

GAO

Report to the Ranking Minority Member,
Committee on Homeland Security and
Governmental Affairs, U.S. Senate

January 2005

DIVERSITY
MANAGEMENT

Expert-Identified
Leading Practices and
Agency Examples



G A O

Accountability * Integrity * Reliability



Highlights of [GAO-05-90](#), a report to the Ranking Minority Member, Committee on Homeland Security and Governmental Affairs, U.S. Senate

Why GAO Did This Study

A high-performance organization relies on a dynamic workforce with the requisite talents, multidisciplinary knowledge, and up-to-date skills to ensure that it is equipped to accomplish its mission and achieve its goals. Such organizations typically (1) foster a work environment in which people are enabled and motivated to contribute to mission accomplishment and (2) provide both accountability and fairness for all employees. To accomplish these objectives, high-performance organizations are inclusive, drawing on the strengths of employees at all levels and of all backgrounds—an approach consistent with diversity management. For purposes of our review, diversity management is defined as a process intended to create and maintain a positive work environment where the similarities and differences of individuals are valued, so that all can reach their potential and maximize their contributions to an organization's strategic goals and objectives.

As part of a request that GAO report on the federal government's performance in managing its diverse workforce, GAO was asked to identify (1) leading diversity management practices and (2) examples of the identified practices in the federal government.

This report contains no recommendations.

www.gao.gov/cgi-bin/getrpt?GAO-05-90.

To view the full product, including the scope and methodology, click on the link above. For more information, contact George H. Stalcup on (202) 512-9490 or at stalcupg@gao.gov.

DIVERSITY MANAGEMENT

Expert-Identified Leading Practices and Agency Examples

What GAO Found

Of the experts in the field of diversity management we spoke with or whose publications we reviewed to identify leading diversity management practices, a majority cited the following nine practices as leading.

- **Top leadership commitment**—a vision of diversity demonstrated and communicated throughout an organization by top-level management.
- **Diversity as part of an organization's strategic plan**—a diversity strategy and plan that are developed and aligned with the organization's strategic plan.
- **Diversity linked to performance**—the understanding that a more diverse and inclusive work environment can yield greater productivity and help improve individual and organizational performance.
- **Measurement**—a set of quantitative and qualitative measures of the impact of various aspects of an overall diversity program.
- **Accountability**—the means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives.
- **Succession planning**—an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization's potential future leaders.
- **Recruitment**—the process of attracting a supply of qualified, diverse applicants for employment.
- **Employee involvement**—the contribution of employees in driving diversity throughout an organization.
- **Diversity training**—organizational efforts to inform and educate management and staff about diversity.

Experts and the literature generally agree that a combination of the identified practices should be considered when an organization is developing and implementing diversity management. We selected 10 agencies with the highest summary rankings from a 1999 governmentwide survey of federal agencies' diversity management programs to review for examples of the implementation of the identified practices. The implementation of the leading practices by these agencies may provide insights to other agencies as they undertake or attempt to strengthen or improve their own diversity management initiatives.

We provided a draft of this report to the Equal Employment Opportunity Commission and the U.S. Office of Personnel Management for review and comment. In their comments, agency officials generally agreed with the findings of the draft report.

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Abbreviations

| | |
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| ADA | Americans with Disabilities Act |
| BOP | Federal Bureau of Prisons |
| CEO | Chief Executive Officer |
| DAB | Diversity Advisory Board |
| EAS | Executive Administrative Service |
| EEO | equal employment opportunity |
| EEOC | U.S. Equal Employment Opportunity Commission |
| FAA | Federal Aviation Administration |
| FDA | Food and Drug Administration |
| NIH | National Institutes of Health |
| NIST | National Institute of Standards and Technology |
| NOAA | National Oceanic and Atmospheric Administration |
| NPR | National Partnership for Reinventing Government |
| NOBCCHE | National Organization of Black Chemists and Black Chemical Engineers |
| OEODM | Office of Equal Opportunity and Diversity Management |
| OPM | U.S. Office of Personnel Management |
| PCES | Postal Career Executive Service |
| SEA | Science and Engineering Alliance |
| SES | Senior Executive Service |
| SFA | Survey Feedback Action |
| VA | Department of Veterans Affairs |
| VHA | Veterans Health Administration |

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United States Government Accountability Office
Washington, D.C. 20548

January 14, 2005

The Honorable Joseph I. Lieberman
Ranking Minority Member
Committee on Homeland Security
and Governmental Affairs
United States Senate

Dear Senator Lieberman:

A high-performance organization relies on a dynamic workforce with the requisite talents, multidisciplinary knowledge, and up-to-date skills to ensure that it is equipped to accomplish its mission and achieve its goals. Such organizations typically foster a work environment in which people are enabled and motivated to contribute to continuous learning and improvement as well as mission accomplishment. Such organizations also provide both accountability and fairness for all employees. In addition, the approach that a high-performance organization takes toward its workforce is inclusive and draws on the strengths of employees at all levels and of all backgrounds. This approach is consistent with that of diversity management. For purposes of our review, diversity management is a process intended to create and maintain a positive work environment where the similarities and differences of individuals are valued, so that all can reach their potential and maximize their contributions to an organization's strategic goals and objectives.

This report responds, in part, to your request that we report on the federal government's performance in managing its diverse workforce. Our objectives were to identify (1) leading diversity management practices and (2) examples of how federal agencies implement the identified practices in the federal government. To identify leading diversity management practices, we first reviewed literature on diversity management. We then met with various federal officials and experts in the field of diversity management.¹ We identified as leading those diversity management practices that a majority of experts cited in interviews or publications as leading practices, best practices, or components of a successful diversity initiative. We recognize that other experts may have identified other practices and are not suggesting that this list is exhaustive. We did not

¹Appendix I discusses the criteria used to identify experts recognized in diversity management, and appendix III contains a list of the recognized experts.

evaluate the effectiveness of the cited practices, although many of these practices are consistent with practices identified in prior GAO reports on human capital management.²

To identify agency examples of leading practices in the federal government, we reviewed diversity management literature and met with officials from the National Academy of Public Administration and others who directed us to agencies that may have implemented some of the expert-identified practices. Through our literature search, we located a 2001 paper³ that ranked federal agencies' diversity management programs based on results from a 1999 governmentwide survey, which was administered to 160 agencies and subagencies that represented more than 80 percent of the federal civilian workforce.⁴ We used this paper for selecting federal agencies because (1) it employed a systematic methodological approach for gauging agencies' diversity management programs and (2) we found no other research subsequent to the paper that assessed agencies' diversity management programs using a systematic methodological approach that covered a large number of agencies and subagencies. Using the rankings in that paper, we selected the 10 agencies with the highest summary rankings

²See, for example, GAO, *A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002); GAO, *Management Reform: Elements of Successful Improvement Initiatives*, T-GGD-00-26 (Washington, D.C.: Oct. 15, 1999); GAO, *Senior Executive Service: Enhanced Agency Efforts Needed to Improve Diversity as the Senior Corps Turns Over*, [GAO-04-123T](#) (Washington, D.C.: Oct. 15, 2003).

³J. Edward Kellough and Katherine C. Naff, "Managing Diversity in the Federal Service: An Examination of Agency Programs," paper prepared for presentation at the Sixth National Public Management Research Conference, October 18-20, 2001, School of Public and Environmental Affairs, Indiana University, Bloomington, Indiana. Subsequently, the paper was published as an article—J. Edward Kellough and Katherine C. Naff, "Responding to a Wake-Up Call: An Examination of Federal Agency Diversity Management Programs," *Administration & Society*, Vol. 36, No. 1 (2004), pp. 62-90.

⁴The survey was conducted by the National Partnership for Reinventing Government's Diversity Task Force. See appendix I for more details.

to examine in more detail.⁵ These agencies—in the ranked order cited in the paper, starting with the highest—were the U.S. Coast Guard, National Institute of Standards and Technology (NIST), the Department of Veterans Affairs (VA),⁶ Federal Bureau of Prisons (BOP), U.S. Postal Service, National Oceanic and Atmospheric Administration (NOAA), Veterans Health Administration (VHA), Food and Drug Administration (FDA), Federal Aviation Administration (FAA), and National Institutes of Health (NIH). Officials from these 10 agencies also provided documents that illustrated their agencies’ diversity management efforts, including the expert-identified practices. The agency examples of diversity management practices in this report do not represent all the potential ways that an agency could implement diversity management initiatives or address the specific diversity management practice being discussed. We did not evaluate the effectiveness of each agency’s implementation of the practices, and the fact that an agency is profiled to illustrate the implementation of a particular diversity management practice is not meant to imply agency success or lack of success in the implementation of other diversity management practices or diversity management overall.

We did our work in Washington, D.C., between July 2003 and October 2004, in accordance with generally accepted government auditing standards. Details of our scope and methodology are in appendix I.

Results in Brief

Of the experts in the field of diversity management we spoke with or whose publications we reviewed to identify leading diversity management practices, a majority cited the nine practices in figure 1 as leading.

⁵As discussed with the requester’s office, because of the recent passage of the Department of Defense human capital legislation and other legislation giving the Department of Defense the authority to carry out a pilot program to improve its equal employment opportunity complaint process, we did not include any Department of Defense agencies in our review. Under the latter legislation, GAO is to evaluate the pilot. Therefore, although the Office of the Secretary of the Army was ranked tenth on the Kellough-Naff list, it was not included in our review. Also, according to an official from the Department of Veterans Affairs, the Veterans Benefits Administration, which was ranked fourth on the Kellough-Naff list, was in transition and had just started its new diversity effort after “bringing in new people.” The top 10 agencies selected reflect the omission of these 2 agencies from their original ranking in the Kellough-Naff list.

⁶The paper identified only VA headquarters.

Figure 1: Leading Diversity Management Practices Identified by a Majority of Experts

- **Top leadership commitment**—a vision of diversity demonstrated and communicated throughout an organization by top-level management.
- **Diversity as part of an organization’s strategic plan**—a diversity strategy and plan that are developed and aligned with the organization’s strategic plan.
- **Diversity linked to performance**—the understanding that a more diverse and inclusive work environment can yield greater productivity and help improve individual and organizational performance.^a
- **Measurement**—a set of quantitative and qualitative measures of the impact of various aspects of an overall diversity program.
- **Accountability**—the means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives.
- **Succession planning**—an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization’s potential future leaders.
- **Recruitment**—the process of attracting a supply of qualified, diverse applicants for employment.
- **Employee involvement**—the contribution of employees in driving diversity throughout an organization.
- **Diversity training**—organizational efforts to inform and educate management and staff about diversity.

Source: GAO analysis.

^aThis practice is often referred to as an organization’s business case for diversity.

Each of the 10 agencies selected for our review had its own way of implementing the identified practices, which could reflect each agency’s organizational structure, culture, and priorities. Examples of agencies’ implementation of these leading practices cited in the report may provide insights to other agencies as they undertake or attempt to strengthen or improve their own diversity management initiatives.

We provided a draft of this report to the Equal Employment Opportunity Commission (EEOC) and the U.S. Office of Personnel Management (OPM) for review and comment. In their comments, agency officials generally agreed with the findings of the draft report. We also provided drafts of the relevant sections of this report to cognizant officials from the 10 agencies we reviewed. We made technical clarifications based on these comments where appropriate.

Background

During the 1980s and 1990s, the composition of the U.S. workforce, as documented in demographic statistics, became increasingly diverse. In

1987, a landmark report entitled *Workforce 2000*,⁷ written by researchers with the Hudson Institute for the Department of Labor,⁸ described the increasing diversity of the American workforce by the year 2000. Among the demographic changes the report projected was a rise in the average age of the workforce and an increase in the number of women and minorities entering the workforce. Against this backdrop of expectations for an increasingly diverse workforce, by the 1990s, an industry of consultants had developed, offering books, videos, and training to sensitize workplaces “to the different perspectives and needs of a more diverse workforce.”⁹ Dr. R. Roosevelt Thomas, Jr. is generally credited with originating the term “managing diversity” in 1990.¹⁰

The concept of managing diversity includes everyone and therefore serves as a complement to equal employment opportunity (EEO). EEO focuses on those groups protected by law from employment discrimination. By law, employment actions are to be free from prohibited discrimination on such bases as race, color, religion, gender, national origin, age, or

⁷William B. Johnson and Arnold H. Packer, *Workforce 2000: Work and Workers for the 21st Century* (Indianapolis, Ind.: Hudson Institute, 1987).

⁸The Hudson Institute is a private, not-for-profit research organization with headquarters in Indianapolis, Indiana.

⁹Richard W. Judy and Carol D’Amico, *Workforce 2020: Work and Workers in the 21st Century* (Indianapolis, Ind.: Hudson Institute, 1997); Katherine C. Naff, *To Look Like America: Dismantling Barriers for Women and Minorities in Government* (Boulder, Colo.: Westview Press, 2001).

¹⁰“Managing diversity does not mean controlling or containing diversity, it means enabling every member of your workforce to perform to his or her potential.” R. Roosevelt Thomas, Jr., 1990. “From Affirmative Action to Affirming Diversity,” *Harvard Business Review*, Vol. 68 (1990): pp. 107-117.

disability.¹¹ For purposes of this review, workforce diversity refers to ways in which people in a workforce are similar and different from one another. In addition to the characteristics protected by law, other similarities and differences commonly cited by the literature include but are not limited to background, education, language skills, personality, sexual orientation, and work role.¹² OPM includes workforce diversity as a critical success factor for one of the six elements of human capital leadership—results-oriented performance culture—in its *Human Capital Assessment and Accountability Framework*.¹³ OPM uses the critical success factors in this framework when scoring a federal agency’s implementation of Strategic Human Capital under the President’s Management Agenda.¹⁴ Among other things, OPM examines whether an agency maintains an environment characterized by inclusiveness of individual differences and is responsive to the diverse needs of employees as a critical success factor.

Experts Identified Nine Diversity Management Practices as Leading

Of the experts in the field of diversity management we spoke with or whose publications we reviewed, the majority cited nine practices as leading. These practices are (1) commitment to diversity as demonstrated and communicated by an organization’s top leadership; (2) the inclusion of diversity management in an organization’s strategic plan; (3) diversity linked to performance, making the case that a more diverse and inclusive work environment could help improve productivity and individual and organizational performance; (4) measurement of the impact of various aspects of a diversity program; (5) management accountability for the progress of diversity initiatives; (6) succession planning; (7) recruitment;

¹¹Antidiscrimination laws also protect individuals from retaliation for filing discrimination complaints and other protected activity. Appendix II contains a summary of selected antidiscrimination laws.

¹²In the federal sector, Executive Order (E.O.) 11478, as amended by E.O. 13087, prohibits discrimination in federal employment on the basis of sexual orientation. However, the Executive Order does not afford the same legal protection as antidiscrimination laws.

¹³OPM states on its Web site that the framework offers guidance so that all those involved in transforming human capital management can understand what is to be done, how it can be done, and how to gauge progress and results.

¹⁴The President’s Management Agenda was launched in August 2001 as a strategy for improving the management and performance of the federal government and includes five governmentwide initiatives: strategic management of human capital, competitive sourcing, improved financial performance, expanded electronic government, and budget and performance integration.

(8) employee involvement in an organization's diversity management; and (9) training for management and staff about diversity management. Experts and the literature generally agree that some combination of these identified practices should be considered when an organization is developing and implementing diversity management.

Agencies Provided Examples of Their Implementation of the Cited Practices

We met with officials from the 10 agencies selected for our review,¹⁵ and these officials provided examples of diversity management practices that their respective agencies had implemented and considered to be leading practices. We judgmentally chose from the examples agencies provided to illustrate the implementation of the nine practices that a majority of experts cited as leading. The following sections of this report further describe the nine practices as well as provide examples of how the selected agencies have implemented them.

Top Leadership Commitment

As we testified in 1999, perhaps the single most important element of successful management improvement initiatives is the demonstrated commitment of top leaders to change.¹⁶ Similarly, top management commitment is a fundamental element in the implementation of diversity management initiatives. According to the literature, leaders and managers within organizations are primarily responsible for the success of diversity management because they must provide the visibility and commit the time and necessary resources. A leader committed to diversity management communicates the organization's support for diversity in newsletters, policy statements, speeches, meetings, and Web sites. Communication of this commitment from senior management throughout the organization sends a clear message to others in the organization about the seriousness and business relevance of diversity management.

¹⁵For VHA, we met with officials from the department level—VA—and followed up with a VHA official.

¹⁶GAO, T-GGD-00-26.

Figure 2: Agency Examples of Top Leadership Commitment

The Director of NIH has taken several steps to show his commitment to diversity management. For example, 3 months after his arrival at NIH in 2002, the Director signed the NIH policy on EEO and diversity management, which states that NIH “must offer opportunities for all persons to develop to their full potential in the pursuit and support of science with diversity management integrated into all facets of the NIH.” One NIH official said that the Director leads by example, having made several appointments from diverse groups to leadership positions in the Office of the Director and in the institutes and centers during his tenure thus far. The NIH Director, the official said, frequently discusses the importance of diversity in public meetings and to NIH employees and has created a more unified culture that moves beyond the feeling that at NIH, “there are science people and then the rest of you all.” Another NIH official said that at “town hall” style meetings and other public speaking opportunities,^a the Director discusses diversity management, noting, for example, that the Director had stressed the importance of diversity management at a meeting with Presidential Management Fellows.^b The NIH Director has also written an article on diversity for NIH’s newsletter. In October 2003, NIH’s Director was recognized for his commitment to diversity management, receiving a Chief Executive Officer (CEO) Leadership Award from Diversity Best Practices in recognition of NIH’s efforts to ensure a diverse workforce.^c Of the 10 CEOs to be honored, NIH’s was the only award recipient representing a federal agency.

The U.S. Coast Guard has focused on the management of diversity since March 1993, when its Headquarters Human Resources Coordinating Council chartered a “Managing Diversity as a Process” study. Since 1994, Coast Guard Commandants have included diversity as one of the Coast Guard’s major priorities through the *Commandants’ Directions*, which establish the vision and priorities of the Coast Guard. The first of the then-Commandant’s eight goals in the 1994 *Direction* was to provide leadership and a working environment that enabled all to reach their full potential. The current Commandant reinforces the importance of a capable and diverse workforce in his *Direction* as well as public speeches. For example, in a 2002 speech at the Coast Guard Academy, he stated that the future of the Coast Guard demands a multitude of technical skills and capabilities that require people with broadly diverse talents and backgrounds. In its diversity policy statement, the Coast Guard further states that “diversity in the workforce contributes measurably to creative thinking and innovation so critical to excellence.” A Coast Guard official said that the Coast Guard has been integrating diversity in all processes and has been working hard to “connect the dots.” The U.S. Coast Guard is another federal agency that has been recognized for having implemented diversity management initiatives in an exemplary manner.^d

Sources: NIH and U.S. Coast Guard.

^aThe official said that the town hall style meetings were large affairs that were broadcast on NIH’s Webcast and available to the entire organization.

^bThe Presidential Management Fellows Program is a governmentwide program administered by OPM. The program has two components: Presidential Management Fellows, whose nomination process is conducted by colleges and universities, and Senior Presidential Management Fellows, who may apply directly if they have the requisite qualifications. OPM conducts the selection process for finalists, and individual agencies make the ultimate hiring decisions for the fellows’ 2-year appointment.

^cDiversity Best Practices is a member-based service for companies and government entities to exchange best practices around diversity issues and build management and resources. Diversity Best Practices’ CEO Leadership Awards recognize business leaders across the country who have proven themselves and their organizations as champions for creating inclusive, respectful, and diverse organizational cultures.

^dIn the October 2000 report, *Best Practices in Achieving Workforce Diversity*, the Coast Guard was the only federal agency included among organizations that implemented diversity management practices in an exemplary manner. See U.S. Department of Commerce and the National Partnership for Reinventing Government, *Best Practices in Achieving Workforce Diversity* (Washington, D.C.: 2000), p. 3.

Diversity as Part of the Strategic Plan

Because successful change management initiatives in large public and private sector organizations suggest that it can often take 5 to 7 years to substantially complete such initiatives, it is important to institutionalize them by integrating the initiatives into agencies’ strategic planning efforts.

As we have said, sustaining top leadership commitment to improvement is particularly challenging in the federal government because of the turnover of senior agency political officials.¹⁷ In 2003, we reported that governmentwide, the average tenure of political appointees for 1990 through 2001 was just under 3 years.¹⁸ Integrating diversity management into an organization's strategic plan fosters a culture change that supports and values differences. One recognized expert we talked with also pointed out that an organization must link diversity to its overall strategic plan to ensure that diversity initiatives are not viewed as an "extra," which could make them vulnerable to cuts, for example, when funds are tight.

Figure 3: Agency Examples of Diversity as Part of the Strategic Plan

VA includes diversity management as an "enabling goal" in its 2003 to 2008 strategic plan. The plan explains that the enabling goal differs from a strategic goal as it represents crosscutting activities that enable all organizational units to carry out VA's mission. The enabling goal is to "deliver world-class service to veterans and their families by applying sound business principles that result in effective management of people, communications, technology, and governance." The first objective under this enabling goal is "to recruit, develop, and retain a competent, committed, and diverse workforce that provides a high quality service to veterans and their families." VA states that it has strategies and processes in place to assist the achievement of the enabling goal, specifically that VA "will recruit, support, and retain a knowledgeable, diverse, engaged, and continuously learning workforce."

FDA has a separate diversity management strategic plan that has the vision, mission, goals, objectives, strategies, and measures for addressing FDA's human capital goal. In its August 2003 strategic action plan, FDA states that one goal is to have "more effective regulation through a stronger workforce." The first objective under that goal is to "ensure a high quality, diverse and motivated workforce." According to the executive summary of FDA's multiyear Office of Equal Employment Opportunity and Diversity Management strategic action plan, a prerequisite for achieving FDA's strategic objective is supporting the principles of equity and diversity in the workforce, which the office states that it endeavors to lead.^a The office has three strategic goals for addressing this objective: (1) eradicate discrimination in the workplace by enforcing federal EEO laws, regulations, and policies; (2) promote inclusion and diversity in all levels of the workforce; and (3) empower individuals so that they may participate and contribute to their fullest potential to FDA's mission.

Sources: VA and FDA.

^aThe plan is intended to be a multiyear living blueprint for promoting and integrating diversity management strategies into FDA's operations.

Diversity Linked to Performance

By focusing on diversity management and looking for more ways to be truly inclusive, leading organizations have recognized that diversity can contribute to the achievement of improved individual and organizational performance. According to the literature reviewed, diversity management makes good business sense that enhances productivity and innovation. For

¹⁷GAO, T-GGD-00-26.

¹⁸GAO, *High-Risk Series: Strategic Human Capital Management*, GAO-03-120 (Washington, D.C.: January 2003).

example, promoting diversity might help an organization expand services to meet the needs of a more diverse customer base. The literature also stated that fostering a diverse and inclusive workplace could help organizations reduce costs by reducing turnover, increasing employee retention across demographic groups, and improving morale.

Figure 4: Agency Example of Diversity Linked to Performance

In its Office of Diversity Development's 2003 strategic plan, the U.S. Postal Service states that its policy is to value and manage the diversity of its employees, customers, and suppliers. In the plan, the Postal Service lays out its business case for diversity and states that to leverage diversity and work toward inclusion, it must provide developmental opportunities to all employees equitably, recruit for needed skills, use its talent base to its advantage, and address potential loss of leadership.^a The Postal Service also states that to reach out to diverse, multidimensional, and emerging markets, it must identify and understand the needs of customers and design and implement a comprehensive strategy that demonstrates a value for all customer markets. As an example of extending services to emerging markets, the Postal Service translated customer mailing guides and instructions for many post office documents into Chinese and Spanish.^b The instructions were done as four-color pictures of each document and contained a description of the service provided and how it was used. The Office of Diversity Development identified the post offices with the highest concentration of Spanish and Chinese non-English speaking customers. After a 24-month controlled pilot test at 25 post offices to measure the effectiveness of these tools and evaluate sales at the sites that received them compared with sales at those sites with the national average, the results indicated a growth of over \$14.8 million in net new walk-in retail revenue. According to a Postal Service official, the pilot test results created a business case to widen the program. The official said that the program was deployed in fiscal year 2002, and now new post offices have access to Internet printouts of the translated instructions.

Source: U.S. Postal Service.

^aThis business case includes (1) achieving an inclusive organization as a critical business issue and (2) understanding customers' diversity enables the Postal Service to provide solutions that help customers meet their needs.

^bThese documents included instructions for completing a postal money order; receipts for registered mail, a signature confirmation, a return for merchandise, a domestic return, certified mail, and insured mail; and customs declarations.

Measurement

Quantitative and qualitative performance measures "help organizations translate their diversity aspirations into tangible practice."¹⁹ For example, an organization can track data on its workforce to evaluate the effectiveness of the organization's diversity management efforts and the progress it is making in those efforts. Organizations also can track the return they receive on investments in such areas as diversity training and

¹⁹Catalyst, *Making Change: Using Metrics to Support Workforce Diversity* (New York, NY: 2002), p. 4.

recruitment to evaluate the progress they are making in those efforts.²⁰ In addition to analyzing quantitative workforce data, organizations can use qualitative data derived from interviews, focus groups, and surveys for identifying employee perceptions—including available opportunities and work environment/culture—among various segments of their workforces. For example, organizations can ask employees a series of general organizational questions in such areas as climate, organizational commitment, promotions, job satisfaction, supervision, and performance evaluations.²¹ Over time, trends in responses are the types of qualitative information that can help organizations assess how their diversity initiatives are progressing in achieving organizational goals and objectives. Finally, in a 2001 report on human capital and workforce diversity,²² the National Academy of Public Administration stated that good performance measurements shared some common traits regardless of the environment in which they were used, including being based on reliable and accurate data that are consistent and compatible with existing business systems and processes. VA, for example, provides data on its workforce, including data on those in the leadership pipeline (i.e., employees in grades 13, 14, and 15), to all managers through their personal computers.

²⁰For diversity training, organizations can calculate the percentage of employees retained as a result of the training by first considering components that increase retention (e.g., employee development and satisfaction), then estimating the effect of the diversity training on those elements. For recruitment, organizations can calculate the cost of recruiting channels (e.g., agencies, Internet, newspapers) and cross-reference those costs with the volume and quality of candidates yielded in order to reallocate funds to the most effective recruiting channels.

²¹Jack E. Edwards, John C. Scott, and Nambury S. Raju, *The Human Resources Program-Evaluation Handbook* (Thousand Oaks, Calif.: Sage Publications, 2003), p. 354.

²²National Academy of Public Administration, *Human Capital and Workforce Diversity: The Business Case Analysis* (Washington, D.C.: 2001), pp. 7-8.

Figure 5: Agency Examples of Measurement

NOAA relies on one of its organizational assessment tools—the Survey Feedback Action (SFA) process—to survey all NOAA employees via an online questionnaire,^a hold facilitated feedback sessions at the workgroup level (i.e., an employee’s immediate group of people—the lowest level of contact) to provide survey results, and plan actions to address issues raised in the feedback sessions. In 1998, NOAA conducted its first NOAA-wide baseline survey and continued with a successive survey in 2002. The SFA process is designed to measure the perception of employees on NOAA’s organizational culture in a standard survey, covering a range of dimensions on the quality of an employee’s work life.^b In addition to the survey component, the SFA process provides survey results to employees and their workgroup members during facilitated feedback and action planning meetings.^c Survey feedback was provided at all organizational levels. According to a NOAA official, to measure its progress in its diversity strategy, NOAA uses such measures as use of sick leave, complaints, grievances, accessions, and attrition. According to information on NOAA’s Web site, feedback action meetings, which are facilitated by trained NOAA in-house facilitators, are to provide a forum for workgroup members to interpret the survey results, determine how to work better together, identify successes and areas that need improvement, and develop a process for action planning. According to a NOAA official, the “heart” of the diversity component of SFA is in the facilitated meetings, which serve as an experiential learning laboratory of NOAA’s diversity premises: inclusion; supportive systems, policies, and practices; and supportive behaviors at the personal, interpersonal, and group levels.^d The Director of the Office of Diversity said that if a workgroup cannot resolve an issue in a feedback meeting, the issue is elevated to the next management level to see if it can be resolved there. In addition, the Director said that a contractor implemented “Action Tracker,” a system that gives managers the flexibility to input actions taken to resolve issues, and that approximately 6,133 actions have been taken as a result of workgroups, reflecting intervention “from the bottom up and the top down.”

NIST uses a survey conducted under its Diversity Assessment Program to assess culture and morale. According to a NIST official, the Diversity Advisory Board (DAB) recognized that NIST had only anecdotal evidence of how staff felt and needed a more systematic approach in assessing culture. Another official said that questions for the first survey in 1998 contained a variety of categories, including career progression, overall satisfaction, and open-ended questions. Although the initial survey focused only on the culture of the agency, the then Deputy Director wanted to add questions that would gauge morale as well, to determine how people actually felt about working at NIST. As a result, components on culture and morale were combined in the next two surveys, which included some diversity management questions.^e Each operating unit received feedback at the division level in a briefing from the contractor who administered the survey, and operating unit managers were asked to put action plans in place to address concerns raised by survey results.^f According to a NIST official, survey results were used to help develop diversity goals and objectives for the diversity strategic plan.

Sources: NOAA and NIST.

^aThe survey is also made available via the telephone or hardcopy for those who do not have access to the Internet.

^bThe survey includes questions about NOAA’s reward and recognition processes, team work, communication, training and career development, fairness and treatment of employees, supervision, customer focus, work environment, employee involvement, innovation, EEO, overall satisfaction, additional experiences, leadership, communication, and organizational measures.

^cAccording to a NOAA official, these meetings are integral to SFA because employees are provided an opportunity and equal voice to interpret survey results, identify successes and areas that need improvement, and resolve issues of concern in their work environment through the development of focused action plans.

^dNOAA’s in-house facilitators are educated in managing diversity, understanding differences, and experiential learning and serve as neutral third parties assisting workgroups, identifying issues, ensuring inclusion of all voices, and achieving agreement during the feedback and action planning meetings.

^eA NIST official said that the survey had two specific indexes: diversity and employee satisfaction, which were in the NIST balanced scorecard.

^fA NIST organizational chart shows 12 operating units, and an organizational listing shows those operating units to be composed of divisions.

Accountability

We have previously pointed to the importance of holding managers accountable for contributing to the achievement of an organization's strategic goals through performance management and rewards systems.²³ According to diversity management literature,²⁴ accountability is also a key element for organizations to ensure the success of a diversity management effort by providing a means for ensuring that managers at all levels are made responsible for diversity in their organizations and evaluated on their progress toward achieving their diversity goals and their ability to manage a diverse group of employees. An organization may make managers' performance ratings and compensation dependent, in part, on their success in achieving diversity-related goals. For federal senior executives, such accountability is consistent with section 4313 of title 5, which provides performance appraisal criteria for those in the Senior Executive Service (SES), including the achievement of EEO requirements. This accountability also is consistent with EEOC's recent instructions to federal agencies for implementing EEO Management Directive 715.²⁵ The instructions describe the requirement that agencies inform managers and supervisors that success and a positive evaluation will include an assessment of how that manager contributes to the agency's EEO program by emphasizing to managers and supervisors that equality of opportunity is essential to attracting, developing, and retaining the most qualified workforce, with such a workforce being essential to ensuring the agency's achievement of its strategic mission.

Recognizing that an agency's people are vital assets and people achieve organizational goals and results, OPM's regulations on SES performance management call for appraisal of executives using measures that balance organizational results with employee perspectives.²⁶ In 2002, we reported that senior executives can foster fairness and diversity by protecting the rights of all employees, providing a fair dispute resolution system, and

²³GAO, *Human Capital: A Self-Assessment Checklist for Agency Leaders*, GAO/OGC-00-14G (Washington, D.C.: September 2000); GAO-02-373SP.

²⁴*Best Practices in Achieving Workforce Diversity*, p. 12.

²⁵EEOC's instructions provide guidance and standards to federal agencies for establishing and maintaining effective affirmative programs of EEO, provide agencies additional operational instructions on how to accomplish the requirements of the management directive, and emphasize what federal agencies should do to ensure that personnel actions are made free of any discrimination.

²⁶5 C.F.R. Part 430, Subpart C.

working to prevent discrimination through equality of employment and opportunity.²⁷ We found examples of senior executive performance expectations included (1) taking steps to implement EEO requirements; (2) requiring all subordinate managers and supervisors to receive diversity awareness and EEO training; and (3) establishing a zero tolerance standard for discrimination, harassment, and hostile work environments.

²⁷GAO, *Results-Oriented Cultures: Using Balanced Expectations to Manage Senior Executive Performance*, [GAO-02-966](#) (Washington, D.C.: Sept. 27, 2002).

Figure 6: Agency Example of Accountability

According to an NIH official, NIH managers take diversity seriously, holding people accountable for managing diversity in their organizations.^a According to NIH's SES Performance Guidance for 2003, each SES executive was to submit narrative descriptions of accomplishments for the year, including a narrative for a critical element that promotes EEO and workforce diversity programs. To address their contribution toward this element, executives were to write narratives describing actions the executives had taken including to

- comply with relevant EEO laws, regulations, and NIH policies;
- ensure the equitable development and recognition of staff at all levels;
- implement and manage a diverse workforce;
- support EEO and diversity management programs by allocating adequate staff and fiscal resources; and
- describe the procedures implemented for monitoring a subordinate manager's EEO and diversity management programs.

NIH SES annual performance ratings and bonus nominations are reviewed by the NIH Performance Review Board and approved by the NIH Director. The Performance Review Board membership includes the NIH Deputy Directors and representatives of the Institute Directors and Institute Scientific Directors. The Director of the Office of Equal Opportunity and Diversity Management (OEODM) serves as an advisor to the board. If there are serious proven EEO violations, under the requirements of the critical element that promotes EEO and workforce diversity programs, the Director of OEODM can advise the Performance Review Board on the appropriateness of a bonus. One NIH official explained that if an SES official had a proven record of noncompliance with this critical element, the OEODM Director could advise the board against that official getting a bonus; this happened in one instance, and the bonus did not go through.

Source: NIH.

^aNIH also holds managers accountable for their EEO responsibilities.

Succession Planning

Succession planning is a comprehensive, ongoing strategic process that provides for forecasting an organization's senior leadership needs; identifying and developing candidates who have the potential to be future leaders; and selecting individuals from among a diverse pool of qualified candidates to meet executive resource needs. Succession planning and management can help an organization become what it needs to be, rather than simply recreate the existing organization. Leading organizations go beyond a "replacement" approach that focuses on identifying particular individuals as possible successors for specific top-ranking positions and engage in broad, integrated succession planning and management efforts that focus on strengthening both current and future capacity. They anticipate the need for leaders and other key employees with the necessary competencies to successfully meet the complex challenges of the 21st century.

Succession planning also is tied to the federal government's opportunity to change the diversity of the executive corps through new appointments. As

we testified in October 2003,²⁸ the federal government faces large losses in its SES, primarily through retirement but also because of other normal attrition. The SES generally represents the most experienced and senior segment of the federal workforce. The expected loss of more than half of current career SES members through fiscal year 2007, as well as significant attrition in the GS-15 and GS-14 workforce—the key source for SES appointments—has important implications for federal agencies and underscores the need for effective succession planning. This presents the government with substantial challenges for ensuring an able management cadre and also presents opportunities to affect the composition of the SES. In September 2003,²⁹ we reported that agencies in other countries use succession planning and management to achieve a more diverse workforce, maintain their leadership capacity, and increase the retention of high-potential staff. Our work has shown that federal agencies will need to enhance their efforts to improve workforce diversity as the SES turns over.

²⁸GAO-04-123T.

²⁹GAO, *Human Capital: Insights for U.S. Agencies from Other Countries' Succession Planning and Management Initiatives*, GAO-03-914 (Washington, D.C.: Sept. 15, 2003).

Figure 7: Agency Examples of Succession Planning

The U.S. Postal Service has a formal succession planning process in which its Office of Diversity Development plays a key role. According to a Postal Service official, this succession planning program is unique because it includes self-nomination, self-assessment, and a leadership assessment survey administered by Gallup. According to the guidelines on Corporate Succession Planning, the Postal Service's goal is to have a pool of qualified Executive Administrative Service (EAS) and Postal Career Executive Service (PCES) employees ready to fill current and executive and officer positions. Each year, after the Office of Diversity Development announces the dates of the succession planning cycle, all EAS employees at level 22 and above,^a as well as current executives, can nominate themselves for executive positions by completing an online succession planning application on the Postal Service Diversity Development Intranet site.^b The nominee's executive manager then informs the succession planning committee of whether he or she supports the nominee. The area and headquarters succession planning committees review application packages, discuss nominees, and make selections on the basis of the extent to which nominees meet experience requirements, leadership potential, and eight corporate competencies.^c The Postal Service considers the development of potential successor employees for executive leadership roles as a stage in the succession planning process. In fiscal year 2002, the Postal Service completed a Web-based individual development plan system, which is found on the Diversity Development Intranet site. Individuals who already are in management positions must use the Web-based individual development plan system to identify their skills, training, areas of expertise, and areas of development focus. The Postal Service states that it tracks this information to ensure that all potential candidates for higher level or more specialized jobs are following a plan that includes the training and work experiences necessary to enable these individuals to fill vacant positions and lead the organization into the future.

In January 2003, VA provided guidance to all of its components on succession planning in the form of a directive on workforce and succession planning.^d The directive requires that all VA administrations, staff offices, and boards with 100 employees or more produce workforce and succession plans aligned with overall VA strategic planning, budget, and legislative processes. In addition, the directive states that the workforce and succession planning process is intended to align VA's workforce with the critical needs of VA's mission. As part of this alignment, the directive requires various assessments, including the current and projected workforce in terms of workforce diversity. In VA's *2003 Strategic Human Capital Management Plan*, VA's three administrations—the Veterans Health Administration (VHA), Veterans Benefits Administration, and the National Cemetery Administration—as well as VA's Central Office summarize their workforce and succession plans.^e In analyzing their workforces, VHA and several organizations in VA's Central Office forecast their needs for potential future leaders. VHA states that although its overall workforce is fairly diverse, women and minorities are not well represented in leadership positions and the pipeline to leadership positions. In addition, in the workforce and succession plan summary of VA's Central Office, the Office of the Assistant Secretary for Management proposes developing a process for identifying high-performing nonsupervisory employees and providing those employees with a formal mentoring program, experiential leadership opportunities, and exposure to all facets of the organization's operations. Similarly the Board of Veterans' Appeals states that it is developing a plan to cultivate professional staff to step into more responsible roles and provide the backbone of the board's leadership cadre. In addition, VA addresses candidate developmental opportunities for individuals who demonstrate outstanding executive potential through another directive.^f This directive states that VA would provide appropriate developmental opportunities for VA executives and individuals competitively selected as candidates for executive positions within VA. Such opportunities are to reflect VA's commitment to promote EEO and to build a diverse executive corps that reflects the diversity of the labor force.

Sources: U.S. Postal Service and VA.

^aEAS employees at level 22 compare roughly to other federal employees who are paid under the fiscal year 2004 general schedule at grade 11, step 6 to grade 14, step 3.

^bA nominating executive or officer also can identify nominees and request that they complete and submit applications.

^cThe eight corporate competencies are strategic thinking, problem solving, communication policy/program information, listening, leadership and team building, interpersonal sensitivity, initiative, and change agent.

^dVA Directive 5002 issued on January 15, 2003.

^eVA's Central Office workforce and succession plan includes the following organizations with 100 or more employees: Assistant Secretary for Management, Assistant Secretary for Human Resources and Administration, Assistant Secretary for Information and Technology, Office of General Counsel, and the Board of Veterans' Appeals.

Recruitment

Recruitment, a key process by which federal agencies attract a supply of qualified, diverse applicants for employment, is the first step toward establishing a diverse workforce. To ensure that organizations are reaching out to diverse pools of talent, they can widen the selection of schools from which they recruit to include, for example, historically Black colleges and universities, Hispanic-serving institutions, women's colleges, and schools with international programs. In addition, the literature discusses the importance of organizations building formal relationships with such schools to ensure the cultivation of talent for future talent pools. The literature states that organizations also may want to consider partnering with multicultural professional organizations and speaking at their conferences to communicate their commitment to diversity to external audiences and strengthen and maintain relationships. Although the focus of recruitment efforts in the diversity management literature is with colleges and universities, given the number of federal employees, including those in the SES, who are eligible for retirement in the next few years, there will be a need for the federal government to also recruit midcareer employees, which we are defining as employees who are generally 40 and over and have 10 or more years of work experience.

Figure 8: Agency Examples of Recruitment

FAA recently revised some of its recruitment strategies. In June 2002, FAA issued a *5-year Corporate Recruitment Plan* that contains the findings and recommendations of a cross-organizational recruitment task force.^a One of the plan's recommendations, which FAA implemented, was to develop a recruitment tool kit for use by managers, supervisors, and those with recruitment responsibilities. The recruitment tool kit includes various recruitment sources for minorities and diverse populations by state, including lists of Hispanic-serving institutions, historically Black colleges and universities, colleges and universities with a significant population of Asian Americans and Pacific Islanders, and professional minority organizations. FAA also has internship opportunities, which are designed to recruit a diverse group of future candidates for FAA. Its Minority-Serving Institutions Internship Program is designed to provide professional knowledge and experience at FAA or firms in the private sector for minority students and students with disabilities who are enrolled in a college or university, major in relevant fields and related disciplines, and have a minimum of a 3.0 grade point average. The program allows students to earn academic credit for their participation in an internship during the fall or spring semesters or over the summer.^b In addition, FAA launched an interactive Web site to facilitate recruitment and outreach efforts for managers and supervisors.^c By accessing the Web site, managers and supervisors may view, manage, and post jobs as well as access the resume database and search resumes, view a specific resume, and identify resume search agents based on selected areas of expertise or key words and phrases.

A NIST official said that when NIST hosts recruitment or other programs, it makes use of relationships the agency has with colleges, universities, and other groups to inform students about internship or employment opportunities. One group that helps arrange such recruitment efforts is the National Organization of Black Chemists and Black Chemical Engineers (NOBCCHE).^d The NIST official said that NIST had been active in NOBCCHE's leadership for years and that two NIST employees are on its executive board. Another NIST official said that NOBCCHE has helped with NIST summer intern recruitment efforts. For example, if NIST had a few summer internships for the chemical science area, NIST officials would contact NOBCCHE scientists who would inform college and university students who were members of NOBCCHE. The official also said that the Science and Engineering Alliance (SEA) is another organization in which NIST also has been active in the leadership. According to information on its Web site, SEA is a consortium that serves four state-supported historically Black colleges and universities^e and the Department of Energy's Lawrence Livermore National Laboratory to help ensure an adequate supply of top-quality minority scientists, while meeting the research and development needs of the public and private sectors. The NIST official explained that SEA and NIST are involved in the scientist exchange program, which serves as a vehicle for an exchange of students, faculty, and staff members between the SEA institutions and NIST. He said that this exchange helps supply the NIST pipeline with students and interns.

Sources: FAA and NIST.

^aThe plan recommended that FAA establish a corporate council for recruitment and retention; produce recruitment and retention plans; develop a recruitment tool kit for use by managers, supervisors, and those with recruitment responsibilities; establish a recruitment Intranet site; develop a formal mechanism for the lines of business to share recruitment and retention information and initiatives; and establish a corporate-level system to track, monitor, and measure ongoing progress.

^bThe program provides interns with a weekly stipend and the cost of travel to and from their internship locations.

^cFAA contracted with a Web-based recruitment source that provides FAA with multicultural recruitment advertising and exposure in promoting FAA employment opportunities nationwide.

^dAccording to information on the NOBCCHE Web site, the organization has held national meetings since 1974 and provides an opportunity for black chemists and chemical engineers to discuss issues of significance to their careers, present technical papers, and formulate priorities and topics for future meetings.

^eThe four schools are Alabama A&M University, Jackson State University, Prairie View A&M University, and Southern University and A&M College.

Employee Involvement

According to the literature, involving employees in diversity management helps them contribute to driving diversity throughout an organization. Employees may become involved in their organizations' diversity

management efforts by forming employee diversity task forces, councils, boards, and networks (also called advisory, advocacy, support, affinity, or resource groups) to identify issues, recommend actions, and help develop initiatives. Organizations also can establish advisory groups that include representatives from many specific groups. In addition, mentoring programs are a popular method for organizations to develop and retain newer employees and require the involvement of more senior or experienced employees. The diversity management literature also describes employees reaching out in their communities.

Forming Advisory Groups to Facilitate Change

Most of the 10 agencies had some type of diversity advisory board.

Figure 9: Agency Examples of Advisory Boards

NIST's Diversity Advisory Board (DAB) was established in 1993 but received its current name in 1998 under a rechartering. The DAB provides a visible forum for independent advice and assistance to NIST and the management of NIST's 12 operating units on diversity-related plans, policies, and programs.^a In addition to the DAB,^b NIST has an advisory council—the People Council—that is chaired by a senior manager and that focuses on people.^c A NIST official explained that the DAB and People Council both contributed to the diversity strategic plan, with the DAB starting the draft plan in 2001 and turning it over to the People Council for completion. In 2003, senior NIST management adopted the diversity strategic plan, which has four objectives: increased awareness of diversity values and sensitivities by NIST senior management, managers, and staff; retention of existing diversity and work-life enhancement; active promotion of outreach and creation of a visible network of connections or routes to NIST; and recruitment and workforce planning for enhanced diversity.^d

More recently, according to an FDA official, FDA founded its Diversity Council in August 2004. The Diversity Council's charter states that the council was designed to serve as an advisory body to the Commissioner of FDA, the FDA Management Council, and the Director of the Office of Equal Employment Opportunity and Diversity Management. Among its purposes, the Diversity Council is to foster effective diversity management practices in FDA, promote workforce diversity initiatives, and integrate the principles of diversity management in FDA. According to its charter, the Diversity Council, which meets monthly, has 18 voting members, 2—an appointed management employee and an appointed nonmanagement employee—from each FDA Center and the Office of the Commissioner, from the headquarters Office of Regulatory Affairs, and from the field offices of the Office of Regulatory Affairs; and 5 nonvoting members, including 1 union representative, FDA's Human Resources Liaison, and 3 representatives from FDA's Office of Equal Employment Opportunity and Diversity Management.

VHA established the Under Secretary of Health's Diversity Advisory Committee in 1993. In 1995, the committee was renamed the Under Secretary of Health's Diversity Advisory Board. According to a VHA official, VHA recently selected new leadership to take the board "to the next level."

Sources: NIST, VHA, and FDA.

^aAccording to NIST officials, the DAB consists of a representative from the Diversity Program Office, each operating unit, employee organizations, administrative staff, group leaders, and ex-officio members.

^bNIST states that the DAB has two main roles: (1) to advise the NIST Director on diversity issues, plans, and policies and (2) to advise the operating unit management on strategic planning for diversity, addressing recruitment outreach, retention, staff development, and organizational culture.

^cAccording to a NIST official, the People Council was formed in January 2002 and consists of two operating unit directors, one deputy director, one division chief, one group leader, and one or two members at the bench level.

^dAccording to a NIST official, the agency's 5-year diversity strategic plan is worked into the overall agency strategic plan through the People Council.

Providing Mentoring Opportunities for Developing and Retaining Staff

According to one expert, mentoring programs became popular in the mid-1980s as part of organizations' efforts to improve the promotion and retention of women and minorities. However, as mentoring success stories continued, organizations increasingly realized that mentoring relationships could benefit all employees, not just those from the protected groups. Mentoring can help new employees adjust to an organization's culture. It also can help identify and develop high-potential employees, improve employee productivity and performance, and promote retention and diversity.

Figure 10: Agency Examples of Mentoring

NIH encourages mentoring through various programs, such as the NIH Management Intern Program,^a the Presidential Management Fellows Program,^b the Emerging Leaders Program,^c and the Management Cadre Program.^d An NIH official explained that having the right mentor for new or young employees in the science areas is critical, especially for retaining minorities, and that the mentoring program is consciously trying to foster relationships. The official added that NIH also tries to get employees to have more than one mentor, because a scientist, for example, might not be very helpful at helping a young person develop networking skills. In addition, the NIH Administrative Training Committee has a Mentoring Subcommittee that promotes the availability of high-quality mentoring resources to support the NIH Management Intern Program, the Presidential Management Fellows Program, and the Emerging Leaders Program. For example, each fellow in the Presidential Management Fellows Program is assigned a mentor for the duration of the fellowship to provide advice on rotational assignments, training opportunities, and future career options. In addition, for the Emerging Leaders Program, mentors are assigned to provide career development advice and support, and training in Department of Health and Human Services core competencies and values. According to information on the NIH Web site, for the NIH Management Cadre Program, a mentor is assigned at the beginning of the program and, among other things, assists with preparing the individual development plan for the mentee. NIH states that the program represents an important component of NIH's efforts to develop a diverse group of well-qualified candidates for management positions.

According to information on its Web site, the Coast Guard has had a mentoring program since 1990, and a Coast Guard official said that people must go through training to become mentors. The Coast Guard has a guide titled, *Establishing a Local Mentoring Program*, which is intended to be a resource for commands to establish and manage a mentoring program, providing a tool for managing local programs and a curriculum for training program coordinators and participants. The Coast Guard Web site provides additional information and guidance on mentoring, such as how to be an effective mentor and mentee and frequently asked questions about mentoring, such as the difference between formal and "natural" mentoring. The Web site explains that natural mentoring occurs when people select people who are similar to them and form a mentoring relationship. Sometimes natural mentoring may not occur, so the Coast Guard established the formal mentoring program. A Coast Guard official said that there is a computer process for matching mentors and mentees and that the Coast Guard wants people to mentor individuals who are different from them.

Sources: NIH and U.S. Coast Guard.

^aThe NIH Management Internship Program is a 2-year program that offers highly motivated NIH employees (GS-5 or above) an opportunity to explore different administrative fields and change careers.

^bThe Presidential Management Fellows Program is a governmentwide program administered by OPM. The program has two components: Presidential Management Fellows, whose nomination process is conducted by colleges and universities, and Senior Presidential Management Fellows, who may apply directly if they have the requisite qualifications. OPM conducts the selection process for finalists, and individual agencies make the ultimate hiring decisions for the fellows' 2-year appointment.

Encouraging Employees to Reach Out to the Community

^cThe Emerging Leaders Program is a 2-year program within the Department of Health and Human Services, that allows participants to explore scientific, public health, social science, information technology, and administrative career paths.

^dThe Management Cadre Program is designed to develop a diverse group of well-qualified candidates for future leadership positions by training successful and highly motivated NIH employees currently in GS/GM grades 12 to 14.

Several sources described organizations' encouraging employees to volunteer in their communities to help make the communities aware of what the organization does.³⁰ In addition, in its recent instructions to federal agencies for implementing EEO Management Directive 715, EEOC suggests that agencies allocate mission personnel to participate in, among other things, community outreach programs with private employers, public schools, and universities.

³⁰Most examples of such outreach efforts concerned companies encouraging employee community involvement and volunteerism to raise awareness of the companies' presence and keep the companies informed of demographics and market changes.

Figure 11: Agency Examples of Community Outreach

According to NIST's Diversity Tool Kit for Managers,^a the community outreach programs at NIST support diversity initiatives by educating the community about the agency and the functions it performs. According to a NIST official, staff actively reach out to local schools, including through mentoring and tutoring programs that help students with their class work, raise their awareness of scientific careers, and increase community involvement. Other outreach programs identified in the tool kit include (1) the National Hispanic Youth Initiative, which prepares, motivates, and encourages high school Hispanic youth to pursue a career in the areas of scientific and biomedical research; (2) the Student Volunteer Program, which provides high school and college students a learning experience and exposure to career opportunities by volunteering at NIST in such areas as physical science, mathematics, engineering, computer science, and administration; (3) the Student Career Experience Program, which provides high school, undergraduate, and graduate students work experience at NIST that is directly related to their educational and career goals; (4) the Resource Education Awareness Partnership, which includes researchers and other professionals at NIST who volunteer their time by giving science presentations to public school students; and (5) the Metropolitan Consortium for Mathematics, Science, and Engineering,^b which strives to increase the awareness of students from underrepresented groups in career opportunities and challenges in the fields of mathematics, science, and engineering.

FAA has a number of outreach programs that support diversity initiatives through educating the community. According to information on the FAA Web site, the programs include the aviation education counselors, the "Air Bear" program, the Aviation Career Education camps, and the Space Day program. The aviation education counselors are trained volunteers who have an interest in sharing their knowledge with the community and give speeches and presentations as requested, depending on the availability of counselors in the region where a request is made. FAA states that the Air Bear program is a national program designed for children in kindergarten through third grade that can stimulate an early interest in math and science, introduce exciting career choices for boys and girls, eliminate fears children often have about flying, and promote aviation safety.^c The Aviation Career Education camp program is a 1-week summer aviation education program that exposes middle and high school students to a range of aviation career experiences, with an emphasis on opportunities for women and minorities.^d FAA also is a partner of the Space Day program, which is an educational initiative that takes place on the first Thursday of May worldwide and is designed to promote math, science, technology, and engineering education.^e

Sources: NIST and FAA.

^aThe Diversity Tool Kit for Managers provides managers with supporting guidance and information toward managing and measuring different aspects of a diversity management program, including mentoring, community outreach, and recruitment and retention.

^bThe Metropolitan Consortium for Mathematics, Science, and Engineering is a nonprofit organization dedicated to providing a link between the Washington, D.C. public schools and technology-orientated resources in the region.

^cThe Air Bear program involves the Air Bear mascot visiting schools for a demonstration and is sponsored by FAA, the National Association of State Aviation Officials, and the Ninety-Nines—an international organization of women pilots.

^dThe program is cosponsored by FAA and other organizations and reaches approximately 1,500 to 2,000 students per year.

^eThe Space Day program is international, has more than 75 sponsors, and has participants numbering in the hundreds of thousands of teachers and millions of students in 21 countries.

Diversity Training

According to the literature, diversity training can help an organization's management and staff increase their awareness and understanding of diversity as well as help them develop concrete skills to assist them in communicating and increasing productivity. Such training can provide employees with an awareness of their differences—including cultural, work style, and personal presentation—and an understanding of how diverse perspectives can improve organizational performance. It also

should teach employees about the importance of the organization's diversity goals and the skills required to work effectively in a diverse workforce.³¹ In addition, to increase employee effectiveness in a diverse environment, one source stated that training should include teambuilding, communication styles, decision making, and conflict resolution.³² This is consistent with EEOC's recent instructions to federal agencies for implementing EEO Management Directive 715, which requires that agencies develop supervisors and managers who have effective managerial, communication, and interpersonal skills to supervise most effectively in a workplace with diverse employees. Finally, as we recently reported on training in the federal government,³³ agencies should attempt to assess the effectiveness of their training efforts. Such an assessment can help decision makers in managing scarce resources and help agencies improve results.

³¹Katherine C. Naff, *To Look Like America: Dismantling Barriers for Women and Minorities in Government*, p. 197.

³²Sherrie St. Amant and Marilyn Mays, "Ten Tips for Diversity Best Practices" (Wellesley, Mass.: Northeast Human Resources Association, 2002).

³³GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

Figure 12: Agency Examples of Diversity Training

NIH has interactive training modules on EEO and diversity management available online to individuals inside and outside of NIH. Upon completion of the three modules, participants receive certificates of completion in the prevention of sexual harassment, disability awareness, and diversity management. The first module provides information and situational examples to help NIH managers, supervisors, and employees recognize sexual harassment and eliminate it from the workplace. The second module is meant to provide an awareness of issues concerning persons with disabilities, including legislation related to disability, reasonable accommodation, and attitudinal barriers. The third module focuses on approaches to diversity management, NIH's diversity management efforts, and how participants can avoid cultural collisions.

According to a BOP official, BOP holds two sets of diversity training for trainers per year. These trained diversity specialists ensure that all BOP staff receive refresher diversity training annually at their respective facilities. Wardens choose the diversity specialists at each facility based on their maturity and whether they have worked for BOP for at least 1 year. The specialists are trained in-house and hold collateral duty positions. The official said that the diversity training emphasizes that not all differences are related to race and gender and that often problems seen as racial in nature are actually based on personality differences. BOP follows up its training sessions with surveys to find out how well the training worked, and participants are to evaluate the training and how it will affect them when they return to their facilities.

NOAA's Director of the Office of Diversity said that NOAA does not rely heavily on traditional diversity training classes. Instead, she said that NOAA relies on David A. Kolb's model of experiential training, which she explained is how adults learn better.^a For example, NOAA's Office of Diversity partnered with the Howard University School of Continuing Education to develop *Developing a Multi-Lingual Ear*, a course that helps NOAA employees develop and use listening skills and techniques essential for communicating more effectively with colleagues and customers whose native language is not English.^b One Office of Diversity staff member said that the office at one time had many different course offerings. To be more cost-effective, the staff member said that the Office of Diversity decided to have a large training event, which is how it started the diversity education conferences. Now at the conference—NOAA's Diversity Summit—several hundred NOAA employees from all occupations, regions, line offices, and staff offices have the opportunity to learn and network and take a variety of week-long courses, including a diversity change agent course,^c which is required for all NOAA diversity consultants; group process consultation; and the Myers-Briggs Type Indicator Qualifying Workshop.^d NOAA also provides various tools for employees to identify skills, thinking styles, personality types, and where they are on various diversity dimensions.^e

Sources: NIH, BOP, NOAA.

^aThe Diversity Director stated that Kolb's model asserts that learning should really be approached as a continuous spiral and that the learning cycle can begin at any one of four points: (1) a person carrying out a particular action and then seeing the effect of the action in this situation, (2) understanding these effects in the particular instance so that if the same action was taken in the same circumstance it would be possible to anticipate what would follow from the action, (3) understanding the general principle under which a particular instance falls, and (4) applying experiential learning through a new circumstance within the range of generalization.

^bAccording to information on NOAA's Web site, the Office of Diversity contacts course participants before the class to identify the types of accents or languages they encounter in the workplace. Course participants can listen to audiotapes of different dialects by country of origin, so that they can train their ears to better understand English spoken by a foreign tongue. The Director said that part of the course is for participants to attune themselves to hear that some languages are tonal and that certain words have special emphasis.

^cIn 1998, NOAA's change agent course received the Trainer's Conference Distinguished Service Award for content and design, which includes systems diagnosis, conflict resolution, cross-cultural communications, and understanding and managing change. The objective of the course is to provide participants with the skills, knowledge, tools, and techniques to effectively become agents for change in diversity management.

^dParticipants who successfully complete the Myers-Briggs Type Indicator Qualifying Workshop are qualified to administer the Myers-Briggs Type Indicator—a measurable psychological instrument that is used to help people understand how their personality differs from that of others and deal with the differences in a constructive way.

^eThese tools include the Thomas Kilman Conflict Model, FIRO-B, and the Disc—dimensions of behavior—among others that act as communication vehicles for workgroups.

Agency Comments

On November 10, 2004, we provided a draft of this report to EEOC and OPM for review and comment. In written comments, the Director of EEOC's Office of Federal Operations generally agreed with the findings of the draft report and stated that expanding agency knowledge of the available tools to achieve diversity is critical to the government's success in maintaining a workplace that is inclusive and responsive to the needs of an increasingly diverse workforce (see app. IV). The Director stated that federal agencies can learn from the experiences and successes of others and that this report would assist in that effort. He added that future studies of diversity management practices are warranted and could explore the effectiveness of these practices, particularly measurement. We agree. We have an engagement under way that reviews measurement practices for EEO and diversity management in selected federal agencies. We also have begun work that is to provide examples from the private sector of the leading diversity management practices identified in this report. In written comments, the Director of OPM generally agreed with the findings of the draft report, noting that the agencies identified merit recognition for their efforts in diversity management (see app. V). The Director of OPM also noted that the area of diversity is an important element in the President's Management Agenda. In addition, the Director of OPM provided technical comments, which we incorporated.

We also provided drafts of the relevant sections of this report to cognizant officials from the 10 agencies we reviewed. We made technical clarifications based on these comments where appropriate.

As arranged with your office, unless you publicly announce its contents earlier we plan no further distribution of this report until 7 days from the date of this letter. At that time, we will send copies of this report to other interested congressional parties, the Director of OPM, and the Chair of EEOC. We also will make copies available to others upon request. In addition, the report is available on GAO's home page at <http://www.gao.gov>.

If you or your staff have questions about this report, please contact me on (202) 512-9490 or Belva Martin, Assistant Director, on (202) 512-4285. Key contributors to this report are listed in appendix VI.

Sincerely yours,

A handwritten signature in black ink that reads "George H. Stalcup". The signature is written in a cursive style with a large initial "G" and a distinct "H" and "S".

George H. Stalcup
Director, Strategic Issues

Objectives, Scope, and Methodology

Our objectives were to identify (1) leading diversity management practices and (2) examples of those practices in federal agencies.

Objective 1: Identifying Leading Practices

To identify leading diversity management practices, we first reviewed literature on diversity management. This review included academic literature on diversity management, books and articles written by consultants and practitioners, and reports produced by government agencies and research organizations.

We then met with various federal officials and experts in diversity management. This included officials from the central leadership agencies—the Equal Employment Opportunity Commission (EEOC), Merit Systems Protection Board, U.S. Office of Personnel Management (OPM), and the U.S. Office of Special Counsel. At the National Academy of Public Administration (NAPA), we met with one former official—a former Director of the Center for Human Resource Management—and two current officials—the Director and Deputy Director of the Center for Human Resources Management. These officials were helpful in suggesting experts to contact in the field of diversity management.

On the basis of our literature review and our discussions with federal and NAPA officials, we established criteria for and identified a list of recognized experts. These criteria included

- the expert's recognition in the professional or academic community,
- depth of experience in diversity management, and
- relevance of his or her published work or research to diversity management.

We defined recognition as an acknowledgment of expertise from officials of such organizations as NAPA, the Society for Human Resource Management, and the Private Sector Council. We defined experience as having practical or academic experience in diversity management for at least 7 years. After the experts were selected, we gathered their views on leading practices using questions from a data collection instrument. We reviewed their responses and counted the number of times an expert or a publication by an expert cited a diversity management practice. We identified as leading those practices that a majority of experts cited in

interviews or publications as leading practices, best practices, or components of a successful diversity initiative.

Our characterization of diversity management practices is methodologically dependent on the experts contacted and sources reviewed. We recognize that had we interviewed other experts or reviewed other sources that other practices may have been identified as leading. We also recognize that diversity management practices are dynamic in nature and other practices that were not cited by a majority of our sources may, over time, achieve greater acknowledgment. In addition, we did not evaluate the effectiveness of the cited practices, although many of these practices are consistent with practices identified in prior GAO reports on human capital management.¹

Objective 2: Identifying Examples of Leading Diversity Management Practices in the Federal Government

To identify agency examples of leading practices in the federal government, we reviewed diversity management literature and met with officials from NAPA and others who directed us to agencies that may have implemented some of the expert-identified practices. Through our literature search, we located a 2001 paper by Dr. J. Edward Kellough of the University of Georgia and Dr. Katherine Naff of San Francisco State University.² This paper ranked federal agencies' diversity management programs based on results from a 1999 governmentwide survey,³ which was administered to 160 agencies and subagencies.⁴ We used this paper for selecting federal

¹See, for example, GAO, *A Model of Strategic Human Capital Management*, GAO-02-373SP (Washington, D.C.: Mar. 15, 2002); GAO, *Management Reform: Elements of Successful Improvement Initiatives*, T-GGD-00-26 (Washington, D.C.: Oct. 15, 1999); and GAO, *Senior Executive Service: Enhanced Agency Efforts Needed to Improve Diversity as the Senior Corps Turns Over*, GAO-04-123T (Washington, D.C.: Oct. 15, 2003).

²J. Edward Kellough and Katherine C. Naff, "Managing Diversity in the Federal Service: An Examination of Agency Programs," paper prepared for presentation at the Sixth National Public Management Research Conference, October 18-20, 2001, School of Public and Environmental Affairs, Indiana University, Bloomington, Indiana. Subsequently, the paper was published as an article—J. Edward Kellough and Katherine C. Naff, "Responding to a Wake-Up Call: An Examination of Federal Agency Diversity Management Programs," *Administration & Society*, Vol. 36, No. 1 (2004): pp. 62-90.

³This survey was conducted by the National Partnership for Reinventing Government's (NPR) Diversity Task Force.

⁴Subagencies are components of larger agencies and departments. For example, the National Institutes of Health is a subagency of the Department of Health and Human Services.

agencies because it employed a systematic methodological approach for gauging agencies' diversity management programs. Through our literature search, we found no other research subsequent to the paper that assessed agencies' diversity management programs using a systematic methodological approach that covered a large number of agencies and subagencies. Of the organizations responding to the governmentwide survey, 138, or 86 percent, returned usable questionnaires. These organizations represented more than 80 percent of the federal civilian workforce, including components from the 23 largest departments and agencies as well as the U.S. Postal Service and most of the smaller agencies.

In their paper, Drs. Kellough and Naff identified five separate aspects of agencies' diversity management programs that address

- characteristics of diversity training efforts,
- internal communications regarding programs,
- accountability for diversity,
- activities reflective of broader resource commitments to the programs, and
- the scope of programs in terms of the dimensions of diversity addressed.

Drs. Kellough and Naff assigned scores by summing agency responses to each of the relevant survey items.⁵ From the Kellough-Naff list, we chose the 10 agencies with the highest summary ranking to examine in more

⁵In the summer of 2001, Drs. Kellough and Naff conducted follow-up interviews with a small sample of agencies with diversity programs at various levels of development. However, the authors did not verify all of the agencies' responses to the NPR survey to determine whether agency responses were an accurate portrayal of their diversity programs.

detail.⁶ These agencies were the U.S. Coast Guard, National Institute of Standards and Technology, the Department of Veterans Affairs (headquarters), Federal Bureau of Prisons, U.S. Postal Service, National Oceanic and Atmospheric Administration, Veterans Health Administration, Food and Drug Administration, Federal Aviation Administration, and National Institutes of Health.

We developed a list of topics related to diversity management practices to facilitate our discussion with agency officials. The list included identification of leading diversity management practices, definition of diversity, measures of success, barriers to implementation, and examples of leading practices that have been implemented. We provided the list to each agency. For some agencies, when we were able to obtain information on their diversity management practices before meeting with them, we developed more extensive questions. We then conducted interviews with officials from these agencies who were responsible for diversity management and equal employment opportunity (EEO). During these interviews, we covered the material on the list, and agency officials described what they considered to be the agencies' leading diversity management practices. Agency officials also provided documents that illustrated their agencies' diversity management efforts, including the expert-identified practices.

The agency examples of diversity management practices in this report do not represent all the potential ways that an agency can implement diversity management initiatives or address the specific diversity management practice being discussed. Because our review objectives did not include evaluating the effectiveness of agencies' implementation of diversity management practices, we did not evaluate the effectiveness of the agency examples. Further, the fact that an agency is profiled to illustrate the

⁶As discussed with the requester's office, because of the recent passage of the Department of Defense human capital legislation and other legislation giving the Department of Defense the authority to carry out a pilot program to improve its equal employment opportunity complaint process, we did not include any Department of Defense agencies in our review. See sec. 1101 of Title XI of Division A, Pub. L. No. 108-136, 117 Stat. 1392, 1621-1633 (Nov. 24, 2003) and sec. 1111 of Title XI of Division A, Pub. L. No. 106-39, 114 Stat. 1654, 1654A-312 (Oct. 30, 2000), respectively. Under the latter legislation, GAO is to evaluate the pilot. Therefore, although the Office of the Secretary of the Army was ranked tenth on the Kellough-Naff list, it was not included in our review. Also, according to an official from the Department of Veterans Affairs, the Veterans Benefits Administration, which was ranked fourth on the Kellough-Naff list, was in transition and had just started its new diversity effort after "bringing in new people." The top 10 agencies selected reflect the omission of these 2 agencies from their original ranking in the Kellough-Naff list.

implementation of a particular diversity management practice is not meant to imply agency success or lack of success in the implementation of other diversity management practices or diversity management overall.

We did our work in Washington, D.C., between July 2003 and October 2004, in accordance with generally accepted government auditing standards.

Summary of Selected Antidiscrimination Laws

Over the past 40 years, Congress has enacted a number of laws prohibiting employment discrimination with the intent of ensuring equal opportunity in employment, both in the public and private sectors.¹ Among these enactments is Title VII of the Civil Rights Act of 1964,² amended in 1972 to include the federal sector, which makes it illegal for employers to discriminate against their employees or job applicants on the basis of race, color, religion, sex, or national origin.³ The 1972 amendment also requires federal agencies to maintain an affirmative program of equal employment opportunity.⁴

Section 501 of the Rehabilitation Act of 1973, as amended, prohibits discrimination against qualified individuals with disabilities who work or apply to work in the federal government and requires federal agencies to prepare affirmative action plans.⁵ Title I of the Americans with Disabilities Act (ADA) of 1990 prohibits employment discrimination against qualified individuals with disabilities in the private sector and in state and local governments.⁶ In 1992, the Rehabilitation Act was amended to adopt the ADA standards in determining whether a federal employer engaged in prohibited discrimination.⁷

The Age Discrimination in Employment Act of 1967, amended in 1974 to include the federal sector, prohibits employment discrimination against individuals who are 40 years of age or older.⁸

¹These equal opportunity in employment laws also serve to protect individuals from retaliation for filing discrimination complaints and other protected activity.

²Pub. L. No. 88-352, 78 Stat. 241, 253-266 (July 2, 1964).

³See 42 U.S.C. secs. 2000e-20000e-17.

⁴Pub. L. No. 92-261, sec. 11, 86 Stat. 103, 111-112 (Mar. 24, 1972). See 42 U.S.C. sec. 2000e-16(b).

⁵Pub. L. No. 93-112, 87 Stat. 355, 390-391 (Sept. 26, 1973). See 29 U.S.C. sec. 791.

⁶Pub. L. No. 101-336, 104 Stat. 327, 330-337 (July 26, 1990). See 42 U.S.C. secs. 12111-12117.

⁷Pub. L. No. 102-569, sec. 503(b), 106 Stat. 4344, 4424 (Oct. 29, 1992). See 29 U.S.C. sec. 791(g).

⁸Pub. L. No. 90-202, 81 Stat. 602 (Dec. 15, 1967), amended by Pub. L. No. 93-259, sec. 28, 88 Stat. 55, 74-75 (Apr. 8, 1974). See 29 U.S.C. secs. 621-634.

Appendix II
Summary of Selected Antidiscrimination
Laws

The Equal Pay Act of 1963 protects men and women who perform substantially equal work in the same establishment from sex-based wage discrimination.⁹

⁹Pub. L. No. 88-38, 77 Stat. 56 (June 10, 1963). See 29 U.S.C. sec 206(d).

Recognized Experts

Susan Black
Vice President, Catalyst, Canada

Todd Campbell
Diversity Initiative Manager,
Society for Human Resource Management

Taylor H. Cox, Jr.*
CEO, Taylor Cox Associates

John P. Fernandez*
President,
Advanced Research Management Consultants

Edie Fraser
President, Diversity Best Practices

Lee Gardenswartz & Anita Rowe*
Partners, Gardenswartz & Rowe

Carol A. Hayashida
Former Deputy Director,
Center for Human Resources Management
National Academy of Public Administration

Robert C. Holland*
Director, Diversity Analysis Research Team,
SEI Center for Advanced Studies in Management,
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Karen A. Jehn*
Faculty Coordinator of the George Harvey Program
for Redefining Diversity, Wharton School,
University of Pennsylvania

J. Edward Kellough
Director, Department of Public Administration and Policy,
University of Georgia

Ann M. Morrison*
Honorary Senior Fellow, Center for Creative Leadership

Appendix III
Recognized Experts

Katherine C. Naff
Associate Professor, Department of Public Administration,
San Francisco State University

Nancy Nelkin
Director Audit Services,
Equal Employment Advisory Council

Jeffrey A. Norris
President, Equal Employment Advisory Council

Al Ressler
Former Director, Center for Human Resources Management,
National Academy of Public Administration

Myra Howze Shiplett
President, Randolph Morgan Consulting, LLC

Pete Smith
Former President, Private Sector Council¹

R. Roosevelt Thomas, Jr.
President, The American Institute for Managing Diversity

Mauricio Velasquez*
President, The Diversity Training Group

Jo Weiss
Former Vice President of
Advisory Service and Member Relations,
Catalyst

Trevor Wilson
President, TWI, Inc.

We also spoke with officials from and reviewed publications of the U.S. Equal Employment Opportunity Commission, the U.S. Office of Personnel Management, and the Corporate Leadership Council. For experts with an

¹As of September 1, 2004, the Private Sector Council merged with the Partnership for Public Service, a nonpartisan, nonprofit organization dedicated to revitalizing government service.

Appendix III
Recognized Experts

asterisk by their names (*), we reviewed their publications but did not interview them.

Comments from the Equal Employment Opportunity Commission

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, D.C. 20507

December 16, 2004

The Honorable David M. Walker
Comptroller General of the United States
U. S. Government Accountability Office
Washington, D.C. 20548

Dear Mr. Walker:

Thank you for the opportunity to review and comment on the draft report, *Diversity Management: Expert-Identified Leading Practices and Agency Examples (GAO-05-90)*.

I commend you for identifying leading diversity management practices and their use in the federal government. Expanding agency knowledge of the available tools to achieve diversity is critical to the government's success in maintaining a workplace that is inclusive and responsive to the needs of an increasingly diverse workforce.

The agency examples included in the report should demonstrate the principles of workforce diversity. Federal agencies can learn from the experiences and successes of others. While this report will assist in that effort, additional studies are clearly needed to explore this area in more depth.

EEOC believes that Management Directive-715 will be an invaluable tool to help agencies to improve their workforce diversity and could assist in this effort. As you know, EEOC expects to begin receiving federal agency MD-715 reports beginning in January, 2005 and EEOC can begin providing data that would facilitate GAO's knowledge base in such an evaluation. In short, future studies of this area are warranted to evaluate whether the identified diversity management practices have actually achieved or improved workforce diversity in general or in the federal agencies covered.

One of the nine important factors to diversity management GAO cites is "measurement." A future study could also examine initiatives to measure diversity and how particular measures relate to the cited practices. Because GAO reports are widely read throughout the federal government and viewed as being highly authoritative, and because there are so few reports on diversity in the federal sector, future studies could explore in more depth the effectiveness of leading diversity practices.

**Appendix IV
Comments from the Equal Employment
Opportunity Commission**

The Honorable David M. Walker
Page Two

This report defines diversity as the ways in which people in a workforce are similar and different from each other, including race, ethnicity, gender, age, background, education, work role and personality. A future report might provide a discussion of the means through which agencies can determine how the multitude of similarities and differences that individuals bring to the workplace are important to creating a "high performance organization" with "a positive work environment where . . . all can reach their potential and maximize their contributions to an organization's strategic goals and objectives."

Such a study would be a valuable supplement to this report. Several organizations in this area could be consulted in studying the relationships among these variables such as Diversity Inc. and the National Multicultural Institute. Diversity Inc, for example, periodically publishes various lists showing the top companies for diversity and which also purport to show a relationship between diversity and profitability.

Again, thank you for the opportunity to submit the EEOC's views on your draft report.

Sincerely,



Carlton M. Hadden
Director, Office of Federal Operations

Comments from the Office of Personnel Management



OFFICE OF THE DIRECTOR

UNITED STATES
OFFICE OF PERSONNEL MANAGEMENT
WASHINGTON, DC 20415-1000

DEC 23 2004

U.S. Government Accountability Office
Mr. J. Christopher Mihm
Managing Director, Strategic Issues
441 G Street, NW
Washington, DC 20548

Dear Mr. Mihm:

Thank you for the opportunity to comment on the Government Accountability Office's (GAO) draft "Diversity Management: Expert-Identified Leading Practices and Agency Examples Report." The agencies you have identified certainly merit recognition for their efforts in diversity management.

In reviewing the report itself, we found one typographical error related to the Office of Personnel Management (OPM). On page 5 of the report, the last sentence of the paragraph needs a slight revision. The last line currently reads as "is responsive to the needs of diverse employees as a critical success factor." In fact, it should read as "is responsive to the diverse needs of employees as a critical success factor." We apologize for the confusion. This error exists on the web page and we intend to address it at the next opportunity to update President's Management Agenda (PMA) materials.

In addition, a footnote that appears at both pages 7 (note 18) and 21 (note 60) is not completely accurate in its description of the Presidential Management Fellows Program. A more accurate description would be as follows:

"The Presidential Management Fellows Program is a governmentwide program administered by OPM. The Program has two components: Presidential Management Fellows (PMFs) and Senior Presidential Management Fellows (SPMFs). Colleges and universities conduct the nomination process for PMFs, while individuals with the requisite qualifications may apply directly to be an SPMF. OPM conducts the selection process for finalists. Individual agencies make the ultimate hiring decisions for the Fellows' 2-year appointments."

We observe that the report contains a strong emphasis on the notion of individual accountability for the "progress" of diversity initiatives. (See, e.g., "Highlights" page and pages 4 and 6.) While we believe that the initiatives GAO describes touch upon a broad range of initiatives, rather than focusing upon achieving particular numbers or percentages with respect to particular groups, it would be advisable to caution that whatever efforts an agency undertakes must be consistent with the Constitution, applicable law, and binding judicial precedent and that agencies have a continuing obligation to honor the merit principles in effecting personnel decisions.

CON 131-e4-4

Appendix V
Comments from the Office of Personnel
Management

Mr. J. Christopher Mihm

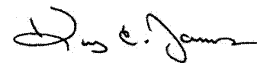
2

Finally, it is also important to note that President George W. Bush's Management Agenda has had a dramatic impact on the governmentwide commitment to building a Federal workforce that is drawn from the rich diversity of this Nation. An important element of the PMA is in the area of diversity. It is no accident that organizations' efforts on diversity-related matters are tracked as a part of the performance culture standard of the Human Capital Assessment and Accountability Framework. This framework includes six standards that represent the Strategic Management of Human Capital element of the PMA.

Every Federal agency is measured by its actions in the Human Capital initiative, a major component of which is workforce diversity. As a part of the quarterly scoring process, agencies are assessed on performance indicators including their strategies with respect to diversity-related efforts. Agencies cannot achieve or maintain a "green" score without demonstrating they have strategies to attempt to improve and/or maintain diversity within their workforce. As never before, agencies governmentwide are focusing on the diverse needs of their employees. This is a direct result of the efforts of President Bush and the requirements of his management agenda to achieve success.

We are hopeful that you will find this information useful in revising your draft report. Once again, we thank you for the opportunity to comment on the draft report.

Sincerely,



Kay Coles James
Director

GAO Contact and Staff Acknowledgments

GAO Contact

George H. Stalcup, (202) 512-9490

Acknowledgments

In addition to the individual named above, Karin K. Fangman, Eric Gorman, Emily Hampton-Manley, Sharon Hogan, Belva Martin, Kiki Theodoropoulos, Michael R. Volpe, and Gregory H. Wilmoth made key contributions to this report.

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