service Officer test takers had significantly lower pass rates than members of other racial or ethnic groups.	State officials 1. examined a 2016 report that revealed that African American alumni from certain schools had higher pass rates than the overall average of all test-takers; 2. commissioned a 1-year study in September 2021 to further research differentiating factors in how universities prepare people for the test and recommend ways the department can better support universities in preparing students and recruit African American students; and 3. analyzed all 2021 Foreign Service test results and applications and found that some candidates who did not pass the test would have passed the next stage of the qualification process, including candidates from historically disadvantaged racial or ethnic groups.	State revised the first step of its Foreign Service qualification process in April 2022 to evaluate Foreign Service candidates based on personal narratives, work history, education, and experience in addition to Foreign Service Officer test scores beginning in June 2022. State also plans to use the results of the 1-year study to guide any additional efforts to eliminate potential barriers.
Fewer women took the Foreign Service Officer test.	None.	State adapted its recruitment strategies, including expanding outreach to potential female candidates and highlighting recent policy changes that have boosted workplace flexibilities.
Whites were selected for promotion more frequently than members of other racial or ethnic groups above the GS-13 level, despite comparable application and referral rates.	State surveyed select Civil Service hiring managers and human resources staff to gather more information on bureaus' training, interviewing, and selection procedures. The survey showed that interviewers needed more training and guidance on how to objectively evaluate candidates.	State launched a 1-year pilot in September 2021 for GS-14 and -15 job openings to standardize interview procedures and require interviewers to take unconscious bias training.

Indicators of potential barriers identified	Steps to investigate to discover actual barriers	Steps to eliminate barriers
Women and members of historically disadvantaged racial or ethnic groups were underrepresented in the senior ranks of the Foreign Service.	State officials 1. interviewed a subset of Foreign Service promotion panel members from the 2019 promotion cycle who indicated they did not have enough time to thoroughly review all candidates, which can increase risk for unconscious bias; 2. consulted with Bureau of Global Talent Management experts who said the Area for Development box in the employee evaluation form was inconsistently used which can increase the risk for unconscious bias; 3. analyzed the career progression of Foreign Service Officers from 1981-2020 and found there is increasing diversity in the pipeline to the senior ranks; 4. estimated expected Foreign Service Officer attrition rates by gender, race, and ethnicity based on 2004-2020 data and found higher than expected attrition rates for women and members of historically disadvantaged racial or ethnic groups at some career stages; and 5. analyzed Foreign Service Officer retention rates by gender, race, and ethnicity from 1986-2021 and found several disparities in retention.	According to officials, beginning with the 2022 promotion cycle, State 1. divided larger Foreign Service promotion panels into smaller units, which officials said will allow for additional time to review candidates, and 2. removed the Area for Development box in the employee evaluation form to decrease the risk of unconscious bias in employee narratives. State established a retention unit to better understand and address issues that may be causing employees to leave the department.

Source: GAO analysis of State Department documents and interviews. | GAO-22-105182

Assess the success of plans to eliminate barriers. In January 2014, State implemented a plan to eliminate barriers in the Civil Service Senior Executive Service promotions process to increase the diversity of the applicant pool, among other things. For example, the process required bureaus to develop an outreach plan to target more diverse audiences for all Senior Executive Service positions. In November 2021, State began to analyze the demographics of the Senior Executive Service applicant and promotion pools to determine what effect, if any, these changes had. As of May 2022, State was assessing the success of its 2014 plan.

State's Barrier Analyses Vary in Depth

According to U.S. Equal Employment Opportunity Commission (EEOC) guidance, agencies must regularly evaluate their employment practices to identify and investigate barriers to equality of opportunity for all individuals. Where such barriers are identified, agencies must take measures to eliminate them. Additionally, the guidance states that while workforce data are useful as an initial diagnostic tool, they should not be the only information sources agencies use to help identify barriers.

We found that, in some instances, State has followed the steps of the barrier analysis process, in accordance with EEOC guidance. State has analyzed demographic data to identify potential barriers to diversity through its barrier analysis working group and DEIA data working group. In addition, in surveying Civil Service hiring managers and human resources staff, State followed EEOC's guidance by investigating sources other than workforce data to discover why Whites were selected for promotion above the GS-13 level more frequently than members of other racial or ethnic groups despite comparable application and referral rates. By investigating the interview process for possible causes for the disparity, State could be reasonably assured that the steps it took to improve interviewer training and guidance may help address the issue. Similarly, State is investigating the cause of the disparity in Foreign Service Officer test pass rates among African Americans by commissioning a study to research differentiating factors in how universities prepare people for the test.

However, we found that State did not consistently investigate the causes of potential barriers before implementing steps to eliminate them. Specifically, State found that fewer women take the Foreign Service Officer test than men. Before investigating why there was a disparity between women's and men's rates, State responded by changing its recruitment strategies, such as by highlighting recent policy changes that have boosted workplace flexibilities.

There are many potential explanations for why fewer women take the exam. For example, prerequisite skills for entering the Foreign Service; perceptions of the test or the Foreign Service itself; and the timing, format, or testing locations could be possible causes for the discrepancy and different strategies would be required to address each of these. Without consulting additional information sources to investigate root causes, as called for by EEOC guidance—such as surveying or interviewing students, recruiters, candidates, or current staff, or analyzing data on the demographic makeup of schools from which State actively recruits—State cannot be reasonably assured that its response adequately addresses the underlying barriers.

We also found that State does not have a plan for assessing the success of steps to eliminate barriers—the fourth step of the barrier analysis process. State officials also told us that they know monitoring the progress of barrier elimination is an important step in the barrier analysis process; however, they have yet to outline a plan for doing so. Without a plan for assessing the success of barrier elimination efforts, State cannot

be reasonably assured that its efforts were successful or whether they need to make adjustments to improve.

State officials told us that they recognize the importance of barrier analysis, and State has implemented several significant actions to improve and address challenges to barrier analysis since the CDIO was announced in April 2021. State actions include the following:

- **Trained staff:** State funded EEOC barrier analysis training for about 40 staff across the department in April 2022 to raise the level of knowledge and familiarity with barrier analysis methodology and practice, according to officials. Trainees included employees from the DEIA data working group, the retention unit, and several Diversity and Inclusion senior advisors.
- **Issued data sharing policy:** In February 2022, State issued a data usage policy that outlines the acceptable level of demographic information that State can share within and outside of the department to increase transparency around the demographic makeup of its workforce while preserving individuals' privacy. Among other things, this policy enables State to share the demographic baseline more broadly within the department so that leaders and individuals can analyze and identify potential barriers in their own bureaus or units. The DEIA data working group also provides one-on-one consultations with bureaus and units on how to interpret and use the baseline data, according to officials.
- **Improved coordination:** State has taken steps to improve coordination and leverage expertise across the department. Multiple State entities have a role in barrier analysis, so ensuring coordination has been critical. For example, S/ODI oversees the department's diversity and inclusion efforts, the Office of Civil Rights develops State's annual MD-715 reports and submits them to EEOC, and the Bureau of Global Talent Management has access to and expertise on State's personnel data systems. In addition, State officials told us that the department's fragmented personnel systems makes collecting and analyzing the requisite data for some barrier analyses challenging. Officials explained that different workforce groups have separate personnel systems for various stages of employment, such as separate databases for information on Foreign Service and Civil Service promotions. These systems are not easy to understand and restrict access to select users, according to officials. For example, State's analysis of mid-level Foreign Service bidding is complicated by the fact that State does not have a centralized database on bidding and assignments, and each bureau has different bidding processes

and collects different data on the staff who bid and are assigned. As S/ODI has become more established, the various entities involved in barrier analysis have worked to improve coordination and delineate roles and responsibilities. In addition, State's multidisciplinary DEIA data working group helps address these challenges by enabling coordination and leveraging expertise from across the department.

While State has taken steps to improve and overcome challenges to barrier analysis, it has not ensured that it follows all the steps of the barrier analysis process. State officials acknowledged State's barrier analyses vary in their depth and officials want to increase the quality and number of analyses. To date, State has not documented its plan for improving its barrier analysis process to ensure all steps of the process are followed. Without such a plan, State may use resources to implement solutions that do not address the root causes of disparities and may leave barriers to diversity unaddressed.

State May Have Overlooked Barriers to Diversity Due to Methodological Weaknesses

We found several weaknesses in State's barrier analysis methodology that may have prevented the department from identifying disparities that indicate potential barriers to workforce diversity. EEOC requires some federal agencies, including State, to systematically identify, investigate, and eliminate barriers to equal participation at all levels of their workforce. In addition, federal internal control standards state that management should use quality information to achieve objectives, which includes processing data into information and then evaluating the processed information to ensure it is quality.[38]

State Developed and Used Its Own Statistical Methodology to Identify Potential Barriers

State developed and applied its own statistical methodology to analyze Foreign Service promotion outcomes in response to our 2020 report, which identified statistically significant differences in adjusted promotion outcomes between historically disadvantaged racial or ethnic groups and

[38]GAO-14-704G.

Whites from class 4 to 3.[39] State analyzed promotions from class 4 to 3 of each racial and ethnic group for Foreign Service Officers and specialists from 2016 through 2019.[40] State designed its barrier analysis methodology to detect statistically significant disparities that could indicate a potential barrier. Specifically, State:

- analyzed each year, each racial or ethnic group, and Foreign Service specialists and officers, separately;[41]
- compared the actual promotion outcomes to their own expected number of promotions based on a statistical probability assumption known as binomial distribution for each racial and ethnic group;[42] and
- applied a statistical hypothesis test to determine whether the difference between actual promotion outcomes and their own

[39]GAO-20-237. In our 2020 report, we did not identify class 4 to 3 promotions in the Foreign Service as the only disparity based on statistical significance in our adjusted promotion analysis. We presented both a descriptive promotion analysis and an adjusted promotion analysis. For the descriptive analysis, we calculated the percentage point difference and percentage difference in promotion rates for historically disadvantaged racial or ethnic groups. We did not test statistical significance for the descriptive analysis because State's promotion data is from the whole population and not a subject for a statistical significance test. For the adjusted analysis, we conducted discrete-time duration analysis using a logit model that controlled for a variety of factors relevant to promotion, and we analyzed the time duration (number of years) to be promoted. We tested statistical significance for the adjusted regression analysis to test model coefficients. While statistical significance tests in regression models are useful as a diagnostic tool to test model coefficients, they may not be the only information sources agencies use to help identify disparities.

[40]State did not evaluate any other demographic characteristics such as gender or disability status in this analysis. See appendix IV, for more details on State's methodology.

[41]State also analyzed generalists and specialists combined and racial or ethnic minority groups combined.

[42]State calculated their own expected number of promotions for each racial or ethnic group by dividing the total number of available promotion slots by the total number of qualified applicants, and then multiplied that result by the total number of qualified people in each racial or ethnic group in a given fiscal year. In statistics, the binomial distribution is typically used when there are exactly two mutually exclusive outcomes of a trial, such as estimating the number of times a coin will land on heads versus tails. The binomial distribution assumes that each trial is independent and has the same probability.

expected number of promotions in each racial or ethnic group would merit further investigation.[43]

Using this statistical methodology, State concluded that there was not a clear and consistent disparity in promotions from Foreign Service class 4 to 3 for specialists or officers, contrary to our 2020 findings. State shared these results with Congress in a May 2021 report on what State had done in response to our report.[44] State is using a similar statistical methodology to analyze demographic data on Civil Service job applicants to determine whether there is any potential bias in how State qualifies and selects job candidates.

State's Methodology to Identify Potential Barriers Contained Weaknesses

We found several weaknesses in State's methodology that limited the department's ability to identify disparities that indicate potential barriers for certain groups. As a result, State's methodology could not reliably identify indicators of potential barriers to diversity.

We found four key weaknesses in State's methodology:

1. State's promotion analysis relies on statistical significance rather than the magnitude of disparity between the expected number of promotions and actual promotions. As a result, State could only identify extreme disparities as indicators of potential barriers to promotion. Statistical significance tests like the one State used are applied to assess whether the actual outcomes would be unlikely to occur from random chance. Such tests do not necessarily determine whether the magnitude of disparity used in the test is meaningful. Given the small size of the population in State's analysis, such a

[43]A statistical hypothesis test is a method to test a predetermined null hypothesis (i.e., a declaration that there is no statistically significant difference between two variables, such as actual promotion outcomes and expected number of promotions). A test is considered to be statistically significant when the probability of obtaining a sample statistic is lower than a predetermined level of probability in the observed sample. When conducting a statistical hypothesis test, there are two possible decisions: reject the null hypothesis or fail to reject the null hypothesis. If a test fails to reject the null hypothesis, there is not a conclusive decision. In sampling estimates, when an estimate has a larger sample size it will have a smaller standard error, which indicates the estimate is more precise.

[44]Department of State, *Report to Congress on Steps taken to Implement the Recommendation in the GAO report Additional Steps Are Needed to Identify Potential Barriers to Diversity (*GAO-20-237*) (Div. K, P.L. 116-260)*.

statistical significance test would require a larger magnitude of disparity between the actual and expected number of promotions in order to reach the predetermined confidence level.[45] Therefore, State could only detect extreme disparities and greatly reduced its ability to detect meaningful disparities in promotion outcomes. A meaningful disparity in this context, for example, could be a disparity that indicates whether State is achieving goals related to eliminating barriers to equal participation at all levels of their workforce as required by EEOC.

2. State applied a statistical hypothesis test designed for sampling data to estimate results for an entire population. This was not an appropriate method because State had promotion outcome data for the entire population of candidates and therefore did not need to use a methodology for sampling precision. Doing so made it more difficult to identify promotion disparities for less represented racial or ethnic groups.

   Specifically, since historically disadvantaged racial or ethnic groups make up smaller proportions of State's Foreign Service workforce, State's methodology required greater promotion disparities for those groups to identify potential barriers. For example, as shown in table 12, even when three groups have the same expected and actual promotion rates, State's methodology would find insufficient evidence of disparity for the smallest group but very strong evidence of disparity for the largest group.

Table 12: Hypothetical Example of the Department of State's Methodology for Identifying Promotion Disparities across Different Sized Groups

Racial or ethnic group	Number of candidates	Actual promotion rate	Expected promotion rate	Actual promotion outcome	Expected promotions	Difference from expected promotion	Probability from State's statistical hypothesis test	Evidence of lower promotions
Group 1	50	30%	38%	15	19	-4	15%	Insufficient Evidence
Group 2	100	30%	38%	30	38	-8	6%	Weak Evidence
Group 3	250	30%	38%	75	95	-20	1%	Very Strong Evidence

Source: GAO analysis. | GAO-22-105182

Note: State's thresholds for evidence are: 1 percent of probability values is "very strong evidence;" lower than 5 percent of probability values is "strong evidence;" probability values between 5 percent

[45]A statistical hypothesis test rejects the null hypothesis if the probability of actual outcomes is lower than the preset level of probability (typically 5 or 10 percent). The 5 percent (10 percent) probability constructs a 95 percent (90 percent) confidence level.

and lower than 10 percent is "weak evidence;" and probability values 10 percent or higher is "insufficient evidence."

3. State compared the actual promotion outcomes to their own expected number of promotions using a binomial distribution, so State's analysis did not take into account other factors that can influence promotion outcomes.[46] For example, State did not consider factors such as education level and serving in hardship assignments that may have varied across eligible candidates and that could affect a candidate's likelihood of promotion. By not taking such factors into account, State may have miscalculated promotion outcome disparities.

4. State compared the actual promotion outcomes to their own expected number of promotions for each racial or ethnic group separately, thus overlooking the mutually exclusive nature of promotion outcomes. For example, in 2016, people from racial or ethnic minority groups had 14 promotions fewer than State expected, while Whites had 12 promotion slots more than State expected.[47] The actual differences in promotion outcomes between people from racial or ethnic minority groups and Whites would be about 26 (14+12) because one candidate's promotion outcome affects the promotion outcomes of the other candidates. Specifically, when one person is promoted, there is one less opportunity for the remaining candidates. However, State's methodology only took into account the fact that the racial or ethnic minority group had 14 promotions fewer than expected. As a result, State understated the magnitude of promotion disparities.

State officials recognized that some of their methods were not ideal. They said that they are continually seeking ways to improve their methodology and that it is challenging to identify tools to determine whether variations are significant enough to merit further department action. They explained that candidate pools change each year, which introduces extra variables, and competition groups are often small. Therefore, if disparities exist in one year or for one group, it is difficult for State management to know whether the disparities are significant enough to merit further department action. However, given the weaknesses we identified above, the

[46]State's methodology considered race and ethnicity in assessing promotion outcomes by analyzing each racial or ethnic group separately. It controlled for promotion eligibility because State's promotion data only included those who were eligible for promotion, which requires that candidates meet certain criteria such as particular skills, years of service, and class level.

[47]Whites in State's analysis includes both White-non-Hispanic and White-Hispanic employees.

methodology State used would not reliably distinguish significant disparities from insignificant ones, because their methodology errs on the side of overlooking actual disparities. In addition, EEOC guidance does not state that disparities must be statistically significant in order to merit agency action.[48] EEOC guidance also states that workforce data are only the starting point of barrier analysis, and that conclusions concerning the existence of workplace barriers cannot be drawn from numerical assessments. Rather, agencies should explore other sources of data, including equal employment opportunity complaint data, grievance data, exit interview data, results from surveys and focus groups, anecdotal evidence from various stakeholders, and reports from outside organizations.

Ultimately, State's methodology did not produce quality information, which diminished State's ability to reliably identify disparities that indicate potential barriers to diversity. Therefore, State may not adequately address those barriers and thus may not achieve its goal to increase diversity in the workforce. In addition, because of weaknesses in State's methodology, its May 2021 report to Congress included potentially inaccurate information, which diminished the quality of information for Congress to use in its oversight of State's steps to identify, investigate, and eliminate barriers to diversity.

Conclusions

State has repeatedly emphasized the importance of fostering a diverse and inclusive workforce and has worked to improve diversity, equity, inclusion, and accessibility in the workplace. State's actions address or generally address most leading practices for managing workplace diversity and inclusion. However, gaps remain in measurement and accountability. In particular, State does not have performance measures to assess progress of its DEIA efforts, and has not taken sufficient actions to enhance accountability for DEIA goals. By establishing ways to measure and evaluate progress and strengthen accountability for

[48]EEOC guidance provides several methods that agencies can use to identify indicators of potential barriers, including comparing their workforce data to the relevant civilian labor force from the Census Bureau's Equal Employment Opportunity tabulation, which is the method we used for our 2020 report. See GAO-20-237 for our full methodology and results.

achieving its DEIA-related goals, State will be better positioned to achieve its vision of fostering a diverse and inclusive workplace.

State has taken some steps to identify, investigate, and eliminate barriers to workforce diversity, but its analyses are not consistent in depth and have methodological weaknesses. State has followed several steps of the barrier analysis process outlined in EEOC guidance. However, State did not consistently investigate the cause of some potential barriers before implementing steps to eliminate them or develop a plan for assessing the success of its steps to eliminate barriers. Further, weaknesses in State's statistical methodology limited its ability to identify potential barriers. By creating a plan to improve its barrier analysis process to ensure all steps are followed, and improving its statistical methodology to ensure it is appropriate for identifying potential barriers, State could more effectively implement solutions that address the root causes of disparities and eliminate barriers to diversity.

Recommendations for Executive Action

We are making the following four recommendations to State:

The Secretary of State should ensure the Office of Diversity and Inclusion establish performance measures for State's DEIA-related goals and objectives in the workplace and develop a process to evaluate progress. (Recommendation 1)

The Secretary of State should develop and implement additional actions to enhance accountability for workplace DEIA goals, including for managers and supervisors, such as analyzing the effectiveness of accountability mechanisms. (Recommendation 2)

The Secretary of State should create a plan to improve State's barrier analysis process that ensures all steps of the process are followed. (Recommendation 3)

The Secretary of State should improve the department's statistical methodology to ensure it is appropriate for identifying potential barriers to diversity. (Recommendation 4)

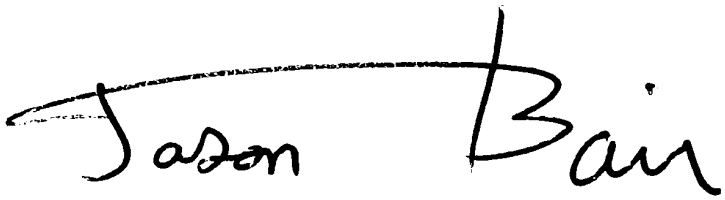
Agency Comments

We provided a draft of this report to State, EEOC, and OPM for comment. State provided formal comments, reproduced in appendix VI, in which it concurred with the recommendations and provided additional comments related to its plans to implement them. State, EEOC, and OPM also provided technical comments, which we incorporated as appropriate.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the appropriate congressional committees, the Secretary of State, the Chair of EEOC, and the Director of OPM. In addition, the report is available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-6881 or at bairj@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix VII.

Sincerely yours,



Jason Bair
Director, International Affairs and Trade

Appendix I: Objectives, Scope, and Methodology

This report examines (1) the extent to which Department of State's actions address leading practices for managing diversity and inclusion in the workplace and (2) the extent to which State has taken steps to identify, investigate, and eliminate barriers to workforce diversity since January 2020, when we issued our last report on State's workforce diversity.[1]

To evaluate the extent to which State's actions address leading practices, we compared State's diversity and inclusion actions to seven leading practices we identified for managing workplace diversity and inclusion: leadership commitment, employee involvement, diversity training, recruitment, succession planning, measurement, and accountability.[2] We also considered guidance in prior GAO reports on performance monitoring and relevant federal internal control standards.[3] In particular, we determined that the control activities component of internal controls was significant to this objective, along with the underlying principle that management design control activities in response to the entity's objectives. We discussed State's diversity, equity, inclusion, and accessibility (DEIA) Strategic Plan with officials and compared it to this principle to identify any gaps.

[1]See GAO, *State Department: Additional Steps Are Needed to Identify Potential Barriers to Diversity*, GAO-20-237 (Washington, D.C.: Jan. 27, 2020).

[2]GAO, *Diversity Management: Expert-Identified Practices and Agency Examples*, GAO-05-90 (Washington, D.C.: Jan. 14, 2005). In 2005, we reported on nine leading practices that we developed. For this review, we assessed whether State's actions were consistent with seven of the nine leading practices. We did not assess State's actions against the "Performance" leading practice because we determined that other leading practices encompassed performance. We also did not assess State's actions against the "Strategic Planning" leading practice because State was updating its diversity, equity, inclusion, and accessibility strategic plan during our review. We determined that "Diversity Management" in GAO-05-90 sufficiently encompasses "Inclusion."

[3]GAO, *Program Evaluation: Key Terms and Concepts,* GAO-21-404SP (Washington, D.C.: March 2021). GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

We used information from State documents and interviews with officials to identify department-wide actions related to workplace diversity and inclusion. We sorted these actions by relevant steps that agencies can take to address each leading practice and provided our sorted list to State officials to review for comprehensiveness and accuracy.[4] We then used a scorecard methodology to determine the extent to which State's actions were consistent with the selected leading practices.[5] One GAO analyst assessed and identified State's actions and potential gaps for each step. Another analyst reviewed and confirmed the results of that assessment. The analysts used this assessment to independently rate the extent to which State's actions addressed individual steps using a three-point scale of "addressed" (actions addressed step with no identified gaps), "partially addressed" (actions may have worked to address step, but there were gaps), or "did not address" (no activities addressed step and there were gaps). The analysts then met to review their ratings and agreed upon a final score. In the case of disagreement, the two analysts met with a GAO methodologist to reach consensus on a final rating.

We assigned an overall rating to each leading practice based on the step ratings. Specifically, we assigned an overall rating of "addressed" when all steps were addressed, "generally addressed" when half of more of the steps were addressed, "partially addressed" when fewer than half of the steps were addressed, and "did not address" when all steps were not addressed. When all steps were partially addressed, we rated the overall leading practice "partially addressed." Although we reviewed steps taken, we did not assess the quality of implementation or effectiveness of these actions. See appendix II for the results of our assessment and rating of State's actions against diversity and inclusion leading practices and steps.

We also selected and surveyed State's employee organizations representing current staff to gather their perspectives on State's DEIA efforts. Specifically, we sent a questionnaire to 21 of State's 29 employee organizations whose interests we determined were directly related to

[4]We recently applied these leading practices and steps to assess diversity management efforts in the federal intelligence community. See GAO, *Intelligence Community: Additional Actions Needed to Strengthen Workforce Diversity Planning and Oversight*, GAO-21-83 (Washington, D.C.: December 2020).

[5]When relevant for this assessment, we included additional actions that we identified in State documents or through interviews with officials after State's review of the sorted list of actions.

DEIA.[6] Collectively, these organizations represent about 13,000 current Civil and Foreign Service and Locally Employed staff, according to State. We developed the questionnaire based on leading practices for diversity and inclusion management, among other things. We pretested the questionnaire with representatives from two employee organizations, and an independent survey specialist conducted a peer review of the questionnaire to minimize measurement error. Between December 2021 and January 2022, we sent the questionnaire electronically to 21 employee organizations and received responses from 20 of these organizations for an overall response rate of 95 percent. We sent the survey requesting that each employee organization identify a single point of contact on its leadership board to solicit input from other members and respond to the survey on behalf of the employee organization. See appendix III for the survey questions and results.

To evaluate the extent to which State has taken steps to identify, investigate, and eliminate barriers to workforce diversity since January 2020, we compared State's steps to U.S. Equal Employment Opportunity Commission (EEOC) guidance on conducting barrier analysis.[7] We determined that the information and communication component of internal controls was significant to this objective, along with the underlying principle that management should use quality information to achieve the entity's objectives.[8]

[6]We sent surveys to the following 21 organizations: Arab-Americans in Foreign Affairs Agencies; the Asian American Foreign Affairs Association; Balancing Act at State: Achieving Work-Life Balance; the Carl T. Rowan Chapter of Blacks in Government; the Civil Service Association; the Council for Career Entry Professionals; the Disability Action Group; Executive Women at State; the Foreign Service Families with Disabilities Alliance; Gays and Lesbians in Foreign Affairs Agencies; GRACE; the Hispanic Employees Council of Foreign Affairs Agencies; Jewish Americans and Friends in Foreign Affairs; Mosaic; the Native American Foreign Affairs Council; the Pickering and Rangel Fellows Association; Singles at State; the South Asian-American Employee Association; the Thursday Luncheon Group; Veterans at State; and Working in Tandem. We did not send surveys to the following employee organizations after determining that their interests are not directly related to DEIA issues: Associates of the American Foreign Service Worldwide; the Amateur Radio Club; the Ben Franklin Network; the Japan Exchange Teaching at State; the National War College Alumni Association; the Presidential Management Fellows Advisory Council; UP! State International Dance Collective; and Returned Peace Corps Volunteers.

[7]EEOC, *Equal Employment Opportunity Management Directive 715*, MD-715 (2003).

[8]GAO-14-704G.

We used information from State documents and interviews to determine the department-level steps State had taken since January 2020 to identify, investigate, and eliminate barriers to workforce diversity. Specifically, we reviewed State's reports to Congress, EEOC, and the Office of Personnel Management (OPM), including State's May 2021 report to Congress on how State responded to our recommendation to take additional steps to identify diversity issues in its workforce, and portions of State's fiscal year 2020 Management Directive 715 (MD-715) report.[9] We also reviewed State documentation to determine how State conducted its barrier analyses and whether the statistical methodology State used was sufficiently reliable to identify potential barriers to workforce diversity. Specifically, we assessed whether State's statistical methodology produced quality information to achieve the objective of identifying potential barriers to diversity. We did not independently assess State's workforce data to identify potential barriers to diversity nor did we assess the reliability of the data State used in its analyses. See appendix IV for more detail on our analysis of State's methodology for identifying potential barriers to diversity.

For both objectives, we interviewed officials from State, EEOC, and OPM. In particular, we interviewed State officials who are responsible for the department's DEIA efforts, including officials from the Office of Diversity and Inclusion, the Office of Civil Rights, and the Bureau of Global Talent Management. We also interviewed representatives from unions representing State's Civil and Foreign Service employees—the American Federation of Government Employees and the American Foreign Service Association, respectively. We interviewed officials from EEOC and OPM to obtain their perspectives on federal requirements related to managing diversity and inclusion in the workplace and identifying, investigating, and eliminating barriers to workforce diversity, as well as their perspectives on State's efforts in these areas.

We conducted this performance audit from April 2021 to July 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

[9]Department of State, *Report to Congress on Steps taken to Implement the Recommendation in the GAO report Additional Steps Are Needed to Identify Potential Barriers to Diversity (*GAO-20-237*) (Div. K, P.L. 116-260)*. State officials told us they were unable to provide all portions of the fiscal year 2020 MD-715 report because State was reviewing them for compliance with section 508 of the Rehabilitation Act.

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: GAO's Assessment of the Department of State's Actions to Address Leading Practices for Workforce Diversity and Inclusion Management

We compared the Department of State's diversity and inclusion actions to seven leading practices we identified for managing workforce diversity and inclusion. These include: employee involvement, diversity training, leadership commitment, recruitment, succession planning, measurement, and accountability (see table 13).[1] We rated the individual steps using a three-point scale of addressed (actions addressed step with no identified gaps), partially addressed (actions may have worked to address step, but there were gaps), or did not address (no activities addressed step and there were gaps). We assigned an overall rating to each leading practice based on ratings for underlying steps of "addressed" when all steps were addressed, "generally addressed" when half of more of the steps were addressed, "partially addressed" when fewer than half of the steps were addressed, and "did not address" when all steps were not addressed. When all steps were partially addressed, we rated the overall leading practice "partially addressed".

[1]GAO, *Diversity Management: Expert-Identified Practices and Agency Examples*, GAO-05-90 (Washington, D.C.: Jan. 14, 2005). In 2005, we reported on nine leading practices that we developed. For this review, we assessed whether State's actions were consistent with seven of the nine leading practices. We did not assess State's actions against the "Performance" leading practice because we determined that other leading practices encompassed performance. We also did not assess State's actions against the "Strategic Planning" leading practice because State was updating its diversity, equity, inclusion, and accessibility (DEIA) strategic plan during our review. We determined that diversity management in GAO-05-90 sufficiently encompasses inclusion.

Table 13: GAO's Assessment of Department of State's Diversity and Inclusion Efforts Compared to Leading Practices for Diversity and Inclusion Management

Leading practice	GAO overall rating	Steps GAO assessed for each leading practice	GAO step rating
Employee involvement: The contribution of employees in driving diversity throughout an organization.	Address	Employee resource groups or affinity groups	Address
Employee involvement: The contribution of employees in driving diversity throughout an organization.		Diversity and inclusion advisory council	Address
Employee involvement: The contribution of employees in driving diversity throughout an organization.		Encouragement of employee community outreach and involvement	Address
Employee involvement: The contribution of employees in driving diversity throughout an organization.		Mentoring and networking programs to develop and retain diverse personnel	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.	Address	Specialized diversity and inclusion education and training	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.		Diversity training for employees	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.		Diversity training for hiring and promotion panel participants	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.		Diversity training for senior leaders	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.		Team building, communication, decision-making, and conflict resolution training	Address
Diversity training: Organizational efforts to inform and educate management and staff about diversity.		Effectiveness assessment of diversity training	Address

Leading practice	GAO overall rating	Steps GAO assessed for each leading practice	GAO step rating
Leadership commitment: A vision of diversity demonstrated and communicated throughout an organization by top-level management.	Generally address	New or amended policies	Partially address
Leadership commitment: A vision of diversity demonstrated and communicated throughout an organization by top-level management.	Generally address	Policy statements, speeches, and plans	Address
Leadership commitment: A vision of diversity demonstrated and communicated throughout an organization by top-level management.	Generally address	Posts, statements, and information on the internal and external website	Address
Leadership commitment: A vision of diversity demonstrated and communicated throughout an organization by top-level management.	Generally address	Senior leader to champion diversity and inclusion efforts	Address
Recruitment: The process of attracting a supply of qualified, diverse applicants.	Generally address	A recruitment strategy	Address
Recruitment: The process of attracting a supply of qualified, diverse applicants.	Generally address	Partnerships with diverse academic institutions that have diverse student populations	Address
Recruitment: The process of attracting a supply of qualified, diverse applicants.	Generally address	Partnerships with diverse professional organizations	Address
Recruitment: The process of attracting a supply of qualified, diverse applicants.	Generally address	Effectiveness assessment of recruitment efforts	Partially address
Succession planning: An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	Generally address	Documented succession planning to ensure diverse leaders	Address
Succession planning: An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	Generally address	Diverse evaluators, reviewers, or assessors that comprise hiring and promotion panels	Address
Succession planning: An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	Generally address	Commitment to professional development of promotion candidates	Address
Succession planning: An ongoing, strategic process for identifying and developing a diverse pool of future leaders.	Generally address	Diverse pool of candidates identified for promotion	Partially address

Leading practice	GAO overall rating	Steps GAO assessed for each leading practice	GAO step rating
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Feedback from employee resource groups, affinity groups, or special emphasis groups	Address
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Assessment of employee perceptions of diversity and inclusion	Partially address
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Analysis of workforce composition data or trends	Partially address
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Use of performance measures based on reliable and accurate data	Do not address
Measurement: A set of quantitative and qualitative measures that assess the effect of various aspects of an overall diversity program.	Partially address	Holistic assessment of diversity and inclusion programs, plans, and policies	Partially address
Accountability: The means to ensure that leaders are responsible for diversity by linking their performance assessment to the progress of diversity initiatives.	Partially address	Diversity and inclusion performance objectives for managers and supervisors	Partially address
Accountability: The means to ensure that leaders are responsible for diversity by linking their performance assessment to the progress of diversity initiatives.	Partially address	Evaluation of managers and supervisors based on achievement of their diversity and inclusion goals	Partially address

Legend: For the overall rating: ●—Address: all steps addressed. ◑—Generally address: half or more of the steps addressed. ◔—Partially address: fewer than half of the steps addressed. ○—Do not address: all steps not addressed. For the step rating: ◖—Address. ➲—Partially address. ◡—Do not address.

Source: GAO analysis of State Department actions and GAO leading practices for diversity and inclusion management. | GAO-22-105182

Appendix III: Survey Results from Employee Organizations on Department of State's Diversity, Equity, Inclusion, and Accessibility Efforts

We selected and surveyed the Department of State's employee organizations from December 2021 to January 2022 to understand their perspectives on the department's diversity, equity, inclusion, and accessibility efforts. We received responses from 20 of the 21 groups to whom we sent the survey, for a total response rate of 95 percent.[1]

This appendix presents the results from our closed-ended questions. The total (n) shown for each question varies because some respondents selected "no basis to judge" and are not included in the total. Percentages may not add up to 100 due to rounding.

[1]State has 29 employee organizations. We selected the 21 groups whose interests we determined were directly related to DEIA issues.

1. **To what extent, if at all, do each of the following State leadership levels demonstrate a commitment to diversity?**

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Senior-level or political leadership[1] *(n=20)*	0% (0)	5% (1)	10% (2)	65% (13)	20% (4)
Bureau leadership[2] *(n=19)*	0% (0)	16% (3)	32% (6)	42% (8)	11% (2)
Managers and supervisors[3] *(n=19)*	0% (0)	37% (7)	37% (7)	26% (5)	0% (0)

2. **To what extent, if at all, do each of the following State leadership levels demonstrate a commitment to inclusion?**

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Senior-level or political leadership *(n=20)*	0% (0)	10% (2)	25% (5)	45% (9)	20% (4)
Bureau leadership *(n=19)*	0% (0)	16% (3)	42% (8)	32% (6)	11% (2)
Managers and supervisors *(n=19)*	0% (0)	37% (7)	42% (8)	21% (4)	0% (0)

3. **To what extent, if at all, do each of the following State leadership levels demonstrate a commitment to equity?**

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Senior-level or political leadership *(n=20)*	0% (0)	15% (3)	20% (4)	45% (9)	20% (4)
Bureau leadership *(n=19)*	0% (0)	26% (5)	37% (7)	26% (5)	11% (2)
Managers and supervisors *(n=19)*	11% (2)	21% (4)	53% (10)	16% (3)	0% (0)

4. **To what extent, if at all, do each of the following State leadership levels demonstrate a commitment to accessibility?**

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Senior-level or political leadership *(n=20)*	0% (0)	0% (0)	45% (9)	25% (5)	30% (6)
Bureau leadership *(n=18)*	0% (0)	17% (3)	44% (8)	28% (5)	11% (2)
Managers and supervisors *(n=18)*	6% (1)	17% (3)	44% (8)	28% (5)	6% (1)

[1]Senior leadership refers to senior-level or political leadership, including the Secretary, Deputy Secretaries, Under Secretaries, and Ambassadors-at-large.

[2]Bureau leadership refers to Assistant Secretaries and Deputy Assistant Secretaries.

[3]Managers and supervisors refers to Managing Directors or Directors, Deputy Directors, and Team Leads or Unit Chiefs.

5. **To what extent, if at all, does State evaluate the performance of the following managers and supervisors based on their progress toward achieving State's diversity and inclusion goals?**

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Civil Service managers and supervisors *(n=15)*	20% (3)	40% (6)	33% (5)	7% (1)	0% (0)
Foreign Service managers and supervisors *(n=15)*	7% (1)	47% (7)	33% (5)	13% (2)	0% (0)

6. **To what extent, if at all, does State hold the following managers and supervisors accountable for their progress toward achieving State's diversity and inclusion goals?**

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Civil Service managers and supervisors *(n=14)*	29% (4)	43% (6)	21% (3)	7% (1)	0% (0)
Foreign Service managers and supervisors *(n=15)*	33% (5)	33% (5)	20% (3)	13% (2)	0% (0)

7. **To what extent, if at all, do each of the following leadership levels solicit feedback from your EAG *[employee affinity group]* on relevant diversity and inclusion issues or efforts?**[4]

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Senior-level or political leadership *(n=19)*	0% (0)	11% (2)	47% (9)	32% (6)	11% (2)
Bureau leadership *(n=19)*	0% (0)	58% (11)	32% (6)	11% (2)	0% (0)

8. **When your EAG provides input or feedback regarding diversity and inclusion issues, how would your EAG rate follow-up by each of the following leadership levels?**

	Far short of our expectations	Somewhat short of our expectations	Meets our expectations	Somewhat exceeds our expectations	Far exceeds our expectations
Senior-level or political leadership *(n=19)*	11% (2)	32% (6)	32% (6)	21% (4)	5% (1)
Bureau leadership *(n=16)*	6% (1)	38% (6)	44% (7)	13% (2)	0% (0)

[4]At the time of our survey, State's 29 employee organizations consisted of two groups: 19 employee affinity groups and 10 employee organizations. In March 2022, State revised its policy to define both groups as "employee organizations." While the language in the questions refers to employee affinity groups, it encompasses the employee organizations.

9. To what extent, if at all, are the following State processes and opportunities equitable?

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Foreign Service assignments process *(n=16)*	13% (2)	44% (7)	38% (6)	6% (1)	0% (0)
Civil Service promotion process *(n=15)*	7% (1)	27% (4)	67% (10)	0% (0)	0% (0)
Foreign Service promotion process *(n=16)*	0% (0)	50% (8)	50% (8)	0% (0)	0% (0)
Civil Service professional development opportunities *(n=16)*	0% (0)	31% (5)	50% (8)	6% (1)	13% (2)
Foreign Service professional development opportunities *(n=17)*	0% (0)	18% (3)	71% (12)	6% (1)	6% (1)

10. How effective, if at all, is State in the following efforts to promote a diverse workforce that would include the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities?

	To no extent at all	To a small extent	To a moderate extent	To a great extent	To a very great extent
Recruiting a diverse Civil Service Workforce *(n=18)*	11% (2)	22% (4)	33% (6)	33% (6)	0% (0)
Recruiting a diverse Foreign Service Workforce *(n=18)*	22% (4)	11% (2)	39% (7)	28% (5)	0% (0)
Retaining a diverse Civil Service Workforce *(n=17)*	18% (3)	47% (8)	35% (6)	0% (0)	0% (0)
Retaining a diverse Foreign Service Workforce *(n=18)*	39% (7)	33% (6)	28% (5)	0% (0)	0% (0)

We also asked the following open-ended questions. We included summaries of these responses in the report when applicable.

- **From your EAG's perspective, what is State's biggest barrier to improving diversity and inclusion?**
- **From your EAG's perspective, what is the most important effort or action you think State should undertake to improve diversity and inclusion?**
- **What additional comments, if any, does your EAG have about any of State's diversity and inclusion efforts raised in this survey?**

Appendix IV: Analysis of the Department of State's Methodology for Identifying Potential Barriers to Diversity in Its Foreign Service Promotions

Summary of State's Methodology for Foreign Service Promotion Analysis

To determine whether actual promotion outcomes indicated any disparities based on race or ethnicity, State developed and applied its own statistical methodology to analyze Foreign Service promotion outcomes in response to our 2020 report. Our report identified statistically significant differences in adjusted promotion outcomes between historically disadvantaged racial or ethnic groups and Whites from class 4 to 3.[1] Specifically, to analyze promotion outcomes from 2016 through 2019, State took the following actions:

- Analyzed each year, each racial or ethnic group, and Foreign Service specialists and officers, separately.[2] Specifically, State analyzed promotions from class 4 to 3 of each racial or ethnic group for Foreign Service Officers and specialists from 2016 through 2019. State

[1]GAO-20-237. In our 2020 report, we did not identify class 4 to 3 promotions in the Foreign Service as the only disparity based on statistical significance in our adjusted promotion analysis. We presented both a descriptive promotion analysis and an adjusted promotion analysis. For the descriptive analysis, we calculated the percentage point difference and percentage difference in promotion rates for historically disadvantaged racial or ethnic groups. We did not test statistical significance for the descriptive analysis because State's promotion data is from the whole population and not a subject for a statistical significance test. For the adjusted analysis, we conducted discrete-time duration analysis using a logit model that controlled for a variety of factors relevant to promotion, and we analyzed the time duration (number of years) to be promoted. We tested statistical significance for the adjusted regression analysis to test estimated model coefficients. While statistical significance tests in regression models are useful as a diagnostic tool to test model coefficients, they may not be the only information sources agencies use to help identify disparities.

[2]State also analyzed generalists and specialists combined and racial or ethnic minority groups combined.

analyzed all officers as one competition group and analyzed specialists in multiple competition groups according to their skill. For specialists, State calculated different promotion rates across different racial or ethnic groups because the racial or ethnic population compositions were different across specialists' competition groups. State did not evaluate any other demographic characteristics such as gender or disability status in this analysis.

- Compared the actual promotion outcomes to their own expected number of promotions based on a statistical probability assumption known as binomial distribution for each racial and ethnic group.
  - State calculated their own expected number of promotions for people in each racial or ethnic group by dividing the total number of available promotion slots by the total number of qualified applicants, and then multiplied that result by the total number of qualified people in each racial or ethnic group in a given fiscal year.[3]
  - In statistics, binomial distribution is typically used when there are exactly two mutually exclusive outcomes of a trial, such as estimating the number of times a coin will land on heads versus tails. This means that State tested the assumption that each candidate independently and identically has the same probability of promotion when competing against each other in a particular fiscal year.
- Applied a statistical hypothesis test.
  - State used statistical hypothesis tests designed for sample estimates to determine whether the difference between actual promotion outcomes and their own expected number of promotions in each racial or ethnic group is statistically significant, and thus would merit further investigation.
  - A statistical hypothesis test is a method to test a "predetermined null hypothesis" (i.e., a declaration that there is no statistically significant difference between two variables, such as actual promotion outcomes and expected number of promotions). A test is considered to be statistically significant when the probability of

[3]State called these calculated promotion rates "fair share" for each racial or ethnic group.

obtaining a sample statistic is lower than a predetermined level of probability in the observed sample.[4]

State designed its barrier analysis methodology to detect statistically significant disparities. In State's methodology, a low probability value indicates evidence that a lower than expected promotion outcome for a particular race or ethnic group was statistically significant. State set the same thresholds for all racial or ethnic groups as less than 1 percent of probability values to be "very strong evidence," lower than 5 percent of probability values to be "strong evidence," probability values between 5 percent and lower than 10 percent to be "weak evidence," and probability values 10 percent or higher to be "insufficient evidence."[5]

Table 14 illustrates an example of State's analysis for Foreign Service Officer promotions in fiscal year 2016.[6]

Table 14: Example of the Department of State's Promotion Analysis by Ethnic or Racial Group for Career Foreign Service Officers from Class 4 to 3, Fiscal Year 2016

Racial or ethnic group	Number of candidates	Actual promotion rate	Expected promotion rate	Actual promotion outcome	Expected promotions	Difference from expected promotion	Probability from State's statistical hypothesis test	Evidence of lower promotions
Racial/ethnic minority	255	33%	38%	83	97.0	-14.0	4%	Strong Evidence
African American	64	28%	38%	18	24.4	-6.4	6%	Weak Evidence
Asian	71	28%	38%	20	27.0	-7.0	5%	Weak Evidence
Multirace	60	33%	38%	20	22.8	-2.8	27%	Insufficient Evidence

[4]When conducting a statistical hypothesis test, there are two possible decisions: reject the null hypothesis or fail to reject the null hypothesis. If a test fails to reject the null hypothesis, there is not a conclusive decision (or "the decision is inconclusive"). Hypothesis testing uses data from a sample to make an inference about a population. Statistical significance is directly affected by sample size. In statistics, the larger a sample size for an estimate the smaller standard errors the estimate has, which indicates better precision of the estimate.

[5]In addition to these thresholds, State also used a category "not enough data" for instances in which there were zero qualified candidates in a particular racial or ethnic group.

[6]We chose the State's fiscal year 2016 promotion analysis as an example because it shows all possible strong, weak, and insufficient evidence determinations by State in the same year's analysis.

Racial or ethnic group	Number of candidates	Actual promotion rate	Expected promotion rate	Actual promotion outcome	Expected promotions	Difference from expected promotion	Probability from State's statistical hypothesis test	Evidence of lower promotions
Unspecified	16	63%	38%	10	6.1	3.9	99%	Insufficient Evidence
White	780	40%	38%	309	296.8	12.2	83%	Insufficient Evidence
Hispanic	63	41%	38%	26	24.0	2.0	75%	Insufficient Evidence
Not Hispanic	933	38%	38%	353	355.0	-2.0	46%	Insufficient Evidence

Source: Department of State. | GAO-22-105182

Notes: Some groups from State's analysis are not included in this table because we determined the size of the group was too small to ensure anonymity.

The racial/ethnic minority group includes Hispanic candidates and all other racial groups except White-non-Hispanic and unspecified-non-Hispanic candidates. The White and unspecified racial groups include both White-non-Hispanic and White-Hispanic, and both unspecified-non-Hispanic and unspecified-Hispanic candidates.

Row one of table 14 indicates that State reviewed a total of 255 qualified officers at the class 4 who were racial or ethnic minority candidates in fiscal year 2016. Based on State's expected 38 percent promotion rate for officers at the class 4 in fiscal year 2016, racial or ethnic minorities in this competition group were expected to have 97 promotions. However, the actual outcome for the group was 83 promotions, which is 14 fewer slots than expected. The 4 percent probability value from its statistical hypothesis test based on binomial distribution is statistically significant, so State categorizes the difference between the actual promotion outcome and the expected promotion number as strong evidence of disparity.

Of 64 African American officers candidates reviewed at the class 4 (a subset of the 255 qualified racial or ethnic minority candidates), 18 candidates were promoted, which is 6 less than State expected. The subsequent probability value of 6 percent led State to conclude there was weak evidence of disparity.

Using this statistical methodology for each racial or ethnic group separately from fiscal years 2016 to 2019, State concluded that there was not a clear and consistent disparity in promotions from Foreign Service class 4 to 3 for specialists or officers, because most of these tests indicate "insufficient evidence." State is using a similar statistical methodology to analyze demographic data on Civil Service applicants to determine whether there is any potential bias in how State qualifies and selects job candidates.

Assessment of the Effect of the Methodology on the Foreign Service Promotion Barrier Analysis

We found four key weaknesses in State's statistical methodology that limited State's ability to identify disparities that indicate potential barriers:

1. State's promotion analysis relies on statistical significance rather than the magnitude of disparity between the expected number of promotions and actual promotions. As a result, State could only identify extreme disparities as indicators of potential barriers to promotion. Statistical significance tests like the one State used are applied to assess whether the actual outcomes would be unlikely to occur from random chance.[7] Such tests do not necessarily determine whether the magnitude of disparity used in the test is meaningful.

   The statistical hypothesis test designed for sampling estimates that State used in its promotion analysis was directly affected by sample size and greatly reduced its ability to detect meaningful disparities in promotion outcomes, given the small size of the population in State's analysis. A meaningful disparity in this context, for example, could be a disparity that indicates whether State is achieving goals related to eliminating barriers to equal participation at all levels of their workforce as required by EEOC. Therefore, such a statistical significance test would require a larger magnitude of disparity between the actual and expected number of promotions in order to reach the predetermined confidence level. As a result, State could only detect extreme disparities as indicators of potential barriers to promotion.

2. State applied a statistical hypothesis test designed for sampling data to estimate results for an entire population. This was not an appropriate method because State had promotion outcome data for the entire population of candidates and therefore did not need a methodology to account for sampling precision. Doing so made it more difficult to identify promotion disparities for less represented racial or ethnic groups.

   Specifically, since historically disadvantaged racial or ethnic groups make up smaller proportions of State's Foreign Service workforce, State's methodology required greater promotion disparities for those groups to identify as potential barriers. For example, as shown in table

[7]A statistical hypothesis test rejects the null hypothesis if probability of actual outcomes is lower than the preset level of probability (typically 5 or 10 percent). The 5 percent (10 percent) probability constructs 95 percent (90 percent) confidence level.

15, even when three groups have the same expected and actual promotion rates, State's methodology would find insufficient evidence of disparity for the smallest group but very strong evidence of disparity for the largest group.

Table 15: Hypothetical Example of the Department of State's Methodology for Identifying Promotion Disparities Across Different Sized Groups

Racial or ethnic group	Number of candidates	Actual promotion rate	Expected promotion rate	Actual promotion outcome	Expected promotions	Difference from expected promotion	Probability from State's statistical hypothesis test	Evidence of lower promotions
Group 1	50	30%	38%	15	19	-4	15%	Insufficient Evidence
Group 2	100	30%	38%	30	38	-8	6%	Weak Evidence
Group 3	250	30%	38%	75	95	-20	1%	Very Strong Evidence

Source: GAO analysis. | GAO-22-105182

Note: State's thresholds for evidence are: 1 percent of probability values is "very strong evidence;" lower than 5 percent of probability values is "strong evidence;" probability values between 5 percent and lower than 10 percent is "weak evidence;" and probability values 10 percent or higher is "insufficient evidence."

3. State compared the actual promotion outcomes to their own expected number of promotions using a binomial distribution, so State's analysis did not take into account other factors that can influence promotion outcomes.[8] State's promotion process is complicated and numerous factors, such as education level and serving in hardship assignments, could also affect a candidate's likelihood of promotion. Therefore, it would be almost impossible to determine the complete shape of the probability distribution that represents State's promotion process and use such a predetermined probability distribution as an underlying assumption.[9] By not taking other factors into account, State may have miscalculated promotion outcome disparities.

   Instead of assuming a certain type of probability distribution, we used multivariate statistical models in our 2020 report to assess promotion

[8]State's methodology considered race and ethnicity in assessing promotion outcomes by analyzing each racial or ethnic group separately. It controlled for promotion eligibility because State's promotion data only included those who were eligible for promotion, which requires that candidates meet certain criteria such as particular skills, years of service, and class level.

[9]The shape of the probability distribution represents all possible outcomes and associated probabilities. In order to determine the shape of probability distribution for State's promotion process, State would need to determine each specific probability for each associated possible outcome after accounting for all potential factors.

outcomes using 17 years of promotion data. In the statistical models, we decomposed employees' annual class information into length of time for promotion at the individual level. In order to account for various factors associated with the promotion process, our models also controlled for individual level variables such as occupations, education level, serving in hardship assignments, and having long-term leave that could also affect a candidate's likelihood of promotion.

4. State compared the actual promotion outcomes to their own expected number of promotions for each racial or ethnic group separately, thus overlooking the mutually exclusive nature of promotion outcomes. For example, in 2016, people from racial or ethnic minority groups had 14 fewer promotions than State expected, while Whites had 12 more promotions than State expected.[10] The actual differences in promotion outcomes between people from racial or ethnic minority groups and Whites would be about 26 (14+12) because one candidate's promotion outcome affects the promotion outcomes of the other candidates: when one person is promoted, there is one less opportunity for the remaining candidates. However, State's methodology only took into account the fact that the racial or ethnic minority group had 14 fewer promotion slots than State expected. As a result, State understated the magnitude of promotion disparities.

Table 16 shows that racial or ethnic minorities had a total of 20 fewer promotions compared to State's expected promotions from fiscal years 2016 through 2019, while Whites and the unspecified group had 21 more promotions than expected. The table also shows that 3 out of 4 years of promotion cycle outcomes indicate that racial or ethnic minorities had fewer promotions than expected.

Table 16a: Department of State's Promotion Analysis by Ethnic or Racial Group for Career Foreign Service Employees from Class 4 to 3, Fiscal Years 2016-2019

Racial or ethnic group	Year	Number of candidates	Actual promotion outcome	Expected promotions	Difference from expected promotion	Probability from State's statistical hypothesis test	Evidence of lower promotions
Racial/ethnic minority	2016	549	154	172.1	-18.1	0.05	Weak Evidence
Racial/ethnic minority	2017	539	139	146.7	-7.7	0.25	Insufficient Evidence

[10]Whites in State's analysis includes both White-non-Hispanic and White-Hispanic employees.

Racial or ethnic group	Year	Number of candidates	Actual promotion outcome	Expected promotions	Difference from expected promotion	Probability from State's statistical hypothesis test	Evidence of lower promotions
Racial/ethnic minority	2018	524	158	149.9	8.1	0.80	Insufficient Evidence
Racial/ethnic minority	2019	489	168	170.4	-2.4	0.43	Insufficient Evidence
Subtotal		**2101**	**619**	**639.1**	**-20.1**		

Table 16b: Department of State's Promotion Analysis by Ethnic or Racial Group for Career Foreign Service Employees from Class 4 to 3, Fiscal Years 2016-2019

Racial or ethnic group	Year	Number of candidates	Actual promotion outcome	Expected promotions	Difference from expected promotion	Probability from State's statistical hypothesis test	Evidence of lower promotions
White	2016	1442	482	467.0	15.0	0.81	Insufficient Evidence
White	2017	1374	396	394.1	1.9	0.56	Insufficient Evidence
White	2018	1328	389	399.1	-10.1	0.28	Insufficient Evidence
White	2019	1229	471	467.3	3.7	0.60	Insufficient Evidence
Unspecified	2016	48	19	15.3	3.7	0.90	Insufficient Evidence
Unspecified	2017	30	8	7.4	0.6	0.69	Insufficient Evidence
Unspecified	2018	24	10	6.4	3.6	0.96	Insufficient Evidence
Unspecified	2019	17	7	4.7	2.3	0.93	Insufficient Evidence
Subtotal		**5492**	**1782**	**1761.3**	**20.7**		

Source: GAO analysis of Department of State documentation. | GAO-22-105182

Note: The racial/ethnic minority group includes Hispanic candidates and all racial groups except White-non-Hispanic and unspecified-non-Hispanic candidates. The White and unspecified groups include both White-non-Hispanic and White-Hispanic, and both unspecified-non-Hispanic and unspecified-Hispanic candidates.

Appendix V: Department of State's Responsibilities under Executive Order 14035

In June 2021, Executive Order 14035 on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce directed agencies to conduct a preliminary assessment of their diversity, equity, inclusion, and accessibility (DEIA) efforts by October 2021 and develop a DEIA strategic plan by March 2022.[1] Agencies are responsible for reporting annually on progress in implementing their strategic plans. The remaining requirements do not have associated deadlines or timeframes (see table 17).

Table 17: Overview of Department of State's Responsibilities under Executive Order 14035

Responsibility	Description
Make DEIA a priority component of agency agenda and strategic planning	Make advancing diversity, equity, inclusion, and accessibility (DEIA) a priority component of the agency's management agenda and agency strategic planning. Implement the government-wide DEIA Plan and such other related guidance as issued by the Office of Personnel Management (OPM) of the Office of Management and Budget (OMB).
Preliminary assessment	By October 4, 2021, submit to the Assistant to the President for Domestic Policy (APDP), OPM, and OMB a preliminary assessment of the current state of DEIA in the agency's human resources practices and workforce composition.
Agency DEIA Strategic Plan	By March 23, 2022, develop and submit to the APDP, OPM, and OMB a DEIA strategic plan that identifies actions to advance DEIA in the workforce, and remove any potential barriers to DEIA in the workforce identified in the preliminary assessment. The plans should include quarterly goals and actions to advance DEIA initiatives in the agency's workforce and workplace culture.
Annual progress reports	On an annual basis, report to the President on the status of the agency's efforts to advance DEIA within the agency, and the agency's success in implementing the Agency DEIA Strategic Plan. Make available to the general public information on the agency's efforts to advance DEIA in the agency's workforce.
Provide resources to implement the Agency DEIA Strategic Plan	Oversee, and provide resources and staffing to support, the implementation of the Agency DEIA Strategic Plan.
Enhance DEIA	Enhance DEIA within the agency, in collaboration with the agency's senior officials and consistent with applicable law and merit system principles.

[1]Exec. Order. No. 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86 Fed. Reg. 34593 (June 25, 2021). The Executive Order required agencies to develop a DEIA strategic plan within 120 days after the issuance of the government-wide DEIA plan, which was due by and issued on November 23, 2021. Thus, the deadline for agency DEIA plans was March 23, 2022.

Responsibility	Description
Seek opportunities to establish a Chief Diversity and Inclusion Officer	Seek opportunities to establish a position of chief diversity officer or diversity and inclusion officer (as distinct from an equal employment opportunity officer), with sufficient seniority to coordinate efforts to promote DEIA within the agency.
Consider hiring DEIA experts	Strongly consider for employment, to the extent permitted by applicable law, qualified applicants of any background who have advanced DEIA in the workplace.
Integrate DEIA into broader agency planning	In coordination with the OMB, seek opportunities to ensure alignment across various organizational performance planning requirements and efforts by integrating the Agency DEIA Strategic Plan and DEIA goals into certain broader agency strategic and performance planning efforts.
Take a data-driven approach to advancing DEIA	Take a data driven approach to advancing policies that promote DEIA within the agency's workforce, while protecting the privacy of employees and safeguarding all personally identifiable information and protected health information.
Measure workforce demographic representation and trends	Using federal standards governing the collection, use, and analysis of demographic data, measure demographic representation and trends related to diversity in the agency's overall workforce composition, senior workforce composition, employment applications, hiring decisions, promotions, pay and compensation, professional development programs, and attrition rates.
Implement revised demographic data collection guidance	Implement any revised demographic data collection guidance issued under the order to expand the collection of voluntarily self-reported demographic data, once any such guidance is issued, and take steps to ensure that data collection and analysis practices allow for the capture or presence of multiple attributes and identities to ensure an intersectional analysis.
Increase DEIA on advisory groups	Collect and analyze voluntarily self-reported demographic data regarding the membership of advisory committees, commissions, and boards in a manner consistent with applicable law, and with statistical standards where applicable.
Measure and report progress in promoting paid internships	As part of the annual reporting process on the status of agency DEIA efforts, measure and report on the agency's progress with respect to guidance on promoting paid internships and similar programs in the federal government.
Measure and report on agency Partnership Initiative progress	Work with the Office of Science and Technology Policy, OPM, and OMB to make employment, internship, fellowship, and apprenticeship opportunities available through the Partnerships Initiative, and take steps to enhance recruitment efforts through the initiative as part of the agency's overall recruitment efforts. Measure and report on the agency's progress on carrying out this responsibility as part of the annual reporting process.
Implement guidance on professional development and advancement	Implement guidance for tracking demographic data relating to participation in leadership and professional development programs and development opportunities, and use the collected data to identify ways to improve outreach and recruitment for professional development programs, consistent with merit system principles. Address any barriers to access to or participation in such programs faced by members of underserved communities.
Implement DEIA training and learning	Take steps to implement or increase the availability and use of DEIA training programs for employees, managers, and leadership. Such training programs should enable employees, managers, and leaders to have knowledge of systemic and institutional racism and bias against underserved communities, be supported in building skillsets to promote respectful and inclusive workplaces and eliminate workplace harassment, have knowledge of agency accessibility practices, and have increased understanding of implicit and unconscious bias.
Maximize agency workplace accessibility	Maximize the accessibility of the physical environment of the agency's workplaces, consistent with applicable law and the availability of appropriations, to reduce the need for reasonable accommodations, and provide periodic notice to all employees that complaints concerning accessibility barriers in federal buildings can be filed with the Access Board.

Responsibility	Description
Ensure equitable support services for LGBTQ+ employees	In coordination with OPM, ensure that existing employee support services equitably serve lesbian, gay, bisexual, transgender, queer, and others (LGBTQ+) employees, including, as appropriate, through the provision of supportive services for transgender and gender nonconforming and nonbinary employees who wish to legally, medically, or socially transition.
Ensure equitable access to benefits for LGBTQ+ employees	In coordination with OPM, ensure that the federal government equitably provides insurance coverage options and employee benefits for LGBTQ+ employees (including beneficiaries and eligible dependents), LGBTQ+ beneficiaries, and LGBTQ+ eligible dependents, including long-term care insurance, sick leave, and life insurance. This includes ensuring that federal benefits, programs, and services recognize the diversity of family structures.
Foster an inclusive environment for all genders	In coordination with OPM, take steps to foster an inclusive environment where all employees' gender identities are respected, such as including, where applicable, nonbinary gender marker and pronoun options in federal hiring, employment, and benefits enrollment forms.
Update agency identification standards	In consultation with OPM, update federal employee identification standards to include nonbinary gender markers where gender markers are required in employee systems and profiles, and shall take steps to reduce any unnecessary administrative burden for transgender and gender nonconforming and nonbinary employees to update their gender markers and pronouns in employee systems and profiles, where applicable.
Explore opportunities to expand the availability of gender nonbinary facilities	Explore opportunities to expand the availability of gender nonbinary facilities and restrooms in federally owned and leased workplaces.

Source: GAO analysis of Executive Order 14035. | GAO-22-105182

Note: According to OPM officials, OPM, U.S. Equal Employment Opportunity Commission (EEOC), and OMB have not issued guidance on expanding the collection of voluntarily self-reported demographic data; OPM and OMB have not issued guidance with respect to promoting paid internships; the Partnership Initiative has not been initiated; and OPM and OMB have not issued guidance for tracking demographic data relating to participation in leadership and professional development programs.

Appendix VI: Comments from the Department of State

United States Department of State
Comptroller
Washington, DC 20520

JUL 11 2022

Thomas Melito
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Mr. Melito:

We appreciate the opportunity to review your draft report, "STATE DEPARTMENT: Additional Actions Needed to Improve Workplace Diversity and Inclusion" GAO Job Code 105182.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

Sincerely,

William B. Davisson (Acting)

Enclosure:
As stated

cc: GAO – David Hinchman
GTM – Phillipe Lussier
OIG - Norman Brown

Department of State Comments on GAO Draft Report

STATE DEPARTMENT: Additional Actions Needed to Improve Workplace Diversity and Inclusion

(GAO-22-105182, GAO Code 105182)

Thank you for the opportunity to comment on the GAO draft report, "*State Department: Additional Actions Needed to Improve Workplace Diversity and Inclusion*." These comments respond to GAO's recommendations for the Department of State, listed below.

Recommendation 1: The Secretary of State should ensure the Office of Diversity and Inclusion establishes performance measures for State's DEIA-related goals and objectives in the workplace and develop a process to evaluate progress.

Department Response: The Department concurs with this recommendation. Led by the Secretary's Office of Diversity and Inclusion, the Department has formed an 'Implementation Team' to oversee progress and establish performance measures for the recently completed DEIA Strategic Plan and a DEIA Data Working Group to oversee barrier analysis projects with enterprise-wide implications and identify potential barriers to equal opportunity.

The DEIA Data Working Group and the Implementation Team will identify which DEIA initiatives can be quantifiably tracked, establish baseline data where needed, and create outcome targets for overarching DEIA priorities to the extent allowed under law. As required for the DEIA Strategic Plan, the Department will submit annual progress updates for its DEIA program, including operational activity and outcome measures, to the Office of Personnel Management.

Additional Comments:

- The draft report does not reference the Department's FY 2022-2026 Joint Strategic Plan (JSP), released on March 28, 2022, which includes a strategic objective and agency priority goal addressing the elimination of barriers to equity, implementation of targeted recruitment and retention efforts, and putting in place provisions for DEIA accountability. We recommend that GAO include an acknowledgement of the JSP and the supporting strategic objective and joint DEIA Agency Priority Goal in the section "State is

2

Generally Addressing Leadership Commitment and Has Plans to Address Gaps" starting on page 12.

Recommendation 2: The Secretary of State should develop and implement additional actions to enhance accountability for workplace DEIA goals, including for managers and supervisors, such as analyzing the effectiveness of accountability mechanisms.

Department Response: The Department concurs with this recommendation. In 2023, State will implement its updated Civil Service performance management system Department-wide. The new system will include DEIA-specific competency requirements; managers and supervisors will be rated on their commitment to promoting DEIA principles through a new mandatory performance goal. This will enable State to establish a baseline for how Civil Service employees adhere to competencies with DEIA related components and to assess the commitment of rating officials in embracing best management practices, which include promoting DEIA standards.

The Department also issued new decision criteria for Foreign Service tenure and promotion (Core Precepts), which includes performance objectives for diversity and inclusion, including exhibiting cultural awareness, achieving goals through inclusive teamwork, showing support for workplace flexibilities, organizing programs and events to discuss actionable ways to advance diversity, and working to ensure the workplace is accessible. The Core Precepts reflect the competencies determined to be the most critical to successful service throughout a Foreign Service career and comprise the most important competencies in which potential must be demonstrated to advance. Department raters will use these new Core Precepts to establish work requirements and specific goals for all Foreign Service employees for the rating cycle beginning in April 2022.

Recommendation 3: The Secretary of State should create a plan to improve State's barrier analysis process that ensures all steps of the process are followed.

Department Response: The Department concurs with this recommendation. Led by the Secretary's Office of Diversity and Inclusion, the Department has formed an 'Implementation Team' to oversee progress and establish performance measures

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for the recently completed DEIA Strategic Plan and a DEIA Data Working Group to oversee barrier analysis projects with enterprise-wide implications and identify potential barriers to equal opportunity. The DEIA Data Working Group is undertaking a new series of rigorous barrier analyses that conform to U.S. Equal Employment Opportunity Commission (EEOC) guidance. The Department will also focus on effective implementation of the recommendations that emerge from these barrier analyses. The Department will continue to work with GAO and investigate applicable metrics to advance DEIA, as allowed by governing law and regulations.

Recommendation 4: The Secretary of State should improve the agency's statistical methodology to ensure it is appropriate for identifying potential barriers to diversity.

Department Response: The Department concurs with this recommendation. We continue to mature our barrier analysis methodology and are applying lessons learned from past projects as well as U.S. Equal Employment Opportunity Commission (EEOC) training to current barrier analysis projects. As the Department improves its statistical methodology for the quantitative aspect of barrier analyses, the Department is also enhancing the important qualitative aspect of these analyses. The Department will continue to work with stakeholders to investigate applicable metrics to advance DEIA, as allowed by governing law and regulations.

Accessible Text for Appendix VI: Comments from the Department of State

JUL 11 2022

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Managing Director
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Department of State Comments on GAO Draft Report

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The Department will continue to work with stakeholders to investigate applicable metrics to advance DEIA, as allowed by governing law and regulations.

Appendix VII: GAO Contacts and Staff Acknowledgments

GAO Contact

Jason Bair, (202) 512-6881, bairj@gao.gov

Staff Acknowledgments

In addition to the contact named above, Cheryl Goodman (Assistant Director), Bridgette Savino, Rianna Jansen, Moon Parks, Terry Richardson, John Hussey, Neil Doherty, and Larissa Barrett made key contributions to this report. In addition, Alexander Welsh, Clifton G. Douglas, Jr., and Elizabeth Marin provided technical assistance.

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