

Report to the Chairman, Committee on Veterans' Affairs, House of Representatives

February 1989

DISABLED VETERANS' EMPLOYMENT

Performance Standards Needed to Assess Program Results





United States General Accounting Office Washington, D.C. 20548

General Government Division

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The Honorable G. V. (Sonny) Montgomery Chairman, Committee on Veterans' Affairs House of Representatives

Dear Mr. Chairman:

This report presents information on the effectiveness of the Disabled Veterans' Affirmative Action Program at the Department of Labor, the Department of Health and Human Services, the National Aeronautics and Space Administration, the Office of Management and Budget, and the Office of Personnel Management. It also analyzes the Office of Personnel Management's oversight of the program.

Copies of this report, which was prepared under the direction of Bernard L. Ungar, Director, Federal Human Resource Management Issues, are being sent to the Secretary of Labor; the Secretary of Health and Human Services; the Administrator, National Aeronautics and Space Administration; the Director, Office of Management and Budget; the Director, Office of Personnel Management; and other interested parties. Other major contributors to this report are listed in appendix V.

Sincerely yours,

Richard L. Fogel

Assistant Comptroller General

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Purpose

The Chairman of the House Committee on Veterans' Affairs, concerned that federal agencies may not be doing all they can to hire and advance disabled veterans, asked GAO to review disabled veteran programs at five agencies: the Department of Labor (DOL), the Department of Health and Human Services (HHS), the National Aeronautics and Space Administration (NASA), the Office of Management and Budget (OMB), and the Office of Personnel Management (OPM). He also wanted to know if OPM, as the governmentwide program manager, needed to improve its oversight of program operations.

Background

The Vietnam Era Veterans' Readjustment Assistance Act of 1974 requires federal agencies "to promote the maximum of employment and job advancement opportunities within the federal government for qualified disabled veterans and veterans of the Vietnam era." To this end, the act requires agencies to prepare affirmative action plans and accomplishment reports for hiring and advancing disabled veterans under the Disabled Veterans Affirmative Action Program. In addition, OPM is required to review and evaluate agencies' plans and accomplishment reports and prepare an annual report to Congress on program activities.

OPM regulations require agencies' plans and reports to be based on detailed analysis and assessment of the status of disabled veterans' employment and advancement. In formulating the regulations, OPM advised agencies that they were expected to show measurable improvements in their disabled veteran employment profiles. However, neither the law nor regulations provide specific performance standards or other criteria for measuring success. (See p. 16.)

Results in Brief

Without specified performance criteria, it is not possible to conclusively determine to what extent agencies' disabled veterans' programs have been successful or unsuccessful. However, GAO used a variety of measurements, comparisons, and analyses that it believes, when taken together, suggest that the five agencies could do more to promote the employment and advancement of disabled veterans.

Overall, GAO found mixed results among the five agencies. While the DOL and OPM programs were more successful at employing and advancing disabled veterans than were programs at HHS, NASA, and OMB, all five agencies' disabled veteran employment rates declined from 1982 to 1987.

Neither OPM as governmentwide program manager nor any of the five agencies did the analyses needed to define and correct problems in employing and advancing disabled veterans. Program coordinators in the five agencies were responsible for providing program leadership, but a majority believed the program was falling short of achieving its objectives.

GAO's Analysis

Disabled Veterans in Five Agencies Compared to Indicators

GAO obtained data on five dimensions of agency performance in employing and advancing disabled veterans. The five dimensions were: overall employment trends and rates, employment rates for 30-percent or more disabled veterans, promotion rates, new hire rates, and use of special hiring authorities. The five agencies' performances were then compared with 16 indicators of governmentwide or national performance in these same five areas. DOL scored positively on 11 of these indicators, OPM on 9, HHS on 3, and NASA on 2; OMB did not score positively on any. (See p. 17.)

For example, despite OPM's expectation that agencies would make measurable improvements in their disabled veteran employment profiles, disabled veterans employed at all five agencies actually decreased from 1982 to 1987. In addition, all five agencies were below the average percentage of disabled veterans employed governmentwide during this period. However, DOL and OPM exceeded the reduced governmentwide average when the largest disabled veteran employers, the Postal Service, the Department of Defense, and the Veterans Administration, were subtracted from the base. (See p. 19.)

During fiscal years 1982 through 1987, disabled veterans represented from 6.0 to 6.3 percent of all federal employees, and from 0.2 to 4.9 percent of the employees in the five agencies GAO reviewed. The governmentwide employment rates for disabled veterans in 1985 and 1987 were more than five times their percentage share of the national labor force. When the Postal Service, the Department of Defense, and the Veterans Administration were subtracted from the governmentwide figures, the resulting disabled veteran employment rate for the rest of the government was about double the national rate. The difference between the governmentwide and national employment rates is not surprising given the government's legislative mandate "to promote the

maximum of employment \dots opportunities for \dots disabled veterans." (See p. 22.)

The percentage increase in the number of disabled veteran employees in the federal government from fiscal year 1982 through 1987 was comparable to the increase of other federal employees. While overall employment levels in hhs, omb, dol, and opm decreased during this 6-year period, the rate of decline for disabled veterans exceeded the rate of decline for other employees in all four agencies. At the same time, NASA's disabled veteran population dropped by 33 percent, while its other employees increased by 3.2 percent. (See p. 21.)

Disabled veterans are an aging population and according to Bureau of Labor Statistics' studies, the number of unemployed but employable disabled male veterans dropped from 99,000 in 1985 to 67,000 in 1987. However, their unemployment rates were higher than the rates for all male veterans during the same periods. (See p. 23.)

The governmentwide promotion rate for disabled veterans compared with other government employees in fiscal year 1986 was 83 percent. Agency comparative rates were 103 percent at OPM, 95 percent at DOL, 71 percent at NASA, and 63 percent at HHS. OMB did not promote either of the two disabled veterans it employed during the year. (See p. 28.)

Shortcomings in Agency Plans and OPM Oversight

Regulations require agencies to analyze workforce information to identify problems in their employment and advancement of disabled veterans. None of the agencies GAO reviewed had based its plans and reports on such detailed analyses. (See p. 29.)

With some exceptions, the agencies' plans included elements required by OPM, such as agency policies, leadership responsibilities, employment status, advancement opportunities afforded to disabled veterans, and recruitment methods. However, the plans and accomplishment reports were so general that they were of little use to GAO in evaluating the agencies' programs. OPM's reviews of agencies' plans and reports focused on whether required elements were included. OPM officials said that they were not evaluating the content of agencies' plans and reports because of the law's lack of performance criteria. (See p. 30.)

Perceptions of Program Coordinators in Five Agencies

The five agencies employed a total of 61 coordinators to provide program leadership. Most reported working on the program for at least 2 years. The majority told GAO that they (1) spent less than 10 percent of their time on the program; (2) were not specifically evaluated on their program activities in their annual performance appraisals, contrary to OPM instructions; and (3) perceived the program as falling short of achieving its purpose. About one-half said that they had received no program training, and some were unfamiliar with or did not use basic tools available for employing disabled veterans, such as special appointing authorities and veterans representatives in state employment offices. (See p. 37.)

Recommendations

GAO recommends that OPM develop, with agency assistance, the criteria and analyses needed for measuring and reporting to Congress agencies' disabled veteran employment and advancement performance. GAO also makes recommendations designed to assure the training and evaluation of program coordinators. (See pp. 35 and 44.)

Agency Comments

GAO discussed its findings and recommendations with OPM, DOL, HHS, NASA, and OMB officials, who generally agreed with the facts and supported the recommendations. OPM officials also said that GAO (1) identified gaps in the Disabled Veterans' Affirmative Action Program and (2) suggested worthwhile ways to improve the program. The other agencies' officials said that they would welcome the opportunity to work with OPM to develop the criteria needed for measuring disabled veteran employment and advancement performance. Generally, they agreed that evaluation of agency progress would benefit the program. (See pp. 35, 36, and 44.)

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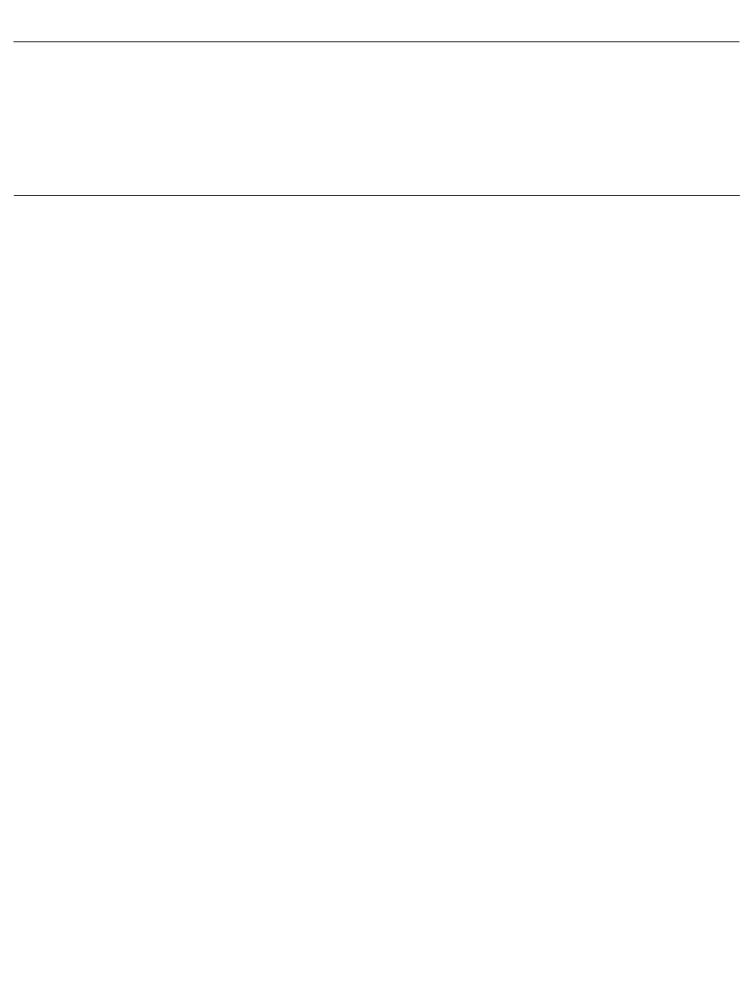
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Abbreviations

BLS	Bureau of Labor Statistics
CPDF	Central Personnel Data File
DOD	Department of Defense
DOL	Department of Labor
DVAAP	Disabled Veterans' Affirmative Action Program
EEOC	Equal Employment Opportunity Commission
HHS	Department of Health and Human Services
NASA	National Aeronautics and Space Administration
OMB	Office of Management and Budget
OPM	Office of Personnel Management
USPS	United States Postal Service
VA	Veterans Administration
VRA	Veterans Readjustment Appointments



Introduction

Because he was concerned that federal agencies may not be effectively carrying out the law, the Chairman of the House Committee on Veterans' Affairs asked us to review five agencies' employment and advancement of disabled veterans as required by section 403 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 2014). The five agencies specified by the Chairman were the Department of Labor (DOL), the Department of Health and Human Services (HHS), the National Aeronautics and Space Administration (NASA), the Office of Management and Budget (OMB), and the Office of Personnel Management (OPM). In an earlier report, we examined the disabled veterans employment and advancement program at the Tennessee Valley Authority.¹ On the basis of subsequent discussions with the Committee, we also agreed to look at OPM oversight of agencies' programs.

Disabled Veterans' Affirmative Action Program

According to 38 U.S.C. 2014(a), the policy of the United States is "to promote the maximum of employment and job advancement opportunities within the Federal Government for qualified disabled veterans and veterans of the Vietnam era." Subsection 2014(c) requires that executive branch agencies prepare affirmative action plans for the hiring and advancement of disabled veterans under the Disabled Veterans' Affirmative Action Program (DVAAP).² The statute requires OPM to monitor and evaluate agencies' implementation of this section, as well as to provide technical assistance to the agencies.

Federal regulations (5 C.F.R. 720.301-305) set out specific requirements for agencies' damp plans, including their content and reporting requirements. Regulations require that each agency annually certify in writing to opm by December 1 that it has an up-to-date agencywide plan. Agencies are not required to submit these plans to opm unless requested. Plans must include the agency's policy on the employment and advancement of disabled veterans, especially those who are 30-percent or more disabled; assessment of the current status of disabled veteran employment within the agency; and description of how the agency will recruit

¹Veterans' Employment: TVA Can Improve Its Disabled Veterans' Affirmative Action Program (GAO/HRD-87-17, Dec. 31, 1986)

²As used in DVAAP, the term "disabled veteran" means a veteran who is entitled to compensation under laws administered by the Veterans Administration (VA) or a person who was discharged or released from active military duty because of a service-connected disability.

³Disability ratings represent the "average impairment in earning capacity" resulting from diseases and injuries and their residual conditions in civilian occupations. The disability status must be determined by the VA or the Department of Defense and range on a scale of 0 to 100 percent as determined from a rating schedule published in the U.S. Code of Federal Regulations, title 38, part 4.

and provide internal advancement opportunities to disabled veterans. The agency must also describe how it will inform its staff in charge of employing and advancing disabled veterans of their responsibilities, and how it will monitor, review, and evaluate their efforts. In addition, each agency is required to submit annually to OPM, not later than December 1, an accomplishment report on the results of its plan for the previous fiscal year. Regulations also require agencies to analyze data on their employment of disabled veterans to use in developing methods to improve recruiting strategies, hiring, and advancement of disabled veterans.

OPM's DVAAP Responsibilities

On October 1, 1982, OPM received oversight responsibility for executive agencies' DVAAP plans. Previously, the Vietnam Era Veterans' Readjustment Assistance Act of 1974 had assigned this responsibility to the Civil Service Commission, OPM's predecessor. Later, Executive Order 12106 (1978) transferred various equal employment opportunity enforcement functions, including DVAAP, from the Civil Service Commission to the Equal Employment Opportunity Commission (EEOC). In October 1980, Congress amended 38 U.S.C. 2014 and assigned OPM responsibility for planning, implementing, and overseeing DVAAP. OPM and EEOC shared responsibility for DVAAP during fiscal year 1982.

A federal regulation (5 C.F.R. 720.306) requires opm to monitor agency dyaap implementation through review of agency plans, direct agency contact, review of employment data, and other appropriate means. Opm is to do on-site evaluations of program effectiveness, both at agency headquarters and at field installations or operating components. In addition, opm is to provide technical assistance, guidance, instructions, data, and other information to supplement and support agencies' dyaaps. Also, opm is required to report to Congress each year on the program's progress. The reports should include specific assessments of agency progress in meeting dyaap objectives.

How VA and DOL Help Disabled Veterans Find Employment

In addition to agency and **OPM** DVAAP responsibilities, VA and DOL are involved in a variety of programs nationwide to help disabled veterans find jobs and training opportunities both in the public and private sectors.

Va has overall responsibility for promoting the effective implementation, enforcement, and application of laws and regulations aimed at enhancing employment, training, and other opportunities for veterans. Veterans with employment problems are counseled and given job assistance at Career Development Centers in VA's regional offices. These centers are designed to provide veterans with full career development training, including evaluation, counseling, and referral services.

va regional offices also run a Vocational Rehabilitation and Counseling Service that is to assist veterans with service-connected disabilities become independent and employable and find suitable employment. Staff members are to identify eligible service-connected disabled veterans and encourage them to apply for assistance. Applicants are to be evaluated to determine if they need education or training to provide them with job skills, placement, or other employment assistance.

▶ L's Veterans Employment and Training Service is responsible for maximizing veterans' employment and training opportunities, with priority to disabled veterans and veterans of the Vietnam era. Through grants to state employment agencies, Local Veteran Employment Representatives and Disabled Veteran Outreach Program Specialists carry out these activities.

Local Veteran Employment Representatives, in cooperation with the Veterans Employment and Training Service, are to ensure that state employment agencies comply with federal regulations, performance standards, and grant agreements regarding veterans. The Local Veteran Employment Representatives are located at state employment offices and are to maintain regular contact with employers and veterans' advocacy groups.

Disabled Veteran Outreach Program Specialists were authorized by the Veterans Rehabilitation and Education Amendments of 1980 (38 U.S.C. 2003A). Each state employment agency receiving federal grant money under that statute is required to appoint one specialist for every 5,300 Vietnam veterans and disabled veterans residing in the state. Specialists must be veterans, with preference given to Vietnam and other disabled veterans. Generally, no more than 75 percent of these specialists are

allowed at state employment offices. The remaining specialists must be stationed at centers established through agreements among the state, VA, and DOL. They have duties similar to those of regular state employment staff but are required to direct their efforts to disabled and other veterans.

In addition to these programs, a DOL advisory committee, known as the Secretary's Committee on Veterans' Employment, was established by the Veterans' Compensation, Education and Employment Amendments of 1982 (38 U.S.C. 2010). The Committee is to meet at least quarterly to bring veterans' employment problems to the attention of the Secretary of Labor. The Secretary of Labor chairs the Committee with the Assistant Secretary of Labor for Veterans' Employment and Training serving as vice-chairman. Committee members include representatives from VA, DOD, HHS, OPM, EEOC, and Small Business Administration. Congressionally chartered veterans' organizations with national employment programs also have representatives on the Committee. These organizations include the American Legion, Veterans of Foreign Wars, Disabled American Veterans, Paralyzed Veterans of America, Blinded Veterans Association, Amvets, Military Order of the Purple Heart, and the Vietnam Veterans of America.

Objectives, Scope, and Methodology

The objectives of this review were to (1) determine the effectiveness of DOL, HHS, NASA, OMB, and OPM's employment and advancement programs for disabled veterans and (2) examine how effectively •PM monitored and provided overall direction to the program and whether OPM's oversight needs improvement.

We did our review in accordance with generally accepted government auditing standards. Our review was done primarily at the headquarters of the five agencies in Washington, D.C., and we discussed the report's contents with officials responsible for DVAAP in each agency. Their views are included on pages 35, 36, and 44. In addition, we contacted EEOC officials in Washington, D.C., to determine how they monitor affirmative action programs.

To determine the results the five agencies were achieving through DVAAP, we gathered data on their employment levels of disabled veterans during fiscal years 1982 through 1987. In addition, we gathered data on hiring, use of special hiring authorities, promotions, and terminations of disabled veterans in the five agencies during fiscal years 1976, 1981, and 1986. OPM provided these data from the Central Personnel Data File

(CPDF) but cautioned us that the data should be viewed as indicators only since it is a reporting system dealing with population statistics and is not an accounting system. Our governmentwide employment figures and comparisons include postal employees only when the data were available in OPM's annual DVAAP reports to Congress. The CPDF does not contain employment data for the Postal Service. However, neither the file nor the OPM reports contain separate promotion data on Postal Service employees so that our governmentwide promotion figures exclude the Postal Service. We did not make a reliability assessment of the file data. Appendix I provides an explanation of this data coverage.

We researched the legislative history of 38 U.S.C. 2014; reviewed EEOC guidelines on assessing minority representation levels; and reviewed 1986 and 1988 DOL studies on veterans employment, including data on unemployed disabled veterans. We did not survey the labor market to determine the number of disabled veterans who were available and qualified to be hired, or where such disabled veterans might be located. Although DOL and VA had some general nationwide data on disabled veterans, neither agency had current data, by geographic location, on the availability or skills of disabled veterans.

We interviewed DVAAP coordinators in the headquarters of each of the five agencies to determine how they prepared their plans and accomplishment reports. We compared the elements in their plans (for fiscal years 1984 through 1988) and accomplishment reports (for fiscal years 1984 through 1987) with regulatory requirements.

To determine how agencies implemented their plans, we sent a questionnaire to all 61 headquarters and field officials responsible for implementing DVAAP in the five agencies. The purpose of the questionnaire was to collect information about the agencies' practices on recruiting, hiring, and advancing disabled veterans under DVAAP. All 61 officials completed the questionnaire.

We interviewed officials from OPM's Office of Affirmative Recruiting and Employment to determine how they monitored agencies' implementation of DVAAP and reviewed OPM's records on their monitoring of DVAAP.

Neither the law establishing DVAAP nor the implementing regulations provide performance standards or other criteria for measuring employment and advancement of disabled veterans. The legislative history of the law establishing the DVAAP indicates that Congress did not establish such standards or criteria because the extent of the disabled veteran employment and advancement problem was unknown. Similarly, OPM's DVAAP regulations do not require agencies to set goals and timetables for their disabled veteran programs. Without specific performance criteria, it is impossible to know whether agencies' disabled veterans' programs have been successful or not.

Because performance standards were not established, we obtained data on five dimensions and used a number of indicators to gauge the results of the agencies' employment and advancement of disabled veterans. The five dimensions were: overall employment trends and rates, employment rates for 30-percent or more disabled veterans, new-hire rates, promotion rates, and use of special hiring authorities. These indicators showed mixed results among the five agencies, with DOL and OPM faring better than HHS, NASA, and OMB.

Agency officials said, and data confirm, that governmentwide disabled veteran employment averages were dominated by the United States Postal Service (USPS), Department of Defense (DOD), and VA. They also believed that these agencies had unique attributes, such as mission-relatedness, more immediate access, and greater hiring opportunities, that gave them advantages over other agencies in employing disabled veterans. Since information was not readily available for use in evaluating these assertions, where possible we used separate indicators with, and without, USPS, DOD, and VA statistics.

Agency officials also believed that certain factors reduced their ability to employ disabled veterans, such as (1) limited hiring opportunities; (2) disabled veterans rejecting available entry-level position, especially clerical positions; and (3) disabled veterans' low education levels. They did not, however, provide data to support their contentions. Our analysis of available data showed that the agencies hired a substantial number of employees during the period covered and that disabled veterans have, in fact, been accepting entry-level positions. Although disabled veterans' education levels were lower on the average than were other employees', special hiring authorities are available that, if used, can help overcome this potential employment obstacle.

Performance Standards Not Provided by Law or Regulation

The legislative history of 38 U.S.C. 2014 indicates that Congress wanted to maximize federal government employment and advancement of qualified disabled veterans. To this end, it required agencies to implement affirmative action programs. However, because of insufficient information on the extent of disabled veteran employment and advancement problems, the legislation did not provide agencies with employment and advancement standards or other criteria for measuring program results.

OPM's proposed regulations for DVAAP were published in the Federal Register in 1983. They did not provide agencies with employment and advancement standards or other criteria for measuring program results. According to OPM, it received objections "to the absence of a requirement for goals, timetables and other quantifiable guideposts. Several [agencies] voiced [the] opinion that by not requiring goals and timetables OPM was creating what amounts to be a 'paper tiger." OPM's position was that "By using CPDF data as baseline information, OPM is acknowledging the importance of quantified information. Agencies are expected to show measurable improvement in their disabled veteran employment profiles, and they are free to set goals and timetables for their own programs if they so desire. But they are not required to do so." (Federal Register, vol. 48, no. 2, Jan. 4, 1983, Rules and Regulations.) None of the five agencies in our review established such goals and timetables.

Disabled Veterans in Five Agencies Compared to Indicators

Table 2.1 shows the results obtained from comparing performance data from the five agencies with 16 indicators of governmentwide or national employment and advancement of disabled veterans. While DOL scored positively on 11 of these indicators and OPM on 9, HHS scored positively on 3, and NASA on 2; OMB did not score positively on any.

Performance indicator	DOL	OPM	NASA	HHS	OME
Disabled Veterans' Employment Rates and Trends					
Governmentwide rate (FY 1982 to 1987) ^a		_	_	_	-
Governmentwide rate excluding USPS (FY 1982 to 1987) ^a	+	_	-	-	-
Governmentwide rate excluding USPS, DOD, and VA (FY 1982 to 1987) ^a	+	+	_	_	-
Employment rate in the national workforce (FY 1985 and 1987) ^b	+	+	+	+	-
Governmentwide trend (FY 1982 to 1987) ^c	_	_	-	-	-
Governmentwide trend excluding USPS, DOD, and VA (1982 to 1987) ^c	+	+		+	
Thirty-Percent or More Disabled Veterans' Employment Rates●					
Governmentwide (FY 1982 to 1987)				_	
Governmentwide excluding USPS (FY 1982 to 1987)	+			_	-
Governmentwide excluding USPS, DOD, and VA (FY 1982 to 1987)	+	+		_	
Employment rate in the national workforce (FY 1985 and 1987) ^b	+	+	+	+	-
Governmentwide Disabled Veteran Promotion Rates in FY 1986e.f					
Excluding USPS	+	+		_	
Excluding USPS, DOD, and VA	+	+			
Governmentwide Disabled Veteran "New Hire" Rates in FY 1986 ¹⁹					
Excluding USPS				_	
Excluding USPS, DOD, and VA	+	+	_	_	
Governmentwide Use of Special Hiring Authorities for Disabled Veterans (FY 1984 to 1987) ^h					
Excluding USPS ^f				_	
Excluding USPS, DOD, and VA	+	+			
Total +'s	11	9	2	3	
Total -'s	5	7	14	13	10

Note: "+" means "better than or equal" and "-" means "less than" the standard used in the indicator. aSee page 22

^fGovernmentwide rates including USPS could not be determined because USPS promotion and new hire data were not available for 1986 and USPS does not use the special hiring authorities.

Disabled Veteran Employment Declining

To get an indication of the agencies' employment of disabled veterans, we compared the percentages of all disabled veterans and 30-percent or more disabled veterans employed by DOL, HHS, NASA, OMB, and OPM with

^bSee pages 23 and 24

^cSee page 21.

^dSee page 22

eSee pages 27 and 28

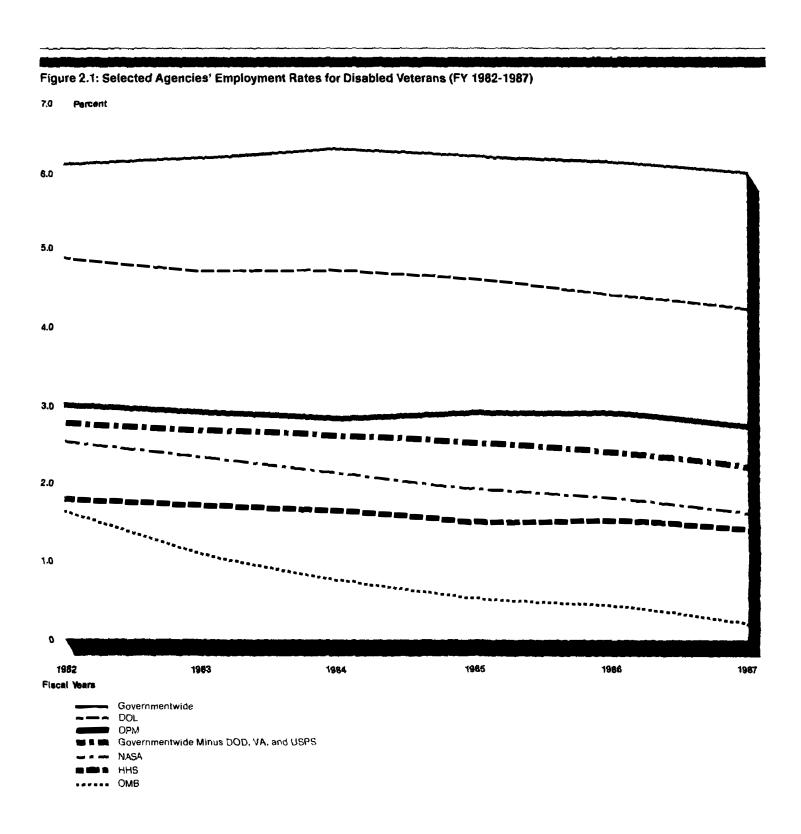
⁹See pages 24 and 25.

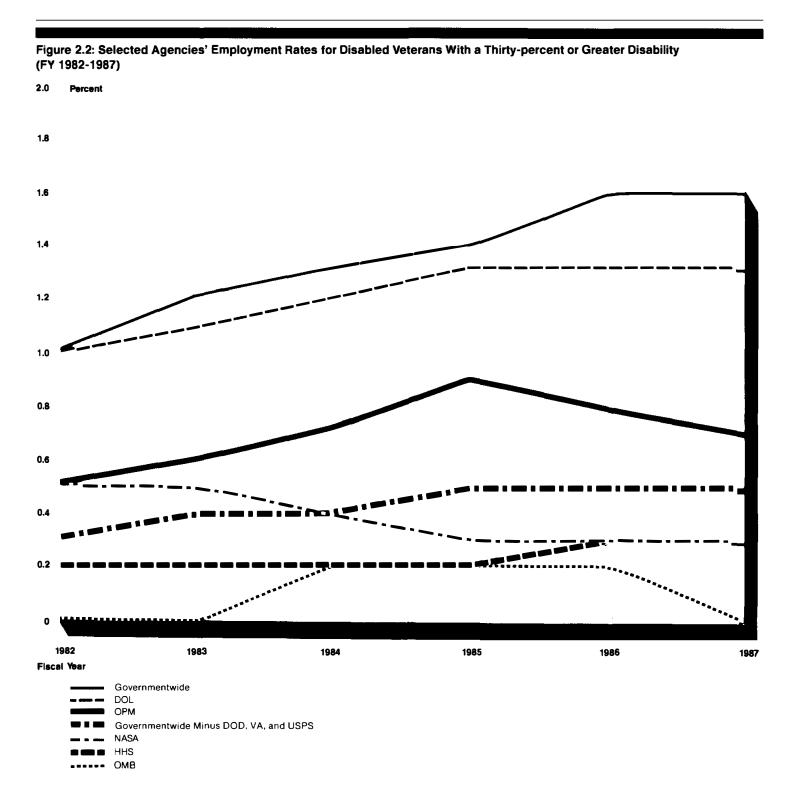
^hSee pages 26, 27, 52, and 53

the overall percentages employed by the federal government during fiscal years 1982 through 1987. None of the five agencies equaled the federal government's disabled veteran employment percentages in the 6-year period. And except for DOL's 1982 performance, none of the five agencies met the percentage of 30-percent or more disabled veterans employed by the federal government in the 6-year period. The results of our analysis for disabled veterans are shown in figure 2.1 and for 30-percent or more disabled veterans in figure 2.2. (The numbers on which these figures are based are contained in table II.1.)

Table 2.2 shows the comparative change in employment levels between fiscal years 1982 and 1987 of disabled veterans and employees who were not disabled veterans at each of the five agencies and governmentwide. Although opm expects agencies to show measurable improvement in their disabled veteran employment profiles, this has not happened with the five agencies. Overall employment levels at hhs, dol, opm, and omb decreased during the period but the rate of decrease for disabled veterans exceeded the rate of decrease for all employees who were not disabled veterans. At NASA, the number of employees who were not disabled veterans increased by 3.2 percent, but the number of disabled veterans decreased by 33 percent.

¹Fiscal year figures and comparisons are as of the end of each fiscal year.





Chapter 2
Assessment of Agencies' DVAAP Performance

Table 2.2: Employment Trends of Disabled Veterans Compared to All Other Federal Employees Governmentwide and in Selected Agencies

		Number of all other	Change 198	32 to 1987	Number of disabled	Change 198	2 to 1987
Agency	FY	employees	Number	Percent	veterans	Number	Percent
Governmentwide	1982 1987	2,558,954 2,735,041	176,087	6.9	167,055 175,675	8,620	5.2
USPS	1982 1987	580,965 683,005	102,040	17.6	72,494 81,928	9,434	13.0
DOD	1982 1987	862,203 936,446	74,243	8.6	56,152 61,301	5,149	9.2
VA	1982 1987	226,823 241,665	14,842	6.5	12,779 12,411	(368)	(2.9)
All agencies except USPS, DOD, and VA	1982 1987	888,963 873,925	(15,038)	(1.7)	25,630 20,035	(5,595)	(21.8)
DOL	1982 1987	18,611 16,928	(1,683)	(9.0)	951 751	(200)	(21.0)
ОРМ	1982 1987	7,206 6,155	(1,051)	(14.6)	223 170	(53)	(23.8)
HHS	1982 1987	141,660 124,495	(17,165)	(12.1)	2,581 1,773	(808)	(31.3)
NASA	1982 1987	22,137 22,846	709	3.2	563 377	(186)	(33.0)
OMB	1982 1987	598 570	(28)	(4.7)	10 1	(9)	(90.0)

Other Disabled Veteran Employment Rates

Because agency officials believed that the governmentwide disabled veteran employment rate was skewed by USPS, DOD, and VA, we also compared disabled veteran employment rates in the five agencies to other employment performance indicators, both including and excluding USPS, DOD, and VA. Tables 2.3 and 2.4 show the employment rates in the five agencies for disabled veterans and 30-percent or more disabled veterans. The highlighted areas indicate where the employment rates were below the governmentwide rate after subtracting USPS, DOD, and VA data.

Table 2.3: Disabled Veterans'
Employment Rates in Selected Agencies
Compared to Other Employment Rates
(Fiscal Years 1982 Through 1987)

	Disabled veterans' employment rates (Fiscal years)								
Agency	1982	1983	1984	1985	1986	1987			
Governmentwide	6.1	6.2	6.3	6.2	6.1	6.0			
USPS	11.1	11.4	11.5	11.2	11.0	10.7			
DOD	6.1	6.1	6.2	6.1	6.2	6.1			
VA	5.3	5.2	5.2	5.0	4.9	4.9			
Governmentwide minus USPS	4.6	4.6	4.6	4.5	4.4	4.4			
Governmentwide minus USPS, DOD, and VA	2.8	2.7	2.6	2.5	2.4	2.2			
DOL	4.9	4.7	4.7	4.6	4.4	4.2			
ОРМ	3.0	2.9	2.8	2.9	2.9	2.7			
NASA	2.5	2.3	2.1	1.9	1.8	1.6			
HHS	1.8	1.7	1.6	1.5	1.5	1.4			
ОМВ	1.6	1.3	0.7	0.5	0.4	0.2			

Table 2.4: Thirty-Percent or More
Disabled Veterans' Employment Rates in
Selected Agencies Compared to Other
Employment Rates (Fiscal Years 1982
Through 1987)

A	30-percent or more disabled veterans'						
Agency		<u>en</u>	nployme	nt rates			
Governmentwide	1.0	1.2	1.3	1.4	1.5	1.5	
USPS	1.8	1.9	2.1	2.2	2.2	2.2	
DOD	1.0	1.3	1.5	1.7	1.8	1.9	
VA	1.2	1.3	1.5	1.6	1.6	1.7	
Governmentwide minus USPS	0.7	0.9	1.0	1.2	1.2	1.3	
Governmentwide minus USPS, DOD,			T				
and VA	0.3	0.4	0.4	0.5	0.5	0.5	
DOL	1.0	1,1	1.2	1.3	1.3	1.3	
ОРМ	0.5	0.6	0.7	0.9	0.8	0.7	
NASA	0.5	0.5	0.4	0.3	0.3	0.3	
HHS	0.2	0.2	0.2	0.2	0.3	0.3	
OMB	0.0	0.0	0.2	0.2	0.2	0.0	

After the rates were reduced by removing USPS, DOD, and VA data, DOL and OPM were consistently above the governmentwide rates from 1982 through 1987. HHS and OMB, however, were consistently below the reduced governmentwide employment rates. NASA was also consistently below the reduced governmentwide disabled veteran employment rate but equaled or exceeded the 30-percent or more disabled veterans employment rate during the first 3 years of the 6-year period, then fell below the last 3 years' rates.

In March 1986, the Bureau of Labor Statistics (BLS) issued its first comprehensive study of disabled male veterans in the national labor force. The study did not include data on disabled women veterans. BIS reported that in April 1985, (1) 99,000 employable disabled male veterans were unemployed; (2) 50,000 of these veterans were Vietnam-era veterans with service-connected disabilities; and (3) one-third of employed Vietnam-era, disabled male veterans worked in government jobs (state, local, and federal). A second BLS study, issued in September 1988 and capturing data from November 1987, showed that (1) 67,000 employable disabled male veterans were unemployed; (2) 39,000 of these were Vietnam-era disabled veterans; and (3) over one-third of employed Vietnam-era disabled veterans were employed in the public sector (state, local, or federal government). However, while the number of unemployed but employable disabled male veterans dropped in this 2 and one-half year period and their unemployment rate dropped from 7.6 percent to 5.4 percent, their unemployment rates were higher than the 5.5 and 4.2 percent rates for all male veterans during the same periods. In addition, during this period, the BLS studies showed a 14-percent increase in the number of disabled male Vietnam-era veterans who were no longer in the labor force.

Using the BIS studies, we computed the percentage of the national labor force occupied by each group. Their percentages in the national labor force were 1.2 and 1.1 percent for disabled male veterans and 0.3 percent (both dates) for 30-percent or more disabled male veterans. Since the BLS studies were on disabled male veterans and do not include complete employment data on disabled women veterans, our computations do not include disabled women veterans. With this stipulation, the governmentwide employment rates for disabled veterans in 1985 and 1987 were more than five times disabled male veterans' percentage of the national labor force, and the governmentwide employment rate for 30-percent or more disabled veterans was over four times their percentage share of the national labor force. These differences between the governmentwide and national employment rates for disabled veterans are not surprising given the government's legislative mandate "to promote the maximum of employment ... opportunities for ... disabled veterans."

When USPS, DOD, and VA (the three agencies with the largest disabled veterans employment populations) were dropped from the governmentwide figures, the resulting disabled veteran employment rate for the rest of the government was about double their national employment rate, and

the 30-percent or more disabled veteran employment rate was about one and one-half times their national employment rate.

New Hire Data Do Not Support Hiring Concerns

We obtained "new hire" data for fiscal years 1983 through 1987 for DOL, HHS, NASA, OPM, and OMB to examine agency officials' statements that hiring limitations were reducing their opportunities to hire disabled veterans. Table 2.5 shows that hiring levels fluctuated from 1983 through 1987, with 1985 a peak hiring year for all agencies followed by a steep decline in 1986. However, by 1987 hiring was again rising in all five agencies. Although HHS' hiring in 1986 and 1987 was lower than in 1985, it hired more than 13,000 people in each year.

Table 2.5: Total New Hires by Agency (Fiscal Years 1983 Through 1987)

					النفيارا
Fiscal year	DOL	HHS	NASA	OPM	OMB
1983	2,161	18,472	2,333	865	114
1984	1,946	19,104	2,053	974	143
1985	2,561	19,104	3,086	1,094	126
1986	1,642	13,024	1,884	755	89
1987	2,606	14,058	2,643	1,258	124
Totals	10,916	83,762	11,999	4,946	596
Average New Hires	2,183	16,752	2,400	989	119

Note: "New Hires" figures are from OPM's annual DVAAP reports to Congress, "New Hires" are defined as new appointments of individuals who currently are not federal civilian employees to positions in the competitive service, excepted service, and Senior Executive Service, including reinstatements on the basis of prior service.

We also used data OPM provided to compare total new hires with disabled veteran new hires. Officials at all five of the agencies we reviewed asserted that since DOD and VA have disabled veteran-related missions and greater access to disabled veterans, they have unique advantages in recruiting them. The officials said that their five agencies' performances should not be expected to equal DOD and VA performance. Therefore, we calculated the disabled veteran hiring rates for DOD and VA, taken together, and the governmentwide rates excluding DOD and VA.

Table 2.6 shows that in 1981 and 1986, DOD and VA hired disabled veterans at more than three times the rate of the rest of the government, but even they experienced a small drop in disabled veteran new hiring from 1981 to 1986. (OPM does not collect USPS new hire data. Also, because of cost considerations, OPM provided 1981 and 1986 data only.) The DOL disabled veteran new hire rate was the same in 1981 and 1986, and the

hiring rates of the other four agencies declined, even though the governmentwide rate, excluding DOD and VA, rose. OMB and HHS were also below the 1981 governmentwide disabled veteran hiring rate, excluding DOD and VA, of 1.1 percent, while DOL, OPM, and NASA exceeded that rate. Further, in 1986 OMB, HHS, and NASA were below the 1.2 percent disabled veteran hiring rate for the government, excluding DOD and VA, while DOL and OPM exceeded that rate.

Table 2.6: Total New Hires Compared to Disabled Veteran New Hires (Fiscal Years 1981 and 1986)

Agency	Fiscal year	Total new hires	Disabled veteran new hires	Disabled veteran percent of total new hires
Governmentwide ^a	1981	391,072	11,441	2.9
	1986	353,685	9,962	2.8
DOD and VA	1981	232,452	9,655	4.2
	1986	198,890	8,160	4.1
Governmentwide excluding DOD and VA ³	1981	158,620	1,786	1.1
	1986	154,795	1,802	1.2
DOL	1981	1,381	24	1.7
	1986	1,642	28	1.7
HHS	1981	22,321	170	0.8
	1986	13,024	85	0.7
NASA	1981	2,709	32	1.2
	1986	1,884	9	0.5
OMB	1981	200	1	0.5
	1986	89	0	0.0
OPM	1981	1,004	27	2. 7
	1986	755	19	2.5

^aThe governmentwide figures do not include the U.S. Postal Service.

Officials at NASA, OPM, and HHS also said that disabled veterans were usually older than most other prospective job applicants and were less likely to accept entry-level and clerical jobs the agencies had available. While the BLS study showed that unemployed disabled veterans were usually at least in their late 30s, our analysis of 1986 new hire data showed that 50 percent of governmentwide new hires (excluding USPS) were in the lowest graded white- and blue-collar positions (GS-1 through GS-4 and WG-1 through WG-4), and 48 percent of disabled veteran new hires entered at those same grade levels. Sixteen percent of all new hires in white-collar jobs in 1986 were at the GS-5 through GS-8 levels. Similarly, 16 percent of all disabled veterans hired in white-collar jobs in 1986 were at the GS-5 through GS-8 levels.

In 1986, clerical positions accounted for 34 percent of the total governmentwide new hires and 23 percent of disabled veteran new hires. DOD

and VA accounted for 48 percent of the government's clerical new hires and 82 percent of disabled veteran clerical new hires. About 3.3 percent of DOD and VA's clerical new hires were disabled veterans. This compares to 2.3 percent at OPM, 0.7 percent at DOL, and 0.4 percent each at NASA and HHs. None of OMB's 32 clerical new hires in 1986 was a disabled veteran.

Special Hiring Authorities Rarely Used Outside of DOD and VA

Under the provisions of Executive Order 11521, incorporated by reference in section 2014 (b) of title 38, United States Code, a federal agency may use a veterans readjustment appointment (VRA) to hire a Vietnamera veteran without competition provided that the veteran agrees to participate in a program of education and training. The program does not apply to nondisabled Vietnam-era veterans who have completed more than 14 years of education. However, Vietnam-era veterans who are receiving disability compensation or were discharged because of service-connected disabilities are eligible for the program regardless of their level of education.

The BLS survey did not analyze the education levels of disabled veterans as a group, but it did show that veterans in general were less likely to hold college and postgraduate degrees than were nonveterans. Therefore, unless an agency uses the veterans readjustment appointing authority, disabled veterans may not be able to qualify for positions with advanced education requirements. During fiscal years 1983 through 1987, 15 percent of all disabled veteran new hires entered federal service through veterans readjustment appointments.

From the program's inception in 1970 through fiscal year 1987, 279,228 veterans readjustment appointments were made, and over 80 percent of the veterans continued in career federal jobs. Over 15 percent of all fiscal year 1983 to 1987 veterans readjustment appointments went to disabled veterans.

Section 3112 of title 5, United States Code, provides a special appointing authority limited to 30-percent or more disabled veterans. A disabled veteran who has a service-connected disability of 30 percent or more may be given a noncompetitive temporary appointment in a federal agency if the veteran meets the appropriate qualification standard. This appointment may lead to subsequent conversion to career employment. Such noncompetitive appointments accounted for 66 percent of all new hires of 30-percent or more disabled veterans during fiscal years 1983

through 1987 and over 27 percent of all disabled veteran new hires during this period.

Together, veterans readjustment appointments and noncompetitive appointments for 30-percent or more disabled veterans accounted for over 42 percent of new hires of disabled veterans governmentwide from 1983 through 1987. An agency-by-agency breakdown of the use of the special appointing authorities for fiscal years 1984, 1985, 1986, and 1987 revealed that DOD and VA made 92 percent of all veterans readjustment appointments that went to disabled veterans and 92 percent of all noncompetitive appointments made for 30-percent or more disabled veterans. The five agencies in our review were below the governmentwide percentage of disabled veteran new hires using these special hiring authorities, and only DOL and OPM exceeded the governmentwide average excluding DOD and VA. OMB did not use either special appointing authority during the period. (See tables III.2 and III.3.)

DOL and OPM Exceed Governmentwide Promotion Rate

In OPM's view, 38 U.S.C. 2014 encourages the advancement of disabled veterans but does not require that disabled veterans be given preference for promotion. While we agree that the law does not require that promotion preference be given, we did compare relative advancement rates for disabled veterans as indicators of how well the agencies did in this area.

We determined the percentages of disabled veterans promoted by DOL, HHS, NASA, OMB, and OPM and the overall percentage promoted by the federal government during fiscal years 1981 and 1986, with and without DOD and VA promotion data. USPS promotion data are not included since it was not available from OPM's CPDF. We computed relative promotion rates by dividing the percentages of disabled veteran promotions by the percentages of promotions given to other employees. As shown in table 2.7, DOL and OPM had the best performance among the five agencies in promoting disabled veterans. The relative disabled veteran promotion rates at DOL exceeded the governmentwide averages in both years and exceeded the DOD and VA averages in 1986. OPM exceeded the governmentwide and DOD and VA averages in 1986.

Chapter 2
Assessment of Agencies' DVAAP Performance

Table 2.7: Promotion Rates of Disabled Veterans and All Other Federal Employees

	Promotion rates						
Agency	Fiscal year	Federal employees who are not disabled veterans	Disabled veterans	Relative promotion rates			
Governmentwide ^b	1981	19.9%	16.3%	82 ₉			
	1986	19.1	15.8	83			
All agencies other than DOD and VA	1981	19.9	14.2	71			
	1986	20.1	15.2	76			
DOD and VA	1981	19.9	17.1	86			
	1986	18.4	16.0	87			
DOL	1981	15.7	13.0	83			
	1986	14.7	13.9	95			
HHS	1981	21.7	15.9	73			
	1986	12.9	8.1	63			
NASA	1981	19.5	10.8	55			
	1986	20.4	14.4	71			
ОМВ	1981	11.4	0c	0c			
	1986	23.3	0c	0c			
ОРМ	1981	26.9	15.5	58			
	1986	18.0	18.5	103			

^aThe percentage rate for promotions of disabled veterans compared to the promotion rate percentage for employees who were not disabled veterans

^bThe governmentwide figures do not include the U.S. Postal Service

cOMB had 12 disabled veteran employees in 1981 and two in 1986; none were promoted

OPM regulations require agencies' DVAAP plans and reports to be based on detailed analysis and assessment of the status of disabled veterans' employment and advancement. Despite declines in their disabled veteran employment, the five agencies' plans and reports were general and did not change much from year to year. None of the five agencies had based its plans and reports on the detailed analyses needed to assess their DVAAP status and to define and correct problems in the employment and/or advancement of disabled veterans. OPM officials said that they used on-site agency visits and their annual report to Congress to promote DVAAP and convey statistical information, but that they did not assess and report on individual agency progress in meeting DVAAP objectives because of the lack of performance criteria in the law.

Agency Plans and Reports Do Not Contain Comprehensive Analysis By December 1 of each year, agencies must certify to OPM that they have an up-to-date DVAAP plan. DVAAP regulations require agencies to assess the status of disabled veteran employment and advancement when preparing their plans. The regulations require each agency to analyze employment and advancement data to "identify problem areas and deficiencies in the employment and advancement of disabled veterans," and OPM instructions state that "analysis should indicate where the agency needs improvement, where it is doing well, and what, if any, trends are noted."

OPM instructions also provide these sample questions agencies should answer in developing their DVAAP plans:

"Do the grade levels and occupational distribution of disabled veterans indicate any difficulties in advancement within the agency? Are special noncompetitive hiring authorities for 30 percent or more disabled [veterans] and Vietnam era veterans being used effectively? What progress in the hiring and advancement of disabled veterans has been made?"

We reviewed a total of 23 dyaap plans and 19 accomplishment reports the five agencies have prepared since 1984. DOL, HHS, NASA, and OPM prepared dyaap plans for fiscal years 1984 through 1988 and accomplishment reports for fiscal years 1984 through 1987 at the time of our review. The Executive Office of the President, which has responsibility for preparing omb's plans and accomplishment reports, prepared a plan for fiscal years 1986, 1987, and 1988 and an accomplishment report for fiscal years 1985, 1986, and 1987. However, omb did not have plans for 1984 and 1985 and did not submit an accomplishment report to opm for 1984. Our review of the 23 plans and 19 reports showed the following:

- Sixteen of the 23 plans and all 19 accomplishment reports contained the elements required by OPM on agency policies, leadership responsibilities, employment status and advancement opportunities afforded to disabled veterans, descriptions of recruiting and advancement methods, and program monitoring procedures.
- Seven plans lacked descriptions of how the agencies would provide or improve internal advancement opportunities.
- None of the agencies' plans or reports showed analysis of workforce composition data in enough detail to answer all the sample questions suggested by OPM instructions or to identify trends, or their causes, that were advantageous or disadvantageous to disabled veterans' employment or advancement.
- While the plans and reports generally contained some statistical information, they did not contain comprehensive detailed analysis of performance indicators (such as those shown in chapter 2), or strategies for improving agency performance.
- Despite continuous losses in disabled veteran employment levels, HHS and NASA did not change their plans from fiscal year 1984 to 1986, and NASA'S 1987 plan did not change in 1988; DOL and OPM made a few minor changes during this period; and OMB, which did not submit plans for fiscal years 1984 and 1985, used its one-page plan for fiscal year 1986 again in 1987 and 1988.
- All of the five agencies' plans and reports contained statements of such a general nature, particularly about recruiting methods and advancement opportunities, that they had limited usefulness to us in evaluating the agencies' progress in meeting DVAAP objectives.

OPM Reviews and Reports Do Not Focus on Evaluation

In reviewing agencies' DVAAP plans and accomplishment reports, OPM's Office of Affirmative Recruitment and Employment checks that all required elements are included in the plans and reports. However, since 1984 the OPM reviews have not evaluated the usefulness of the plans in meeting DVAAP objectives. In addition, except when OPM worked with EEOC, we could find no evidence that OPM assessed agency progress in meeting DVAAP objectives during its on-site agency visits or in its annual report to Congress on DVAAP activities.

OPM Review of Plans Analyzed Content of Required Elements Until 1985

As a rule, OPM reviews about one-third of the plans and all of the accomplishment reports each year. However, for fiscal year 1986, OPM officials said that they reviewed all of the agencies' DVAAP plans. We reviewed available checklists OPM used to document its review of 13 DVAAP plans and 6 accomplishment reports the five agencies prepared. The checklists showed that

- OPM identified problems with five of the agency plans and one accomplishment report and
- most of the problems identified were with fiscal year 1984 plans and were related to the need for more information on various required elements.

Problems that OPM identified and communicated to the agencies were not always corrected. For example, OPM advised DOL to revise its fiscal year 1984 plan by expanding its description of the recruiting methods to be followed for disabled veterans. OPM also said that DOL should add target dates for each action item. These revisions were not made in DOL's fiscal year 1984 plan or in plans it prepared for fiscal years 1985 to 1988.

NASA'S 1987 and 1988 plans were part of a 5-year plan (1987 to 1991) that was integrated with NASA'S other affirmative action plans. OPM approved NASA'S 5-year plan format. NASA officials said that their plan'S format was designed to accommodate changes but, despite their deteriorating disabled veteran employment profile, we found little change in NASA'S plans from one year to the next. OMB'S plans for 1986, 1987, and 1988 were identical, and DOL and HHS have made few changes in their plans since 1984. OPM'S plans were more detailed than those of the other four agencies, identifying OPM officials responsible for each action item and stipulating time frames for action items.

We discussed our findings with the OPM officials responsible for reviewing agency DVAAP plans and reports. They said that since 1985, OPM's review has focused on determining whether an agency's plan and accomplishment report contain all of the required elements. (See app. IV.) If the plan and report contain the required elements, OPM notes on the appropriate checklist that the plan or report meets the legal and regulatory requirements. They said that before 1985, OPM evaluated the content of the individual plan elements and, if necessary, requested that agencies modify their plans and reports. OPM officials said that this practice was discontinued in 1985 because of the lack of performance criteria in the law.

Concerning the lack of corrective actions by agencies and OPM's responsibilities for implementing the law and regulations, OPM officials said that OPM does not believe it can require an agency to comply with regulatory requirements if an agency does not want to comply. While 38 U.S.C. 2014 does not provide sanctions to apply against agencies, OPM does possess monitoring and reporting powers, as well as control over delegated authority agreements, that it can use to encourage agency cooperation.

OPM On-Site Visits Not Used for Evaluation

Under the law, OPM is responsible for the review and evaluation of each agency's DVAAP activities. The regulations state that OPM, as it deems appropriate, will do on-site evaluations of program effectiveness both at agency headquarters and at field installations or operating components.

An official from the Office of Affirmative Recruiting and Employment said that opm made 36 on-site visits in fiscal year 1985, 27 on-site visits in fiscal year 1986, and 26 on-site visits in fiscal year 1987. He said that these visits were made at the agencies' Washington, D.C., headquarters level and covered veterans' issues, the Federal Equal Opportunity Recruitment Program, other affirmative action programs, and recruiting in general. The official also said that opm regional staff made additional visits to agency field units and that the fiscal year 1987 visits included the headquarters of the five agencies in our review. One stated objective of the visits was to help agencies improve their DVAAPs and other veterans' employment programs by sharing information and offering to help solve problems agency officials identified.

OPM gave us a summary of the five visits, which concluded that "The visits helped establish rapport and made agencies more aware of OPM's commitment to veterans employment. The priority of veterans employment was reaffirmed." OPM was able to provide copies of the 1987 trip reports for three of the agencies covered in our review. The trip reports were general in nature and did not indicate that the effectiveness of DVAAP was evaluated. An OPM official said that these visits were not compliance reviews and were not intended to evaluate program effectiveness. The visits were, however, an effort to identify problems OPM could help solve.

In addition to its DVAAP responsibilities, OPM, under the Civil Service Reform Act of 1978 (Public Law 95-454), is responsible for executing, administering, and enforcing civil service laws, rules, and regulations. OPM makes personnel management evaluations of federal installations to obtain information it needs to manage and oversee agency personnel

programs. An OPM official said that as part of these evaluations, OPM determines if the agency has a DVAAP plan and, if so, if the DVAAP coordinators' performance evaluations contain DVAAP coverage. According to the OPM official, these evaluations seldom disclose DVAAP problems. We judgmentally selected 17 personnel management evaluation reports for fiscal years 1985 and 1986 on the five agencies. None of the reports mentioned DVAAP.

Annual Reports to Congress Focus on Statistical Information

The law requires OPM to report to Congress annually on DVAAP activities. The implementing regulations require the OPM reports to cover program implementation and specifically assess agencies' progress toward meeting program objectives.

OPM prepared annual reports to Congress on veterans affairs covered by 38 U.S.C. 2014, which includes DVAAP. However, OPM did not use the report to discuss program compliance or to assess agencies' progress in maximizing employment and advancement opportunities for disabled veterans.

The four most recent (for fiscal years 1984, 1985, 1986, and 1987) reports described OPM's DVAAP activities and primarily presented statistical information, such as governmentwide and agency-by-agency figures on the employment of veterans, disabled veterans, and 30-percent or more disabled veterans, as well as hiring and other employment data on Veterans Readjustment Appointments and noncompetitive temporary appointments for 30-percent or more disabled veterans. The reports do not contain agency-by-agency new hire or promotion figures for disabled veterans or 30-percent or more disabled veterans.

In contrast, for fiscal years 1982 and 1983, OPM issued semi-annual reports to Congress that contained more detailed data and analysis of governmentwide trends. For example, the 1983 report said that

"At the regional level, OPM personnel accompanied EEOC regional personnel on visits to ascertain how affirmative action for disabled veterans was typically being implemented in the field. OPM found in these visits that although agencies were maintaining separate statistics on disabled veterans, they were not emphasizing affirmative action for disabled veterans. This was evidenced by, for example, the lack of specific guidance from agency headquarters; the lack of separate policy statements or program plans for disabled veterans as a class; little or no contact by personnel officers with veterans organizations in the region; few or no disabled veterans hires; no use of the special hiring authority for veterans who are 30 percent or

more disabled; and no emphasis on upward mobility or internal advancement for disabled veterans."

These reports also contained sections on disabled veteran promotions. The 1983 reports showed that about 3.8 percent of all promotions, excluding USPS and the Tennessee Valley Authority, went to disabled veterans, who constituted 4.6 percent of that workforce. The report also said that 30-percent or more disabled veterans received 0.8 percent of promotions while constituting 0.7 percent of the same workforce. The report observed that

"It appears that the policy of according special attention to promoting, as well as hiring 30 percent or more disabled veterans is working well. . . . OPM views the first half year of the DVAAP as a baseline period against which to measure future accomplishments. The key statistical indicators of promotions, accessions, and on-board representation of disabled veterans show considerable progress as well as indicating areas for further attention (such as in promotions). . . . OPM expects to see continued improvement in the 'bottom line' indicators, despite . . . a general slowdown in Federal hiring. . . . "

The 1983 reports were the last to give narrative analysis of disabled veteran promotion activities. Subsequent reports have included a table of overall data on promotions governmentwide, but no individual agency data. OPM's reports, when taken together, show that from fiscal years 1983 through 1987, disabled veterans occupied from 4.4 to 4.6 percent of the CPDF reporting agencies' workforce and received between 3.7 and 3.8 percent of those agencies' promotions. Despite the 1983 report's expectation of "continued improvement in the 'bottom line' indicators," subsequent reports did not analyze the causes for the persistent gap between disabled veterans' workforce percentage and their percentage of promotions either governmentwide or on an agency-byagency basis.

Conclusions

Although OPM reviews agencies' DVAAP plans and accomplishment reports and prepares reports to Congress, we believe OPM needs to do more to satisfy the evaluation requirement of the law and regulations. In particular, it needs to evaluate agency progress in meeting program objectives.

We believe that OPM could more effectively carry out its DVAAP responsibilities and Congress would be better informed of program results if OPM would

- establish governmentwide and agency-specific performance indicators for measuring DVAAP progress,
- use the indicators to assess the agencies' progress,
- work with agencies that are falling below their expected performance level to help them find ways to improve their performance, and
- use the annual report to Congress to highlight good and bad performances.

Our statistical analyses contained in chapter 2 demonstrate that indicators can be developed to help the agencies and OPM analyze DVAAP performance and identify trends in the accomplishment of DVAAP objectives.

Recommendations

We recommend that the Director of OPM require the Office of Affirmative Recruiting and Employment to improve its management of DVAAP by

- developing, with agency assistance, criteria for measuring agencies' disabled veteran employment and advancement performance;
- overseeing agencies' self-evaluation efforts by helping them do the indepth data analysis necessary to find the causes of problems and ways to improve performance;
- using its reviews of agencies' plans and accomplishment reports and its on-site reviews to evaluate agencies' progress in meeting DVAAP objectives; and
- citing individual agency's progress or lack of progress and program effectiveness in the annual report to Congress.

We recommend that the Secretary of Labor, the Secretary of HHS, the Administrator of NASA, the Director of OMB, and the Director of OPM

- work with OPM's Office of Affirmative Recruiting and Employment to develop the criteria needed for measuring their disabled veteran employment and advancement performance and
- use the criteria to do self-assessment to be used as the bases for their DVAAP plans and reports.

Agency Views

We discussed with officials of all five agencies our report findings and recommendations for (1) establishing agency-specific performance criteria using in-depth data analysis and (2) using OPM reviews and reports to assess agency progress. They all generally agreed with the facts as presented. DOL, NASA, and HHS officials agreed that the recommendations would help them implement their **DVAAP** programs, and OPM officials said

Chapter 3
OPM Needs to Improve Its Oversight of Agencies' DVAAP Activities

that we had identified areas of the governmentwide program that needed strengthening and that our recommendations deserved serious consideration.

However, while OMB officials said that they thought that our recommendations would help the governmentwide program, they doubted the potential benefit to OMB because of concerns that its workforce composition was uniquely unsuited for using the special appointing authorities. Specifically, they said that since OMB only has slightly over 500 employees who are almost exclusively Presidential Interns, professionals with advanced degrees, and highly skilled secretaries, there was little opportunity for effectively using the special appointing authorities or other recruiting techniques to employ disabled veterans. They agreed, however, to reexamine the positions occupied by disabled veterans in prior years to determine whether these positions were candidates for using the special appointing authorities.

Coordinators' Views on DVAAP Implementation

DVAAP coordinators in agency headquarters, regional offices, and other units of the agency are responsible for implementing DVAAP plans. As part of our review, we sent a questionnaire to all 61 DVAAP coordinators in the five agencies, which they all completed.¹ The questionnaire was designed to identify the duties and responsibilities of DVAAP coordinators and their perceptions about the program's effectiveness. The questionnaire responses showed that most DVAAP coordinators perceive the program as falling short of achieving its objectives.

DVAAP coordinators' negative perceptions centered on the following:

- Forty-seven DVAAP coordinators said that they spent less than 10 percent of their time on DVAAP.
- Almost half of the DVAAP coordinators said that they had received no training on the program, and some were unfamiliar with basic tools for improving program results.
- Forty-five DVAAP coordinators said that they were not evaluated on their DVAAP responsibilities in their annual performance appraisals.
- About 40 percent of DVAAP coordinators said that their units do not use the veterans representatives funded by DOL in the state employment offices to recruit disabled veterans, even though this source was cited by other questionnaire respondents as being the most useful recruiting source. (Agency officials concurred with the outreach potential of DOL's program, and OPM said that efforts were underway to encourage its use.)

Time Spent on DVAAP

In our questionnaire, we asked the coordinators approximately what percent of their office time, on an annual basis, they spent on DVAAP activities. As shown in figure 4.1, 47 of 60 respondents to this question (78 percent) spent less than 10 percent of their time on DVAAP.

We also asked the coordinators how long their duties had included DVAAP responsibility. As shown in figure 4.2, 39 of 61 respondents (64 percent) had responsibility for DVAAP for 2 or more years.

DVAAP Training

We asked a series of questions about the training the coordinators received on DVAAP. First, we asked if they had received any training on how to implement DVAAP. Then we asked how many hours of training

¹Some coordinators did not answer one or more of the questions contained in the questionnaire. The percentages contained in the assessments made in this report are based on the number of respondents to the particular issue or question involved.

Figure 4.1: Percent of Office Time Allocated to DVAAP-Related Activities

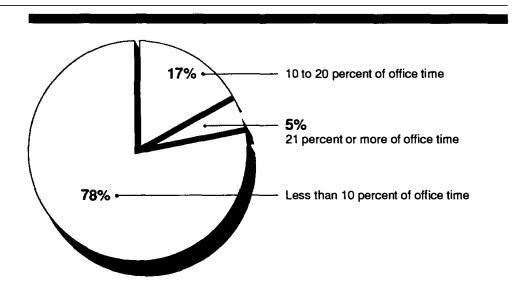
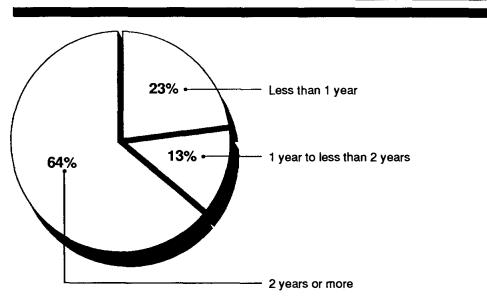


Figure 4.2: Length of Time Respondents Have Been DVAAP Coordinators



they had received. Table 4.1 shows on an agency-by-agency basis the number of coordinators who received DVAAP training and how much training they received. Overall, of 61 coordinators, 32 (52 percent) said that they had received training, while 29 (48 percent) said that they had received no training.

Table 4.1: Amount of Training DVAAP Coordinators Received

	OMB	ОРМ	NASA	HHS	DOL	Total
None	0	3	5	13	8	29
Less than 5 hours	1	1	0	2	4	8
5 to less than 10 hours	0	2	0	6	2	10
10 to less than 30 hours	0	1	1	1	2	5
30 to less than 50 hours	0	0	2	1	0	3
50 hours or more	0	2	1	0	1	4
Nonrespondents ^a	0	0	0	1	1	2
Total	1	9	9	24	18	61

^aThe two nonrespondents said that they had received training but did not say how much.

Duties and Responsibilities

Our questionnaire provided coordinators with a list of possible duties and/or responsibilities related to DVAAP. We asked them to check all the duties they or their staff did and to describe any other activities not contained in the list. Table 4.2 shows, in order of frequency of use, the types of DVAAP duties and responsibilities the coordinators said that they carried out. (Two of the 61 coordinators did not respond to this question due to recent organizational changes.)

Table 4.2: DVAAP Coordinators' Duties and Responsibilities in Order of Frequency of Use

Frequency Number		Duties and responsibilities
50	85	Refer job applications throughout the agency.
44	75	Coordinate with veterans and other groups to locate and recruit qualified disabled veterans for employment.
43	73	Review vacancy announcements to assure the inclusion of language encouraging disabled veterans to apply for positions.
41	69	Prepare statistical reports on the recruitment, retention, or advancement of disabled veterans in the agency or department.
38	64	Attend meetings outside the agency or department.
27	46	Ensure that disabled veterans receive career counseling.
25	42	Ensure the availability of sufficient information and funding for making reasonable job accommodations for disabled veterans.
22	37	Prepare reports for the attention of local management to keep them abreast of the progress or problems encountered by disabled veterans in their agency or department.
20	34	Prepare the official DVAAP plan for the agency, department, or subunit.
19	32	Review current position descriptions to identify and eliminate any barriers to the employment or advancement of disabled veterans.
17	29	Prepare a separate DVAAP plan to supplement the official DVAAP plan.
17	29	Develop career-entry or trainee positions to enhance the career opportunities available to disabled veterans.
11	19	Develop training programs for disabled veterans.

Eleven coordinators identified other duties they had, such as maintaining an applicant supply file, briefing people on DVAAP, and writing memoranda and articles to update program information.

All 61 coordinators said that they had work-related duties and responsibilities that did not involve DVAAP. We provided them with a list of possible non-DVAAP responsibilities, along with space to write in responsibilities not listed, and asked which ones, if any, were required of their position. Of the 61 DVAAP coordinators, 40 were responsible for other affirmative action programs, 28 had responsibility for stay-in-school programs, 21 had student co-op program responsibility, and 42 identified a variety of other responsibilities.

We also asked the coordinators to rank the amount of time devoted to DVAAP activities relative to other work activities. The activity receiving the most time was assigned the highest ranking. The activity receiving

the second highest amount of time was assigned the second highest ranking, etc. The resulting rankings assigned to the veterans activities were as follows:

- 1 coordinator indicated spending more time on DVAAP than any other work activity;
- 3 coordinators ranked DVAAP as their second highest work activity;
- 22 ranked DVAAP third or fourth in time spent;
- 18 ranked DVAAP among their fifth through eighth most time-consuming activities; and
- 17 coordinators did not report DVAAP to be among their top eight work-related time expenditures.

We also asked coordinators whether their annual performance appraisals specifically covered their DVAAP responsibilities. Of 59 coordinators who answered this question, 45 (76 percent) said that their appraisals did not include such an element. The Federal Personnel Manual states that the overall responsibility for DVAAP leadership should be reflected in the performance standards of the responsible agency official and that "other agency officials who share responsibility for the program should also be evaluated on their effectiveness in carrying it out as part of their periodic performance appraisal."

DVAAP Coordinators' Perceptions About Program Effectiveness

Our questionnaire asked for the DVAAP coordinators' views on program effectiveness. Sixty-six percent of the respondents believed that DVAAP achieved its objectives of promoting the employment and advancement of disabled veterans in the federal government to less than a moderate extent. Seventy-two percent of the respondents believed that DVAAP has had less than a moderate impact on their agencies' performance in providing employment opportunities for disabled veterans.

Our questionnaire also provided coordinators the opportunity to suggest ways to improve DVAAP effectiveness. Twelve of them suggested that special appointments to disabled veterans should not count against unit staffing allocations. They were apparently unaware that instruction 113-G of OMB's budgeting guidelines identifies veterans readjustment appointments as being among those that do not count against employment ceilings. In addition, nine coordinators cited low education levels as a "great" or "very great" barrier to hiring disabled veterans, indicating that they were unaware that veterans readjustment appointments were designed to compensate for shortfalls in education or that the 14-

year education limit for such appointments is waived for disabled veterans. These examples suggest that some DVAAP coordinators were unaware of the information available to assist in the employment of disabled veterans.

Locating Disabled Veterans to Hire

In recruiting disabled veterans, the DVAAP coordinators said that they most often worked with state employment offices, OPM area service centers, veterans groups, and associations for the handicapped. (See table 4.3.) They cited the veterans representatives at state and local employment offices as being the most useful recruiting sources. However, only 60 percent of the coordinators said that they used this source. Of the 35 coordinators who used veterans representatives, 28 (80 percent) said that they were useful to a moderate or greater extent.

Table 4.3: DVAAP Recruiting Sources Ranked by Frequency of Use and Perceived Usefulness by DVAAP Coordinators

			Degree of	usefulness ^b (Pe	ercent)
	Frequency	of use	Very useful	Moderately	Little or
Organizations	Number	Percent	to useful	useful	no use
State employment offices	48 of 59	81	33	35	29
OPM area service centers	42 of 57	74	45	29	19
Veterans groups (VFW, DAV, VET Center, etc.)	41 of 56	73	37	32	22
Nonveteran associations for the handicapped	41 of 59	69	29	39	27
Veterans representatives at state or local employment offices	35 of 58	60	54	26	17
Other federal agencies	33 of 58	57	33	30	30
College placement offices	30 of 57	53	23	43	33
Other educational institutions (technical)	24 of 57	42	38	17	38
Local VA Rehabilitation Centers	23 of 56	41	26	39	26
Other VA offices	20 of 55	36	25	30	30

^aWhere total respondents is less than 61, one or more did not indicate whether or not the source was used

During fiscal year 1987, DOL, under its Local Veteran Employment Representative and Disabled Veterans Outreach Specialists Programs (described on pp. 13 and 14), awarded about \$126 million in grants to

^bWhere total percentage figures do not equal 100 percent, one or more respondents did not indicate the degree of usefulness.

state employment agencies to fund approximately 3,500 program positions. Of this amount, \$69 million was for over 2,000 outreach specialists whose primary mission was to identify disabled veterans in need of employment assistance. Their duties included providing outreach through veterans' service organizations and community agencies, job referral and placement services, arranging for job counseling and testing, and promoting and developing job and training opportunities with employers. The VA furnished them with listings of Vietnam-era veterans with service-connected disabilities rated as compensable. It was then up to the specialists to help find jobs for these veterans.

OPM officials told us that veterans representatives were very effective in identifying disabled veterans who needed employment. They said that OPM encourages agencies to use veterans representatives whenever they attempt to fill a vacancy. They also said that efforts were underway between DOL and the states of California, Illinois, and Michigan to increase the use of outreach specialists and that these efforts would be discussed with DVAAP coordinators during future DVAAP conferences. The state employment service and DOL started this program, which created a centralized data base designed to match qualified disabled veterans with employment opportunities.

Conclusions

The five agencies frequently did not use coordinators to effectively manage their DVAAP programs. DVAAP coordinators reported spending less than 10 percent of their time on the program and almost half reported having no DVAAP training. Most coordinators believed that DVAAP achieves its objectives to a less than moderate extent and that the program has had less than a moderate impact on their agencies' performance in providing employment opportunities for disabled veterans.

Most DVAAP coordinators said that they were not evaluated on their DVAAP performance despite the Federal Personnel Manual guidance that agency officials responsible for DVAAP should be evaluated on their effectiveness in carrying it out. We believe that such evaluations are necessary to encourage coordinators to give attention to the program since most have other competing responsibilities. Other agency officials, as well as those in OPM, could use such evaluations to help them assess agency DVAAP performance.

In their outreach and recruiting efforts to locate qualified disabled veterans for employment, DVAAP coordinators reported contacting a variety of organizations and groups. The source cited as most useful was the

veterans representatives funded by DOL in the state employment offices. These representatives should be the most knowledgeable sources about the employment needs and availability of disabled veterans for employment. Over one-third of the coordinators did not report using the veterans representatives in state employment offices.

Recommendations

We recommend that the Secretary of Labor, the Secretary of HHS, the Administrator of NASA, the Director of OMB, and the Director of OPM

- Examine the manner in which DVAAP coordinators are used and trained, and take any actions necessary to assure that the coordinators are more effectively used to accomplish program objectives. In particular, the coordinators should be informed about the special hiring authorities that can be used to increase the employment of disabled veterans and the exclusion of veterans readjustment appointments from agency employment ceilings.
- Assure compliance with the OPM instruction that all agency officials who
 have DVAAP responsibilities be evaluated, as part of their performance
 appraisal, on their effectiveness in carrying out the program.
- Assure that their DVAAP coordinators establish and maintain contact
 with veterans representatives in state employment offices as a principal
 recruiting source of qualified disabled veterans.

Agency Views

We discussed with officials of all five agencies our findings and recommendations on the training and evaluation of their DVAAP coordinators and the use of special hiring authorities and veterans representatives in state employment offices as recruiting sources. They all generally agreed with the facts as presented and generally supported our recommendations.

OPM officials said that they had been encouraging agencies to use the veterans representatives as principal recruiting sources, and that they would take advantage of opportunities to reemphasize their use in the future. However, omb officials said that while they agreed in principal with our recommendations, they again expressed doubt, for the same reasons discussed in chapter 3, about their impact on omb's disabled veterans employment rate. Nevertheless, the omb officials agreed to further investigate the potential for using the special hiring authorities, as well as our other recommendations, to improve the results of their DVAAP program.

Explanation of CPDF Data Coverage

Data in this report were taken from the Office of Personnel Management's (OPM) Central Personnel Data File (CPDF) and •PM reports using CPDF data. The CPDF, an automated data file, is updated monthly by personnel action codes and covers approximately 94 percent of federal nonpostal civilian employees. Agencies not included in CPDF are: Congress, Library of Congress, most of the Judicial Branch, White House Office, Office of the Vice President, Central Intelligence Agency, National Security Agency, Postal Rate Commission, Board of Governors of the Federal Reserve, Federal Bureau of Investigation, the Defense Intelligence Agency, and the Tennessee Valley Authority. Also excluded are agricultural extension service employees, employees paid out of nonappropriated funds (e.g., employees of post exchanges in the Department of Defense), and noncitizen employees of the federal government in foreign countries.

Because the CPDF is a reporting system dealing with population statistics and is not an accounting system, data from the CPDF used in this report may not be totally accurate in every case.

Disabled Veterans Employed by Selected Agencies, Fiscal Years 1982 Through 1987

	Fiscal	Total _	Disable	d veterans	30-percent Disabled veterans		
Agency	year	employees	Number	Percent	Number	Percent	
Governmentwide ^a	1982	2,726,009	167,055	6.1	26,705	1.0	
	1983	2,712,482	168,923	6.2	31,661	1.2	
	1984	2,743,006	172,089	6.3	35,776	1.3	
	1985	2,830,910	175,620	6.2	40,263	1.4	
	1986	2,849,560	175,132	6.1	42,511	1.5	
	1987	2,910,716	175,675	6.0	44,614	1.5	
DOL	1982	19,562	951	4.9	186	1.0	
	1983	20,315	945	4.7	215	1.1	
	1984	17,467	822	4.7	210	1.2	
	1985	18,611	860	4.6	240	1.3	
	1986	17,625	779	4.4	235	1.3	
	1987	17,679	751	4.2	237	1.3	
HHS	1982	144,241	2,581	1.8	248	0.2	
	1983	143,254	2,454	1.7	311	0.2	
	1984	138,457	2,277	1.6	328	0.2	
	1985	136,523	2,085	1.5	332	0.2	
	1986	131,057	1,934	1.5_	343	0.3	
	1987	126,268	1,773	1,4	337	0.3	
NASA	1982	22,700	563	2.5	108_	0.5	
	1983	22,860	532	2.3	107	0.5	
	1984	22,287	465	2.1	88	0.4	
	1985	22,741	439	1.9	79	0.3	
	1986	22,475	395	1.8	71	0.3	
	1987	23,223	377	1.6	70	0.3	
OMB	1982	608	10	1.6	0	0.0	
	1983	613	8	1.3	0	0.0	
	1984	601	4	0.7	1	0.2	
	1985	568	3	0.5	1	0.2	
	1986	546	2	0.4	1	0.2	
	1987	571	1	0.2	0	0.0	
OPM	1982	7,429	223	3.0	34	0.5	
	1983	6,696	194	2.9	42	0.6	
	1984	6,922	196	28	51	0.7	
	1985	6,629	194	2.9	57	0.0	
	1986	6,155	178	2.9	50	0.8	
	1987	6,325	170	2.7	43	0.7	

^aThese figures include the Postal Service and all departments and agencies of the Executive Branch except the Central Intelligence Agency, National Security Agency, and the Defense Intelligence Agency.

Table III.1: Total New Hires Compared to Disabled Veteran New Hires for Fiscal Years 1976, 1981, and 1986

			Disabled	Dischlad voterer
Agency	Fiscal year	Total new hires	Disabled veteran new hires	Disabled veteran percent of total new hires
Governmentwide	1976	392,845	7,396	1.9
	1981	391,072	11,441	2.9
	1986	353,685	9,947	2.8
DOL	1976	3,777	63	1.7
	1981	1,381	24	1.7
	1986	1,642	28	1.7
HHS	1976	21,799	205	0.9
	1981	22,321	170	0.8
	1986	13,024	85	0.7
NASA	1976	2,838	13	0.5
	1981	2,709	32	1.2
	1986	1,884	9	0.5
OMB	1976	137	1	0.7
	1981	200	1	0.5
	1986	88	0	0.0
OPM	1976	1,595	31	1.9
	1981	1,004	27	2.7
	1986	755	19	2.5

Table III.2: Veterans Readjustment Appointments at Selected Agencies for Fiscal Years 1984 Through 1987

		FY 1984	
	New hires	VRA new hires	VRA percent of agencies' new hires
Governmentwide	396,704	20,704	5.2
DOD	185,397	13,331	7.2
VA	56,401	5,804	10.3
Governmentwide excluding DOD and VA	154,906	1,569	1.0
HHS	19,104	57	0.3
DOL	1,946	10	0.5
NASA	2,053	17	0.8
ОМВ	143	0	0.0
ОРМ	974	12	1.2

FY 1985				FY 1986		FY 1987			
New hires	VRA new hires	VRA percent of agencies' new hires	New hires	VRA new hires	VRA percent of agencies' new hires	New hires	VRA new hires	VRA percent of agencies' new hires	
425,771	17,477	4.1	353,685	14,032	4.0	412,421	12,912	3.1	
205,718	11,593	5.6	142,403	9,116	6.4	174,153	8,118	4.7	
63,122	4,593	7.3	56,487	3,785	6.7	69,831	3,474	5.0	
156,931	1,291	0.8	154,795	1,131	0.7	168,437	1,320	0.8	
19,104	43	0.2	13,024	25	0.2	14,058	36	0.3	
2,561	18	0.7	1,642	6	0.4	2,606	22	0.8	
3,086	36	1.2	1,884	14	0.7	2,643	12	0.5	
126	0	0.0	89	0	0.0	124	0	0.0	
1,094	8	0.7	755	8	1.1	1,258	12	1.0	

Table III.3: Disabled Veteran New Hires Who Entered Federal Service by VRA and Noncompetitive Appointments for 30-Percent or More Disabled Veterans

		FY 1					
	VRA ap		Noncom appts. fo		VRA appts. of disabled veterans		
	Number	Percent of new hires	Number	Percent of new hires	Number	Percent of new hires	
Governmentwide	2,049	0.52	3,157	0.80	1,695	0.40	
DOD	1,278	0.69	2,191	1.18	1,151	0.56	
VA	622	1.10	700	1.24	433	0.69	
Governmentwide excluding DOD and VA	149	0.10	266	0.17	111	0.07	
HHS	6	0.03	15	0.08	3	0.02	
DOL	7	0.36	9	0.46	9	0.35	
NASA	2	0.10	1	0.05	2	0.06	
OMB	0	0.00		0.00	0	0.00	
OPM	6	0.62	1	0.10	0	0.00	

FY 1985			FY 1	986		FY 1987				Use of s hiring au for dis	thorities
Noncom appts. fo		VRA ap	pts. of veterans	Noncom appts. fo					veterans	veterans FY 1984 to 1987	
Number	Percent of new hires	Number	Percent of new hires	Number	Percent of new hires	Number	Percent of new hires	Number	Percent of new hires	Number	Percent of new hires
3,622	0.85	1,515	0.43	2,714	0. 7 7	1,524	0.37	3,325	0.81	19,601	1.23
2,457	1.19	973	0.68	1,757	1.23	1,033	0.59	2,122	1.22	12,962	1.83
937	1.48	403	0.71	728	1.29	332	0.48	953	1.36	5,108	2.08
228	0.15	139	0.09	229	0.15	159	0.09	250	0.15	1,531	0.24
12	0.06	4	0.03	15	0.12	3	0.02	9	0.06	67	0.10
11	0.43	1	0.06	7	0.43	11	0.42	8	0.31	63	0.72
0	0.00	3	0.16	2	0. 11	1	0.04	2	0.08	13	0.13
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
2	0.18	4	0.53	2	0.26	3	0.24	6	0.48	24	0.59

Requirements for DVAAP Plans and Accomplishment Reports

OPM's Federal Personnel Manual (ch. 720, sub.3), dated February 14, 1983, contains instructions for agencies implementing DVAAP. This guidance relates to the regulations in 5 C.F.R. 720, which OPM issued in accordance with section 403 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 2014).

OPM requires each executive agency to develop an annual plan to promote government employment and job advancement opportunities for qualified disabled veterans. According to OPM's instructions, the plans must be submitted to OPM upon request and contain

- a statement of the agency's policy with regard to the employment and advancement of disabled veterans, especially those who are 30-percent or more disabled:
- the name and title of the official assigned overall program leadership for the plan;
- an assessment of the current status of disabled veteran employment, with emphasis on those veterans who are 30- percent or more disabled;
- a description of recruiting methods that will be used to seek out disabled veteran applicants, including measures to be taken to recruit veterans who are 30-percent or more disabled;
- a description of how the agency will provide or improve internal advancement opportunities for disabled veterans;
- a description of how the agency will inform its components, including field installations, on a regular basis, of their responsibilities for employing and advancing disabled veterans; and
- a description of how the agency will monitor, review, and evaluate its planned efforts, including implementation at agency components during the period covered by the plan.

By December 1 of every year, each agency is also required to submit to OPM an accomplishment report on the plan for the previous fiscal year. According to OPM's instructions, these reports must contain

- methods used to recruit and employ disabled veterans, especially those who are 30-percent or more disabled;
- methods used to provide or improve advancement opportunities for disabled veterans within the agency;
- a description of how the activities of major components, including field installations, were monitored, reviewed, and evaluated; and
- an explanation of the agency's progress in implementing its DVAAP plan during the fiscal year.

Appendix IV Requirements for DVAAP Plans and Accomplishment Reports

In addition, OPM's instructions specify that each agency must certify to OPM, by December 1 of each year, that it has an up-to-date plan. This certification may be submitted as part of the agency's annual accomplishment report.

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