

**GAO**

Report to the Congress

June 1989

**STATE  
DEPARTMENT**

**Minorities and Women  
Are Underrepresented  
in the Foreign Service**



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

Comptroller General  
of the United States

B-232884

June 26, 1989

To the President of the Senate and the  
Speaker of the House of Representatives

This report addresses the State Department's personnel practices and affirmative action efforts relative to their impact on minorities and women in the Foreign Service. We made our review in response to a provision of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989 (Public Law 100-204, sec. 174).

We are sending copies of this report to the Secretary of State, the Director of the Office of Management and Budget, and the Chairman of the Equal Employment Opportunity Commission.

*for* 

Charles A. Bowsler  
Comptroller General  
of the United States

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# Executive Summary

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## Purpose

The Foreign Relations Authorization Act, Fiscal Years 1988 and 1989, directed GAO to review the Foreign Service merit personnel system. Specifically, GAO was directed to examine recruitment, appointment, assignment, and promotion practices regarding their impact on minorities and women.

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## Background

The Foreign Service was established in 1924 to help plan and implement U.S. foreign policy and to represent U.S. interests in foreign countries and international organizations. Although several federal agencies employ Foreign Service personnel, the State Department employs the largest number by far. State has (1) about 5,100 Foreign Service officers, who are traditionally considered to be diplomats, and (2) about 4,200 Foreign Service specialists, such as medical doctors, secretaries, and security personnel. State also employs over 4,700 Civil Service personnel, who were not included in GAO's review.

The Civil Rights Act of 1964 requires federal agencies to develop and implement affirmative action programs to eliminate the historic underrepresentation of minorities and women in the work force. The Foreign Service Act of 1980 calls for the composition of the Foreign Service to be representative of the American people.

The Equal Employment Opportunity Commission (EEOC) is responsible for providing agencies with guidance on their affirmative action programs. EEOC has developed labor force data for federal agencies to use in analyzing the representation of minorities and women in their work force. Currently this labor force data is based on the 1980 census. EEOC requires agencies to analyze their personnel practices to identify and eliminate any policies, practices, and procedures that may be barriers to the employment or advancement of minorities and women.

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## Results in Brief

Minorities and women are underrepresented in the State Department's Foreign Service work force when matched against comparable civilian labor force representation, issued by EEOC as criteria for determining whether minorities and women are adequately represented in an agency's work force. Between 1981 and 1987 State increased the representation of minorities from 7 percent to 11 percent. The representation of white women remained essentially unchanged at about 24 percent. Minorities and women are still significantly underrepresented at the senior levels of the Foreign Service.

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The State Department has not had an effective affirmative action plan or program for overcoming the underrepresentation in the Foreign Service. Specific goals and timetables for the hiring and advancement of minorities and women have not been established, as required by EEOC guidelines. In addition, State has not adequately reviewed some aspects of its personnel processes for possible barriers to the hiring of minorities and the advancement of minorities and white women.

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## Principal Findings

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### Minorities and White Women Are Underrepresented

The statistics on minorities and white women in the Foreign Service show that the State Department does not meet the criteria for representation as established by EEOC from comparable civilian labor force statistics. EEOC's measure of representation is based on the 1980 census and is further differentiated by type of job (professional, administrative, technical, or clerical). If the increases of minorities and women in comparable jobs since the 1980 census were considered, the statistics would show an even greater underrepresentation of minorities and women.

State increased the overall representation of minorities and women in the Foreign Service from 30 percent in 1981 to 35 percent in 1987. During this period the Foreign Service grew by over 900 employees, of which about 475 were minorities and 225 were white women. Although State increased the number of white women in the Foreign Service between 1981 and 1987, white women did not increase as a percentage of Foreign Service personnel, and they are still underrepresented.

By applying the EEOC criteria, GAO found that State has eliminated entry level underrepresentation for Foreign Service officers. However, underrepresentation at the mid- and senior levels of the Foreign Service exists, particularly for white and minority women. Foreign Service specialists have not fared as well as Foreign Service officers. Women (both minority and white) made little progress in either administrative or technical positions. Black and Hispanic women are underrepresented in Foreign Service clerical positions.

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**Affirmative Action Plans  
Do Not Meet EEOC  
Requirements**

The State Department has not fully complied with EEOC requirements for federal affirmative action programs. The EEOC requirements are designed to eliminate underrepresentation in the federal work force. EEOC has repeatedly criticized State's affirmative action plans, yet subsequent plans have also been deficient.

Although State has established broad affirmative action goals, it has not, according to EEOC, (1) properly analyzed its work force to establish affirmative action hiring goals targeted to specific underrepresented groups, (2) established goals or timetables for the internal movement or promotion of personnel to eliminate underrepresentation at mid- and senior levels of the Foreign Service, and (3) conducted analyses of possible impediments to equal employment opportunity. State's affirmative action efforts have not focused on its Foreign Service specialist personnel. State has not collected or analyzed information on applicants for Foreign Service specialist positions to determine whether its hiring processes meet merit requirements established by EEOC.

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**Possible Barriers Not  
Being Addressed**

State Department data on the results of certain personnel procedures and practices indicate that there may be barriers that hinder the hiring or advancement of minorities and white women in the Foreign Service. For example:

- About 20 percent of white applicants passed the written Foreign Service examination, while 5 percent of minorities passed. To compensate for disparities in the examination pass rates, State instituted a "near-pass" program; as a result 28 percent of all minorities who took the examination in 1987 moved beyond this initial screening step to the oral examination. However, minorities are less successful than whites in the oral examination.
- A final review panel, which analyzes the files of candidates who succeed in the written and oral examinations (oral only for specialists), assigns a suitability score to candidates based on the examination scores and a background investigation. GAO found that in 1987 minority Foreign Service officer candidates were rejected by the final review panel at higher rates than white candidates.
- Minorities and white women are disproportionately assigned to administrative and consular work. White males receive a greater percentage of political assignments, which are viewed as being more favorable in seeking advancement to Senior Foreign Service positions. These perceptions about advancement, however, are not entirely accurate. Consular

officers are promoted at the highest rate at the mid-levels and to the Senior Foreign Service at almost the same rate as political officers.

Although State's affirmative action plans refer to barrier analyses, the EEOC has criticized the analyses because they do not identify the specific groups excluded by the barrier or the occupations from which they are excluded.

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## Recommendations

Although not specifically required by current EEOC directives, GAO recommends that to address the problem of underrepresentation in the Foreign Service, the Secretary of State establish numerical goals for hiring and advancement by race, ethnic origin, and gender. GAO also recommends that the Secretary of State

- compile information needed, such as the race, ethnic origin, and gender of applicants for Foreign Service specialist positions, to monitor the implementation and progress of affirmative action efforts and
- analyze personnel processes for artificial barriers and eliminate any barriers found. Such analyses should include determinations of

(1) whether the Foreign Service written examination is a valid predictor of success in light of current job requirements,

(2) why minorities and women are eliminated at a higher rate than white men by the final review panel process, and

(3) why women and minorities are disparately assigned to certain functional work areas.

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## Agency Comments

In its March 1989 comments on GAO's report, the State Department indicated that corrective actions would be, or already had been, initiated. The Department stated that it will

- take steps to alter its 5-year affirmative action plan, as needed, including the establishment of specific goals to eliminate underrepresentation;
- compile more extensive information on the race and gender of applicants for specialist positions to monitor affirmative action progress; and
- undertake a new job analysis that will underpin a redesigned written examination in an attempt to eliminate any disparate impact.

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The EEOC generally agreed with GAO's report and stated that GAO's findings were consistent with its analyses of State's affirmative action plans.



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**Abbreviations**

CLF	Civilian Labor Force
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
FS	Foreign Service
FSO	Foreign Service officer
GAO	General Accounting Office
OPM	Office of Personnel Management
PATCO	Professional, Administrative, Technical, Clerical, and Other
SFS	Senior Foreign Service

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# Introduction

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The Foreign Relations Authorization Act, Fiscal Years 1988 and 1989 (Public Law 100-204, sec. 174), enacted on December 22, 1987, called for us to review the Foreign Service (FS) merit personnel system. The law indicated that we should pay particular attention to reports of racial, ethnic, sexual, and other discriminatory practices in the recruitment, appointment, assignment, and promotion of FS employees. This report responds to that legislative mandate.

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## The Foreign Service

The Foreign Service was established in 1924 to provide a cadre of personnel to help formulate and implement U.S. foreign policy and to represent U.S. interests in foreign countries and international organizations. The Foreign Service Act of 1980 (Public Law 96-465) provides the framework for the current FS personnel system and states that the Foreign Service should be representative of the American people and operated on the basis of merit principles. The State Department concluded that it is essential that the Department represent the principles, ideals, freedoms, and diversity for which this country stands, and it is therefore of fundamental importance that the Foreign Service truly represent the cultural and ethnic diversity of our society.

The Department of State employs the majority of the FS personnel. FS personnel at State are divided into two broad categories: officers and specialists. State employs over 5,100 officers and 4,200 specialists. Officers are assigned to four broad functional work areas—administrative, consular, economic, and political affairs—and must go through an examination process before being hired. Specialists include secretaries, doctors, security personnel, personnel officers, and others.

The FS personnel system is essentially a bottom entry, merit promotion, up or out system. In contrast with State's 4,700 Civil Service employees, FS employees have rank in person rather than rank in position. They can be assigned to jobs either above or below their personal ranks. In addition, FS personnel are promoted based on individual capability and potential rather than promoted into a specific position.

The appointment of FS officers and specialists is a lengthy, multi-step process. Key steps include the following:

- a written examination (officers only),
- an all-day oral assessment (different assessments for officers and specialists),
- a suitability review and security clearance background investigation,

- a medical examination and clearance,
- a 1,000-word autobiography (officers only),
- a final review panel, and
- placement on a hiring register.

These steps may take up to 19 months from the date of the FS written examination.

Those hired are given 4-year probationary appointments. Within that time they must receive career appointments, which are offered based on reviews by Commissioning and Tenure Boards. Employees who do not receive career appointments are “selected out”—separated from the Foreign Service.

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## Affirmative Action Requirements

In 1972, the Congress amended the Civil Rights Act of 1964 to require federal agencies to develop and implement affirmative action programs to ensure implementation of equal employment opportunity (EEO) policies. These affirmative action programs are intended to overcome the lingering effects of historical discrimination evidenced by the underrepresentation of minorities and women in specific agencies, regions, positions, and grade levels. The Equal Employment Opportunity Commission (EEOC) is responsible for providing affirmative action guidance, monitoring the hiring and promotion of minorities and women, and overseeing the government-wide discrimination complaint process.

The Secretary of State is responsible for affirmative action and related EEO activities within the Department of State. State has established its Office of Equal Employment Opportunity and Civil Rights to help carry out those responsibilities. Personnel policies and administration are the responsibilities of the Director General of the Foreign Service and Director of Personnel.

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## Objectives, Scope, and Methodology

The Foreign Relations Authorization Act, Fiscal Years 1988 and 1989 (Public Law 100-204), directed GAO to review the Foreign Service merit personnel system. Specifically, we examined State’s personnel practices to determine whether minorities and white women in State’s FS corps were (1) underrepresented, and/or (2) receiving disparate treatment in such areas as hiring, assignments, and promotions. We evaluated State’s efforts to comply with federal regulations concerning affirmative action programs but did not determine whether discrimination existed in

State's FS merit personnel system. We did not include State's Civil Service personnel in our study.

At our request, State officials developed a wide array of computer-generated information on State's work force and composition. We did not validate this data, which was drawn from the State Department's automated personnel system. We interviewed State Department officials and obtained various agency documents and reports on State's hiring, promotions, and other personnel processes.

We analyzed State Department data on the nature and extent of minority (black, Hispanic, Asian-American/Pacific Islander, and American Indian/Alaskan Native) and white female representation at various levels in the State Department's FS work force. We compared this information with appropriate civilian labor force data supplied by EEOC to identify areas in which minorities and white women were underrepresented in the Foreign Service.

Due to the nature of EEOC's requirements for measuring work force representation and the impact of personnel decisions, our analyses focused on the rate (percentage) of minority and female representation. In categories with low work force representation rates, such as American Indian/Alaskan Natives, the differences of one additional employee or one additional promotion can substantially increase or decrease the representation rates.

EEOC's Management Directives 707 and 707A provided the applicable federal guidance on affirmative action planning during the period covered by our review. We compared State's affirmative action plans and updates with this EEOC guidance. We used Office of Personnel Management (OPM) guidance to evaluate State's recruiting program. We also contacted EEOC officials to discuss and obtain insight into affirmative action requirements and State's affirmative action plans.

Our work was performed between January and November 1988 in accordance with generally accepted government auditing standards.

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# Progress Is Achieved, but Minorities and White Women Remain Underrepresented in the Foreign Service

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The State Department increased minority representation in the Foreign Service from 7 percent in 1981 to 11 percent in 1987. The percentage of white women has remained essentially unchanged at about 24 percent. In 1987 minorities and white women were still substantially underrepresented when compared with civilian labor force data that the EEOC has issued to measure federal agencies.

Progress has been mixed in the FS officer and specialist categories. At the entry level, underrepresentation in the FS officer corps has been eliminated, except for Asian-Americans/Pacific Islanders. In mid-level ranks of the officer corps, minority male representation has increased, but minority and white women have made less progress. In State's Senior Foreign Service positions, underrepresentation of minorities and white women is still pervasive. In State's FS specialist positions, the representation of minority males has improved since 1981. However, white and minority women remain underrepresented in many specialist job categories, even at the entry level.

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## Changes in the Composition of State's Work Force

Between 1981 and 1987, the Foreign Service in State grew from about 8,500 employees to about 9,400 employees. Of this increase minorities and white women represented almost 700 employees. Table 2.1 shows changes in the composition of State's FS employees between 1981 and 1987.

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**Table 2.1: Change in the Composition of  
State's Foreign Service Employees  
Between 1981 and 1987**

Representation category	Employees (Percent)		Change
	1981	1987	
<b>White</b>			
Male	69.59	65.32	(4.27)
Female	23.49	23.65	0.16
<b>Black</b>			
Male	2.79	3.33	0.54
Female	1.49	2.06	0.57
<b>Hispanic</b>			
Male	1.45	2.55	1.10
Female	0.36	0.88	0.52
<b>Asian-American/Pacific Islander</b>			
Male	0.48	1.03	0.55
Female	0.26	0.66	0.40
<b>American Indian/Alaskan Native</b>			
Male	0.06	0.30	0.24
Female	0.02	0.15	0.13

As can be seen, some progress was made in each minority category. However, white women, who comprise over 34 percent of the total available civilian labor force, make up only 24 percent of all FS employees. White women accounted for about one quarter of the growth in the Foreign Service from 1981 to 1987. As a result, white women increased their representation by 0.16 percent—thus in essence maintaining status quo. The only other group to experience such a small percentage change was American Indian/Alaskan Native women with a 0.13 percent increase. Their numbers increased from 2 employees in 1981 to 14 in 1987.

**Composition of State's  
Work Force as of  
September 1987**

As a frame of reference, 6,166 of State's 9,439 FS employees were white men. State has 2,232 white women among its FS employees. As of September 1987, 508 black men and women, 324 Hispanics, 42 American Indians or Alaskan natives, and 159 Asian-Americans or Pacific islanders were in State's Foreign Service. State's personnel records did not indicate the race, gender, or ethnic origin of eight other employees.

State's records show that white men held 600 of the 655 Senior FS officer positions and 43 of the 55 Senior FS specialist positions. By comparison, black men held 12 Senior FS officer positions and none of the senior specialist positions.

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Table 2.2 shows the 1987 composition of State's Foreign Service by race, gender, and ethnic origin for the grade levels within the ranks of FS officers and specialists.

**Table 2.2: Composition of State's Foreign Service (As of Sept. 1987)**

Occupation category	Grade	Total <sup>a</sup>	Male					Female				
			White	Black	Hispanic	Indian/ Alaskan	Asian/ Pacific Islander	White	Black	Hispanic	Indian/ Alaskan	Asian/ Pacific Islander
<b>FS Officers</b> (5,163 employees)	SFS <sup>b</sup>	655	600	12	8	0	3	31	1	0	0	0
	01	837	691	21	15	2	4	94	6	1	1	1
	02-03	2032	1354	105	90	7	25	366	52	17	0	16
	04-06	1639	977	43	46	5	38	447	46	19	2	14
<b>FS Specialists</b> Professional (137 employees)	SFS	29	26	1	0	0	0	0	2	0	0	0
	01	32	30	0	0	0	0	2	0	0	0	0
	02-03	45	20	0	2	0	2	19	0	0	0	2
	04-06	31	11	1	0	0	3	15	0	1	0	0
Administrative (2,610 employees)	SFS	18	17	0	1	0	0	0	0	0	0	0
	01	142	125	4	2	0	0	10	0	0	0	0
	02-03	545	447	21	6	4	3	54	6	2	0	1
	04-06	1299	1054	50	39	6	11	118	14	4	1	1
	07-09	606	467	35	23	1	5	63	6	3	0	3
Technical (384 employees)	SFS	1	0	0	0	1	0	0	0	0	0	0
	01	11	11	0	0	0	0	0	0	0	0	0
	02-03	112	100	8	0	0	0	3	1	0	0	0
	04-06	238	207	8	8	2	3	6	3	1	0	0
	07-09	22	17	2	0	0	0	1	1	0	1	0
Clerical (1,138 employees)	02-03	7	0	0	0	0	0	6	0	0	0	1
	04-06	552	2	1	0	0	0	499	20	15	3	11
	07-09	579	6	2	1	0	0	495	36	20	6	12

<sup>a</sup>The total does not always equal the sum of each category because some personnel records do not indicate the employees' race, gender, or ethnic origin.

<sup>b</sup>Senior Foreign Service.

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## Extent of Underrepresentation of Minorities and Women

According to EEOC guidance, civilian labor force data based on the 1980 census is to be used by federal agencies in analyzing their work force representation. If the percentage of minorities or women in an agency's work force is lower than the percentage available in the civilian labor force, that group is considered underrepresented.<sup>1</sup> The EEOC data makes distinctions in the availability of individuals with different job skills.

Some progress has been made in eliminating underrepresentation, particularly in the FS officer corps. For example, underrepresentation has been eliminated at the entry level except for Asian-Americans/Pacific Islanders; black and American Indian/Alaskan Native males have progressed except at the Senior Foreign Service level. However, underrepresentation of white and minority women has not been eliminated except at the entry levels.

Less progress has been made in eliminating underrepresentation in the specialist ranks.

- There was no improvement for white and minority women in the administrative ranks, but representation of black, Hispanic, and American Indian/Alaskan Native males showed some improvement.
- In the technical ranks there was no improvement for white and minority women, but representation of minority males showed some improvements at the lower grade levels.
- In the clerical ranks, representation of Asian-American/Pacific Islander and American Indian/Alaskan Native women improved. There was little or no improvement in representation of black and Hispanic women or for all minority male categories.

There are so few professional FS specialists—137 employees in 1987—that any computation of full representation leads to a need for less than one staff member in many of the race, ethnic origin, and gender groups. The addition of one staff member would result in full representation for these categories.

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<sup>1</sup>According to EEOC guidance, underrepresentation exists if a specific minority group's rate of employment in a federal agency's work force is less than the group's rate of availability in the civilian labor force, i.e., all employees and persons seeking employment. EEOC's white-collar civilian labor force data have been differentiated into five categories to match the federal job categories—professional, administrative, technical, clerical, and other (PATCO). In this report, all but "other" labor force data are used in our analyses. EEOC's current affirmative action guidelines no longer use the term underrepresentation but instead changed to new terms—conspicuous absence and manifest imbalance.

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The extent of underrepresentation, as defined by EEOC criteria, of minorities and women among State's FS officers and specialists is shown in table 2.3.

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**Table 2.3: Underrepresentation of Minorities and White Women in State's Foreign Service by Grade (As of Sept. 1987)**

Occupation category	Grade	Male				Female				
		Black	Hispanic	Indian/ Alaskan	Asian/ Pacific Islander	White	Black	Hispanic	Indian/ Alaskan	Asian/ Pacific Islander
<b>FS Officers</b> (5,163 employees)	SFS	3	6	1	14	145	17	7	a	7
	01	0	3	0	17	131	17	9	a	8
	02-03	0	0	0	26	180	5	6	3	7
	04-06	0	0	0	3	0	0	0	a	4
<b>FS Specialists</b> Professional (137 employees)	SFS	0	a	a	a	8	0	a	a	a
	01	a	a	a	a	7	a	a	a	a
	02-03	1	0	a	0	0	1	a	a	0
	04-06	0	a	a	0	0	a	0	a	a
Administrative (2,610 employees)	SFS	a	0	a	a	5	a	a	a	a
	01	1	2	a	2	28	4	2	a	a
	02-03	0	9	0	3	91	11	5	a	2
	04-06	0	0	0	3	227	27	13	1	6
	07-09	0	0	a	2	98	13	5	1	a
Technical (384 employees)	SFS	a	a	0	a	a	a	a	a	a
	01	a	a	a	a	4	a	a	a	a
	02-03	0	3	a	1	38	6	3	a	1
	04-06	a	0	0	0	82	12	5	a	2
	07-09	0	a	a	a	7	a	a	0	a
Clerical (1,138 employees)	02-03	a	a	a	a	0	a	a	a	0
	04-06	14	10	a	4	0	31	8	0	0
	07-09	14	10	a	4	0	18	5	0	0

Note: The numbers on this table represent the staff shortfall when compared with full representation using EEOC criteria and 1980 census data.

<sup>a</sup>Less than one person required for full representation.

For the 177 separate groupings (by grade, race, ethnic origin, and gender) shown in table 2.3, we also compared the extent of underrepresentation in 1987 with that in 1981. Our analysis showed the elimination of underrepresentation in 24 groupings (13.6 percent) and increases in representation in 56 groupings (31.6 percent).

The greatest progress was achieved for FS officers: of 36 groupings, 18 showed increased representation (50 percent) and underrepresentation was eliminated in 9 groupings (25 percent). The least improvement was achieved for technical specialists with representation increases in only 3 of 36 groupings (8.3 percent) and underrepresentation eliminated in only 5 groups (13.9 percent).

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## Other Work Force Measures

According to EEOC's criteria for measuring work force representation, minorities and women represent a far greater percentage of the civilian labor force than their representation in certain PATCO categories. For example, minority men comprise 10.06 percent of the civilian labor force but only 7.32 percent of the professional labor force. White women are 34.08 percent of the civilian labor force as compared with 26.85 percent of the professional labor force. While we used the measures prescribed by EEOC, the head of State's affirmative action office pointed out that if the FS composition is compared with the population of the United States as a whole, regardless of the availability of minorities and women with the requisite work skills, State would be further from the goal of being representative of the American people than when using the EEOC criteria.

The criteria established by EEOC is based on 1980 census data, but considerable change has occurred in the civilian labor force since 1980. If these changes were considered in analyzing State's representation, the extent to which minorities and women are underrepresented would be worse than depicted in table 2.3. Bureau of Labor Statistics data shows that blacks, Hispanics, and white women have increased their representation in the civilian labor force in recent years. In addition, the Bureau's 1995 projections indicate that women are expected to make up 60 percent of the future growth in the labor force, and blacks will account for 20 percent of the growth. These changes will shift the work force composition and should have an important bearing on how State plans to meet its representation goals.

# Certain Personnel Processes Have a Disproportionate Impact on Minorities and Women

Our review showed that some of State's hiring, promotion, and assignment processes have a disproportionate effect on minorities and women. For example, State's recruiting efforts are not currently producing desired results, and the number of minorities who take the FS examination has been declining. Minorities pass the FS examination at only one-fourth of the rate of white males, and the rate at which black males fail to gain tenure is six times greater than the rate for white males. A disproportionate number of minorities and white women are assigned to administrative and consular work rather than political affairs assignments, which are generally considered more prestigious. While promotion rates for minority and white female FS officers are generally comparable to those of their white male counterparts, rates of promotion for several specialist categories are lower.

The legislative history of the provision in the Foreign Service Authorization Act, Fiscal Years 1988 and 1989, that called for our review indicates some congressional concern over the extent of FS representation from Ivy League universities. This matter is discussed in appendix I.

## Recruiting Efforts Are Not Producing Desired Results

State recruits applicants for the Foreign Service through visits to college campuses, career fairs, and media advertising. In recent years, recruiting efforts have not been successful in increasing the number of minorities who register for the FS examination. In fact, since 1985 the numbers have been declining. Although State had established broad goals for hiring 20 percent minorities and 30 percent females, it had not complied with federal regulations requiring identification of specific underrepresented groups as the basis for hiring goals. Affirmative action goals should focus on specific groups such as Asian-American/Pacific Islander males or females.

The Foreign Service Act of 1980 requires the State Department to develop recruiting strategies, in line with OPM requirements, to increase minority and female representation in applicant pools. The Personnel Bureau's Office of Recruitment, Examination and Employment is responsible for, among other things, State's EEO recruitment process and increasing the number of minority and female FS candidates.

Most of the Department's recruiting efforts are a part of State's affirmative action program. The efforts focus principally on recruitment fairs and mass advertising. The Recruitment Office provides information packages to colleges and universities describing opportunities in the Foreign Service and asks college coordinators to encourage minorities and

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women to take the annual written examination. Also each year, State Department recruiters visit colleges and universities with large minority enrollments.

State's recruiting efforts have not increased the number of minorities taking the FS examination for officer positions. Between 1985 and 1987, overall registrations for the examination decreased from 26,089 to 22,585 (a decline of 13 percent), but as table 3.1 shows, the number of minorities who registered for the examination decreased by 25 percent. The number of blacks who took the examination decreased by 35 percent. According to a State report, this decrease was caused at least in part by "reduced minority populations, particularly black students, in the nation's graduate and undergraduate institutions over the past several years."

**Table 3.1: Decline in the Number of Minorities Taking the Foreign Service Written Examination**

<b>Minority Group</b>	<b>1985</b>	<b>1986</b>	<b>1987</b>	<b>Percent change 1985-87</b>
Minority total	4,328	3,709	3,247	-25
Asian-American	957	939	843	-12
Black	1,894	1,352	1,224	-35
Hispanic	1,359	1,314	1,095	-19
Native American	118	104	87	-26

Our review of State records on applicants who took the examination showed that recruiting visits have produced some results. In 1987 State visited 107 colleges and universities. Students from 92 (85 percent) of these schools took the 1987 examination. Minority students from 69 (64 percent) of these schools took the examination. However, the declining trend in the number of minorities who take the examination is significant and indicates that State may need to seek alternative approaches for generating interest in the Foreign Service.

State has not complied with OPM recruiting requirements to develop specific recruiting strategies for each underrepresented group, accompanied by quantifiable indices against which progress toward eliminating underrepresentation can be measured. State does not have underrepresentation measures that are acceptable to EEOC. State's affirmative action plan does not include specific goals for each underrepresented group for eliminating underrepresentation. Therefore, State cannot effectively measure the progress of its recruiting efforts.

According to a 1987 consultant's study performed for the State Department, other federal agencies facing problems in recruiting qualified minorities and women have instituted innovative programs to increase the pool of potential candidates.

- The Air Force Logistics Command, in cooperation with the University of Dayton, developed a program to recruit individuals for an intensive engineering program. Graduates receive job offers from the Command. Over a 3-year period, female engineers increased from 2.6 percent to 5.7 percent, and black engineers increased from 2.1 percent to 5 percent.
- The Defense Mapping Agency developed a program with the University of Texas to identify high school and middle school students with the potential to become engineers and scientists and encouraged them (75 percent minority and 54 percent female) to pursue those fields. Over 50 percent of the students contacted in a follow-up study of the program planned to attend college and major in engineering or science.
- The Department of Interior assigns professionals to academic institutions with predominantly minority and female enrollment to assist the schools in developing curricula that would qualify the students for agency employment.
- The National Aeronautics and Space Administration has many unique programs around the country and in Puerto Rico to increase Hispanic, female, and other minority engineering candidates.

The State Department has attempted to generate interest in the Foreign Service through another approach—the diplomat-in-residence program. Each academic year since 1964, about 10 schools have been selected and senior-level personnel (often former ambassadors) have been assigned to these schools for research, writing, and teaching. The purpose of the program is to enable FS personnel who have spent extensive periods overseas to update their understanding of their own country and its contemporary views and priorities. A key part of the diplomat's responsibility is to generate interest in the Foreign Service. One of the 10 selected colleges has in the past usually been an historically black institution. Currently, the diplomat-in-residence program is ongoing at two historically black colleges (one is actually a consortium of several black colleges) and is being initiated at a third.

In 1986, the Secretary of State endorsed a recommendation by black FS officers to investigate ways of increasing minority enrollment in university courses that might improve an individual's chances of passing the FS examination. According to a State report, State examination officials are including action on this recommendation in recruiting and examining

trips to colleges and universities. State officials told us that they have occasionally targeted minorities and women for recruitment to meet certain Foreign Service specialist needs. However, State is unable to determine how effective such recruiting efforts for specific specialist positions have been because it has not compiled information on applicants for such positions, as required by EEOC. Nevertheless, our review showed that State did not meet its goals of hiring minorities and white women for certain specialist positions.

## The Foreign Service Written Examination

State Department records showed that, although the pass rate for white women is close to that of white men, minority men and women pass the FS examination at about one-fourth the rate of white men. However, State uses the "near-pass" program, which allows minorities who almost pass the examination to move on to the next step of the hiring process. Black FS officers recommended that State study the examination for cultural bias. Although the recommendation was endorsed by the Secretary of State in 1986, a study of possible cultural bias in the examination has not been done. Table 3.2 shows the disparity in the pass rates between whites and minorities who took the 1986 and 1987 written examinations.

**Table 3.2: Disparities Between Whites and Minorities in Passing the Foreign Service Written Examination**

Candidates	Minority		White		Not indicated <sup>a</sup>	Total
	Men	Women	Men	Women		
<b>December 1986 examination</b>						
Applicants	2,131	1,576	13,292	8,304	27	25,330
Takers	1,283	867	8,857	5,198	17	16,222
Passers	61	38	1,654	825	2	2,580
Pass rate	5%	4%	19%	16%		16%
<b>December 1987 examination</b>						
Applicants	1,868	1,379	12,091	7,247		22,585
Takers	1,039	730	7,733	4,401		13,903
Passers	53	38	1,602	795		2,488
Pass Rate	5%	5%	21%	18%		18%

<sup>a</sup>State's records did not indicate sex, race, or ethnic background of these individuals.

The failure of minority candidates to pass the examination in the same proportion as white candidates has raised the question of bias in the test. If a selection device, such as a test, has a disparate impact on minorities or white women, court decisions and EEOC guidelines require

that the test be “valid,” that is, demonstrably job-related or predictive of on-the-job performance or able to identify qualifications necessary for success on the job under consideration. A federal agency not in compliance with the 80-percent rule (if pass rates for women and other underrepresented groups are less than 80 percent of the pass rate of the dominant group, that is, white men) is expected to validate, modify, or drop the test. However, a selection process that at its end (the “bottom line”) employs representative numbers of the affected groups may be considered acceptable by the EEOC even though one or more of its elements may be unproved or suspect. However, this bottom line defense does not insulate the test from suit by individuals or classes injured by the test. The bottom line principle led the State Department to institute what it refers to as the near-pass program.

## The Near-Pass Program

As its name implies, the near-pass program, adopted in 1983, allows minorities whose test scores fall just below the passing score to move on to the next phase of the hiring process—the oral assessment.<sup>1</sup> This provides State with a larger pool of minority applicants from which to choose a representative number of minorities. As a result of the program, 28 percent of the minorities who took the written examination moved beyond this initial screening step. Table 3.3 shows how the near-pass program increased the pool of minorities that moved to the oral assessment phase.

**Table 3.3: Extent of State’s 1987 Near-Pass Program for Minorities**

<b>Minority group</b>	<b>Passed written test</b>	<b>Near passers</b>	<b>Total</b>
American Indian/Alaskan Natives	1	15	16
Asian American/Pacific Islanders	33	141	174
Blacks	12	99	111
Hispanics	45	157	202
<b>Total</b>	<b>91</b>	<b>412</b>	<b>503</b>

<sup>1</sup>The term oral assessment is somewhat misleading. The assessment actually involves the following procedures:

- An oral examination with two examiners, lasting 45 minutes.
- A written essay on an assigned topic, to be prepared within 45 minutes.
- A written summary exercise, lasting 45 minutes.
- A two-part group exercise, lasting approximately 80 minutes. The first part consists of a short oral presentation of a proposal to the group by each candidate, based on materials provided for this purpose. The second part is a leaderless group negotiating session to discuss and seek agreement on the disposition of the various proposals.
- A written in-basket test, lasting 90 minutes, in which the candidate deals with a series of problems and situations presented in written form.

Although examiners do not know if a candidate passed the written examination, near-pass candidates were not as successful as other minority candidates during the oral assessment. The rate at which near passers succeeded in the oral assessment was 17 percent compared with 31 percent for the minority candidates who passed the written examination. White males passed the oral assessment at a 29-percent rate, and white women passed at a 32-percent rate.

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### The Examination Process Has Been Questioned

Over the years there have been concerns as to whether the FS examination process is fair and equitable. As a result, the Foreign Service Act of 1946 created a Board of Examiners for the Foreign Service to ensure fair and equitable examination procedures based on merit principles. The 15-member board, appointed by the President, includes 5 public members who are experienced in the fields of testing or equal employment opportunity. The Board reviews the development and administration of the examination systems to accomplish these purposes, as well as to minimize possible adverse impact from the examinations on any race, sex, or ethnic group, and reports annually to the Secretary of State.

Since 1982 the Board has repeatedly requested information on or raised concerns about the reliability and validity of the entire selection process. For example, in 1986 the Board concluded that a systematic review of the career patterns of minority officers in the Foreign Service was needed to determine whether the recruiting and examination system was actually producing sufficiently competitive minority officers. The Board's 1988 report recommended what it referred to as a "criterion-based Foreign Service officer tracking system." Such a mechanism would allow, for the first time, the matching of a candidate's preemployment examination results with the appointed officer's career development—tenure, promotions, assignments, and awards. The Board strongly recommended that such a system be implemented for all junior officers. The Board concluded that there cannot and will not be a credible validation of the current selection process as a predictor of success in the Foreign Service until this tracking system is operative.

In addition to concerns over tracking, the Board called for an update of the 1982 job analysis, which has served as the basis for the current examination. According to the Board's staff, professional testing standards generally require updates of such job analyses at least every 5 years. However, according to Board reports, the update has not been done because of budget constraints.

In 1985, black FS officers recommended a review of the written examination for cultural bias. The Secretary of State approved this recommendation in 1986, but a review of the examination for cultural bias was never done. Instead, hiring statistics were analyzed and a conclusion drawn that “the near passer program offsets the cultural bias from the written [examination] alone.” Thus, the issue of possible cultural bias in the FS examination remains unresolved. While ultimate hiring rates (appointment) for minorities into FS officer positions are, according to State, within legally mandated criteria,<sup>2</sup> State has not attempted to learn why minorities do not pass the examination at the same rate as their white male counterparts.

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## **State Has Not Analyzed the Impact of Other Hiring Steps**

State had not analyzed other steps in its selection process to determine their impact on the hiring of minorities and women. As a result, there may be barriers to the hiring of minorities and women that have not been identified.

Because of the length of the hiring process, candidates who take the written examination may not receive an oral assessment until months later. If successful in the oral assessment, the candidate is given forms to complete for a background investigation and medical clearance, which must be submitted within 6 months. Candidates must also submit education transcripts, and officer candidates must submit a 1,000-word autobiography. On average, a background investigation requires about 5 months. However, some investigations take over a year, particularly when candidates have resided overseas. Thus, the information needed to finish processing an application may not be available until 2 years after a candidate has applied for a position.

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## **The Final Review Panel**

A four-member final review panel reviews the file on each candidate who has passed the written and oral examinations (oral only for specialists), submitted the necessary forms, and has a completed background/security investigation. The purpose of the review is to assign a “background/suitability” score to each candidate. Key factors in the score are (1) an evaluation of the candidate’s past conduct as evidenced by the background investigation and (2) the probability of the candidate’s success as an FS employee. Results of this review are weighted (24 percent) along with previously established scores—the written examination

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<sup>2</sup>Uniform Guidelines on Employee Selection Procedures, 43 FR 38,290 (1978), issued jointly by EEOC, the Civil Service Commission (now OPM), the Department of Labor, and the Department of Justice.

(24 percent) and the oral examination (52 percent)—to arrive at a final score.

Successful minority candidates for officer positions can be offered appointments immediately. In the case of security specialists, minorities were offered immediate appointments in 1987. Others are placed on registers in rank (score) order for the category of employment they are seeking. Their names remain on the register until hired or up to 18 months.

No records are kept on the reasons for the final review panel's selection decisions. Statistics for 1987 showed that minority officer candidates were eliminated at a 17.6 percent rate for males and a 14.8 percent rate for females. These rates are greater than the majority rates of 8.5 and 12.1 percent respectively.<sup>3</sup> State's statistics show that the panel process for specialist positions screened out 224 candidates (23 percent) of 973 candidates in 1987. There was no minority/majority breakout for specialist candidates.

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## Commissioning and Tenure Process

After 4 years of employment, FS employees are either offered tenure, or career status, or are "selected out" (that is, their employment is terminated). An internal State report on the results of its tenure process for June 1985 through June 1987 indicates that (1) white women are selected out of the FS officer corps at a rate lower than white men and (2) minorities, both men and women, are selected out at much higher rates. (See table 3.4.) For example, 17 percent of black men did not receive tenure, while only about 3 percent of white men were selected out. State officials attribute the wide disparities in the tenuring of white men and women compared with minorities to the fact that in the early 1980s, minorities were not required to take the written FS examination. For minorities who took the examination, State's analysis showed selection out rates comparable with those of the majority.

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<sup>3</sup>In 1986, minority candidates were eliminated by the final review panel at a lower rate than majority candidates.

**Table 3.4: Foreign Service Officers Not Tenured (1985-87)**

Rates in percent

Category	Male			Female		
	Total	Selected out	Rate	Total	Selected out	Rate
White	253	7	2.8	105	1	1.0
Black	23	4	17.4	15	1	6.7
Asian-American/Pacific Islander	10	1	10.0	3	0	0
Hispanic	28	3	10.7	8	1	12.5
American Indian/Alaskan Native	6	0	0	0	0	0

During the same period, however, no minorities failed to gain tenure in the specialist ranks, and the rate of white women selected out was lower than that of white men.

## Assignment of Foreign Service Personnel

The State Department has an extensive and complex assignment process. FS officers and specialists are assigned to headquarters and field posts on a rotating basis. About 1,500 FS personnel are reassigned each year. However, in response to minorities' concerns, State has established a program to aid minorities in obtaining "career enhancing assignments." Our review showed that the process of assigning FS officers to functional "cones," or work areas, has resulted in placing a disproportionate number of minorities and white women in functional areas that employee groups consider to be less desirable.

While FS specialists such as doctors and secretaries are hired for specific job functions, officers are placed in one of four broad functional work areas: political, economic, consular, and administrative affairs. The nature of work performed by each category follows:

- Political officers convey U.S. government views on political issues to foreign officials, negotiate agreements, and maintain close contact with political leaders, diplomats, and others of influence.
- Economic officers analyze and report on key economic trends and events that affect U.S. interests.
- Consular officers issue visas, help Americans overseas, and issue passports.
- Administrative officers manage overseas facility operations, including budgeting, maintenance, and supply.

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As indicated in table 3.5, in 1987 women of all races and ethnic backgrounds were represented in the consular cone at much higher rates than their overall rate in the Foreign Service. By comparison, minority males except Asian-Americans/Pacific Islanders were represented in the administrative cone in excess of their rate in State's work force. White males exceeded their work force composition in the economic and political cones.

**Table 3.5: Profile of Foreign Service Officer Assignments by Functional Work Area in 1987**

Figures in percentages					
<b>FS officers</b>	<b>Total</b>	<b>Administrative</b>	<b>Consular</b>	<b>Economic</b>	<b>Political</b>
<b>Male</b>					
White	70.15	62.20	55.85	77.47	76.35
Black	3.51	6.10	4.93	1.68	2.62
Hispanic	3.08	3.77	2.90	2.18	3.54
Native American	0.27	0.33	0.29	0.33	0.21
Asian	1.36	1.22	1.35	0.92	1.69
<b>Female</b>					
White	18.17	22.84	27.25	15.66	13.19
Black	2.03	2.44	4.83	0.67	1.23
Hispanic	0.72	0.67	1.16	0.42	0.72
Native American	0.06	0.11	0.19	0	0
Asian	0.60	0.33	1.16	0.59	0.41

The results of the FS written examination are used to determine an individual's ability to serve in each cone. Successful candidates who pass the examination are placed on one or more of the registers from which they may be hired for one of the four cones, depending on the score they achieved. When hired, candidates are advised that they should not accept appointment in one cone with the expectation of transferring to a different cone. In the case of minorities, as an affirmative action step to minimize past disparities in placement, the final review panel determines which functional register a candidate is placed on. The panel considers candidates' preferences in addition to the examination scores in assigning the cone. A recent State analysis showed an under-appointment of women to the political cone but concluded that the under-appointment was not statistically significant.

In its December 1988 interim report, the Commission on the Foreign Service Personnel System discussed the use of the FS examination as the basis for assigning employees to cones. The report noted that the Commission found widespread doubt about the validity of the current

practice of assigning functional designations largely on the basis of written examination scores. The Commission noted that most candidates pass in more than one functional area, which suggests that the examination questions do not distinguish effectively among applicants with regard to their strengths, interests, or aptitude for specific FS functions. The Commission also noted that entering officers who accept a designated cone before they really understand what the Foreign Service is all about and without realistic expectations regarding their prospects for advancement are not likely to make satisfactory choices.

While State employees have the general perception that promotions are more likely within the economic and political cones, 1985 through 1987 promotion statistics do not fully confirm this perception. The highest rate of promotion was within the consular cone with about 23 percent of eligible staff being promoted through grade 1. The administrative and political cones had promotion rates of about 19.5 percent, and the economic cone had the lowest promotion rate at 18 percent through grade 1. However, officers from the political cone experienced a higher rate of advancement to and within the Senior Foreign Service (see table 3.6).

**Table 3.6: Promotions for Senior Foreign Service Officers**

Functional area	Promotion to SFS <sup>a</sup>		Promotions Within SFS <sup>a</sup>	
	Number	Percent	Number	Percent
Administrative	28	9.56	16	6.78
Consular	23	12.37	6	5.61
Economic	41	9.38	34	8.06
Political	85	13.98	84	10.02

<sup>a</sup>Senior Foreign Service.

Over the 3-year period State analyzed, political and consular officers had the greatest chance of entering the Senior Foreign Service. Within the Senior Foreign Service, political and economic officers had the greatest chance of promotion.

## Promotion of Foreign Service Employees

FS officers and certain specialists may be administratively promoted to grade level 4. Above that level, or after lower graded specialists obtain career status, FS personnel must compete for promotion. Each year personnel are evaluated, and the evaluations are placed in the employees' files. Employees competing for promotion to the Senior Foreign Service must request to be considered. Promotion boards are formed for various categories and grades of employees. These boards review employees'

evaluation files and prepare rank order promotion lists. The boards may also recommend that employees with unsatisfactory performance be selected out.

Statistics on State's FS promotions from 1985 through 1987 show that no significant disparities existed in promotion rates for minorities and women when compared with white male rates. For example, the average promotion rate for the 3-year period was 18.9 percent, and there were about 3,000 promotions. The rate for white males was 19 percent (1,820 promotions), and the rate for white females was 18.5 percent (792 promotions). The promotion rate for minorities was slightly higher than the average at 19.4 percent (340 promotions). The highest promotion rate was recorded for Asian-American/Pacific Islander women—23 percent—and the lowest for American Indian/Alaskan Native women at 17.1 percent. While promotion rates were generally comparable overall, State's detailed analysis made the following points on FS officer promotions:

- For the last 3-year period, 20.7 percent of minority officers and 23.0 percent of white female officers were promoted, compared with 19.0 percent of white male officers.
- For promotions from class 01 to the Senior Foreign Service, minority officers were promoted at a higher rate (13.0 percent) than white males (11.5 percent) and white females (12.5 percent).
- For promotions within the Senior Foreign Service, minority officers were promoted at a lower rate (3.7 percent) than white males (8.8 percent) or white females (9.0 percent).
- For promotions within the mid-level classes, minority officers were promoted at a lower rate (15.6 percent) than white males (18.2 percent) or white females (18.2 percent).
- For promotions from grade level 4 to 3, minority officers were promoted at a lower rate (41.4 percent) than white males (49.2 percent) or white females (46.5 percent).

With two exceptions, specialist promotion rates were also fairly uniform. However, specialist promotion rates at the junior threshold for white women and from grade 4 and below for both minorities and white women were lower than the white male rates. State's analysis of specialist promotion rates follows:

- For promotions at the junior threshold, minority specialists were promoted at a lower rate (15.8 percent) than white males (19.6 percent) and at a higher rate than white females (10.9 percent).

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- For promotion from class 4 and below, minority specialists were promoted at a lower rate (19.3 percent) than white males (25.3 percent) and at a higher rate than white females (17.1 percent).
- Total minority specialists were promoted at a lower rate (17.7 percent) than white males (19.0 percent) but at a higher rate than white females (16.7 percent).
- For promotions to the Senior Foreign Service, minority specialists were promoted at a higher rate (9.1 percent) than white males (8.6 percent) and white females (0 percent because none were eligible).
- For promotions within mid-level grades, minority specialists were promoted at a lower rate (13.1 percent) than white males (13.6 percent) and at a higher rate than white females (10.9 percent).

We note, however, that promotion rates at the senior levels are based on a very small number of eligible minorities and white women. For example, black females were promoted to the Senior Foreign Service at a 33-percent rate (2 of 6) compared with an 11-percent rate for white males (170 of 1,518). Appendix II contains a summary of promotions for FS officers, and appendix III contains a summary of promotions for FS specialists during the period 1985 through 1987.

# The State Department Does Not Fully Comply With EEOC Affirmative Action Requirements

Our review indicated that for a number of years, the State Department had not fully complied with EEOC requirements for federal affirmative action programs established to eliminate the underrepresentation of minorities and women in the federal work force. Specifically, State has not

- analyzed underrepresentation in accordance with EEOC guidelines,
- established specific hiring goals for each underrepresented group,
- established goals for promotion and internal movement of minorities and white women,
- collected key data to enable it to monitor or evaluate the affirmative action program, or
- conducted analyses of barriers or impediments to EEO.

In October 1987, the EEOC asked State and other federal agencies to prepare a new 5-year affirmative action plan covering fiscal years 1988 through 1992. State's plan, which was due to the EEOC in February 1988, was submitted in December 1988.

## State's Affirmative Action Plans Did Not Meet EEOC Requirements

State's Office of Equal Opportunity and Civil Rights is assigned the responsibility for analyzing the Department's work force to identify underrepresented classes of employees in particular career ladders and occupations. The office is also responsible for developing State's affirmative action plans and goals.

The State Department did not develop affirmative action goals that met EEOC requirements because its goals were not targeted toward specific minority groups. State's underrepresentation analysis—the basis for affirmative action hiring goals—did not use civilian labor force data. While EEOC permitted agencies to use other work force measures, the measures State used were unacceptable to EEOC because they did not differentiate race, gender, and ethnic origin groupings, and resulting hiring goals (20 percent minorities and 30 percent females for officer positions) also did not differentiate among these groupings. In addition, State had not developed goals for eliminating underrepresentation at the mid- and senior levels of the Foreign Service.

## Inadequate Representation Analyses and Goals

While acknowledging the need to do so in 1982, State did not use EEOC's labor force data to establish representation goals or measure its progress. State's affirmative action plan for fiscal years 1982 through 1986 did not contain an analysis of underrepresentation in each racial, ethnic,

and gender group at various grade levels for FS officers or specialists as required by EEOC. In 1982 State acknowledged that separate goals by racial/ethnic subgroups had not been established but promised to conduct further analysis and set goals for functional areas and grade levels for future planning purposes. However, this had not been accomplished.

While broad hiring goals had been established for FS officers, State's plan did not contain any goals for the advancement of minorities and women to mid- and senior levels. As with officer goals, State had planned to follow EEOC guidance in establishing goals for specialists but had not done so. Instead, broad percentages had been established for hiring minorities and white women.

EEOC rejected State's affirmative action plans for fiscal years 1985 and 1986. According to EEOC's staff analysis, these plans did not provide indices for underrepresentation or establish goals. The EEOC's staff analysis of State's 1987 affirmative action plan made the following observations:

"Because of the unique problems encountered in different occupations by some, but not all, of the...minority groups..., EEOC directives require that Federal agencies separately analyze employment statistics for each of the...groups. If minority groups are combined for analysis, underrepresentation and personnel practices having an adverse impact on specific minority groups may not be identified.

"Indeed, any combination of groups for goal setting encounters a more serious problem. An employer may, in effect, be establishing affirmative action goals for a group not underrepresented in the employer's work force. For example, by setting a goal for 'minorities' in a specific occupation, although Hispanics are not underrepresented, and then recruiting and hiring an Hispanic as a result of the affirmative action goal, the employer would be in direct violation of Title VII [of the Civil Rights Act]. We know of no Court decisions or laws supporting this action.

"The Department of State's methodology...for establishing hiring goals in the Foreign Service Specialist occupations is flawed. ...State has simply established a goal for all 'minorities' without recognition that some groups are not underrepresented in some occupations. This methodology is arbitrary and inconsistent with the principles of affirmative action planning as defined by numerous Supreme Court Decisions."

State's affirmative action plans did not include specific goals or timetables for eliminating underrepresentation at more senior levels of the Foreign Service. State relied on the promotion of entry level FS officers to eliminate underrepresentation at more senior levels. State referred to this as the "flow through" of personnel. Upon reviewing the 1987

affirmative action plan, EEOC's staff advised State about their concerns over this approach:

"Our analysis of your work force indicates that the major equal employment opportunity problem at the Department of State is the underrepresentation of minorities and women at the higher grade levels of the Foreign Service. This problem will not be directly resolved through the entry level hiring of minorities and women, but rather through the internal movement or promotion of the individuals already employed in Foreign Service positions."

## More Effort to Improve Specialist Representation Needed

As with FS officers, State also established broad goals for hiring FS specialists for 1982-87. These goals (broken down by minorities and females for selected job categories) were not targeted toward specific race, ethnic origin, and gender categories as required by EEOC. As shown in chapter 2, when compared with the civilian labor force, underrepresentation exists in the FS specialist ranks. Table 4.1 summarizes State's fiscal year 1987 hiring goals for women and minority specialists and the extent to which they met these goals.

**Table 4.1: Actual Specialist Hiring in 1987 Compared to State's Goals**

Occupation	Minority		White women	
	Goal	Actual	Goal	Actual
Communications specialist	8	8	9	5
Finance	1	0	1	1
Security	35	8	42	11
Security engineers	13	1	8	2
Secretary	5	3	<sup>a</sup>	<sup>a</sup>

<sup>a</sup>Data not applicable.

As can be seen, State did not meet its goals in hiring women and minorities, particularly for security positions. A State official told us that during 1987 the Department had set affirmative action goals for qualified minority candidates for these security positions and that some positions had been kept vacant to allow for the completion of the processing of minority candidates who were in the processing pipeline<sup>1</sup> and known to be qualified for security positions. In spite of this, State did not meet its minority hiring goals for these positions, hiring only 8 minorities compared with its goal of 35.

<sup>1</sup>The lengthy hiring process at State—about 6 to 19 months—creates what is referred to as a "pipeline" of potential hires.

In another category of specialist—FS secretary—a State official advised us that recruiting efforts are aimed at attracting minority secretaries. While there is no affirmative action hiring preference, such as the near-pass program for FS officers, underrepresentation is significant in several race, ethnic, and gender categories. For example, although black women constitute about 9.3 percent of the comparable clerical civilian labor force, they represent only 4.9 percent of State's FS secretaries. Yet in 1987 only one black woman was hired as an FS secretary while 34 white women were hired. In response to concerns expressed by EEOC staff about underrepresentation of minority FS secretaries, State replied that the FS secretarial work force was best analyzed in combination with its Civil Service secretarial counterpart and that, taken together, State's clerical work force was 46 percent minority.

According to State recruitment and employment officials, data on the race, sex, or ethnic origin of applicants for specialist positions has not been developed or analyzed. EEOC Management Directive 707, effective January 1981, states that the collection of applicant flow data is critical in identifying barriers to full employment of underrepresented groups and monitoring the effectiveness of internal and external recruitment efforts. The EEOC directive requires that this information be collected at each stage of the selection process. The Uniform Guidelines on Employee Selection Procedures (Sept. 25, 1978) also require the collection of this information and provide systematic procedures to identify employment practices that indicate a disparate impact in regard to race, gender, or ethnic origin.

Since State has not compiled and analyzed this information, State officials did not know whether underrepresented minority group members were applying for vacancies at rates comparable to their numbers in the work force. Also, State officials did not know whether the rate at which minorities were hired was commensurate with the rate at which they applied for the positions. Without compiling complete applicant data, State cannot determine whether barriers exist that prevent minority groups from receiving fair consideration at all steps in the selection process.

## White Women Excluded From Mid-Level Affirmative Action Hiring

Although white women are underrepresented by about 311 positions at the mid-level of the FS officer corps, the State Department decided in 1987 to exclude them from the mid-level affirmative action hiring program. This was done, according to State officials, because of increased numbers of white women among the FS officers and because the agency had been dissatisfied by the progress of program participants. This decision will delay the full representation of white women at mid-levels.

Given the bottom entry, merit promotion, up or out FS personnel system at State, mid-level program participants have experienced some difficulty. However, we were told that, given adequate commitment, the program could succeed.

The low number of minorities and white women at the mid-level ranks and other factors led to the creation of a special hiring program for women and minorities at the mid-level of the Foreign Service in 1975. The objective of this program was to help overcome the time lag that would occur before full representation was reached at the mid-level grades if State depended only on promotion from the junior grades.

By the close of 1987, only 203 minorities and women had been appointed to mid-level positions in the Foreign Service since the affirmative action program began in 1975—an average of 17 hires per year. Mid-level hires reached a peak of 36 in 1981. In January 1987, State modified the program by opening it only to minority candidates. There were only six mid-level hires in 1987 under the modified program.

## Outlook for Women FS Officers

If the promotion rates of white women continue at the current levels, absent any factors such as mid-level hiring, it could be several years before the State Department achieves full representation at these levels. Table 4.2 demonstrates this problem.

**Table 4.2: Representation of White Women in the Foreign Service Officer Ranks as of 1987**

Grade mid-level	Total FSOs <sup>a</sup>	White women on board	Needed for full representation	Shortfall	Average annual promotions of white women
01	837	94	225	131	21
02	1,015	156	273	117	32
03	1,017	210	273	63	36

<sup>a</sup>Foreign Service officers.

As noted earlier, State has not established a work force profile acceptable to EEOC as a basis for its affirmative action efforts. Without such a profile and any specific goals and timetables for movement within the Foreign Service, it is difficult to evaluate State's success. Between 1981 and 1987 State eliminated entry-level underrepresentation of white women, but even with the mid-level affirmative action hiring of white women during most of that period, white women continued to be underrepresented at the mid-level.

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## Analyses of Possible Impediments to EEO Should Be Performed

According to EEOC, a critical element of agency affirmative action planning is the survey and identification of agency personnel policies, practices, and procedures that may impede progress in meeting affirmative action goals. Agencies are expected to prepare "barrier analyses" to identify possible impediments and outline action steps and timetables to eliminate barriers. EEOC cites examples of possible impediments as (1) the use of unnecessary educational or certification requirements, (2) agency rating panels that consistently exclude minorities and women, and (3) the lack of an effective mechanism for identifying and using minority and female recruitment sources.

State's Office of Equal Employment Opportunity and Civil Rights is responsible for monitoring and evaluating State's policies, practices, and procedures for possible adverse impact on minorities and women. The office is also supposed to review these areas in detail to identify existing barriers to hiring or advancing underrepresented classes and recommend corrective action to the Secretary of State and to personnel managers.

State's affirmative action plans include references to barriers. However, EEOC staff have criticized the plans because State did not identify the specific occupations from which the barriers tend to exclude certain people and the specific groups they tend to exclude. As shown in chapter 3, many of State's personnel processes appear to have had a disproportionate impact on minorities and white women when compared with white males. The Secretary of State has endorsed at least one barrier analysis (for cultural bias in the written examination). In this case, State officials did not analyze the test for cultural bias but instead analyzed ultimate hiring rates.

According to State's 1987 affirmative action plan, women and minorities are not as well represented in the political and economic cones as in the other two cones, and the plan identified that as a barrier. This situation

may be the result of a barrier in the assignment process. The written examination has been a key mechanism for determining assignment to cones and may be an unintended barrier to the assignment of minorities and women to the economic and political cones.

In commenting on State's 1987 affirmative action plan, EEOC staff noted some improvements over previous plans. However, EEOC staff also noted that, overall, State's efforts do not address the problem of identifying and eliminating unnecessary selection barriers, as required by EEOC directives.

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## Impact of Current Affirmative Action Guidelines

In October 1987, EEOC issued EEO Management Directive 714 to provide agencies with guidance on multiyear affirmative action plans for fiscal years 1988 through 1992. Among other things, the revised guidance

- requires the commitment of the agency head and senior managers to affirmative employment programs,
- requires identification and removal of barriers at all levels of the work force,
- provides agencies greater flexibility of action to meet their EEO program needs, and
- allows for numerical goal setting if there is a manifest imbalance or conspicuous absence of minorities and women in the agency's work force.

One of the key differences from previous EEOC guidance (EEO Management Directive 707 and 707A) is that Management Directive 714 makes agency goals (numerical objectives) optional.

According to an EEOC analysis, Management Directive 714 seeks to build on the progress most agencies made during the previous 6 years. That period concentrated on a rigid hiring approach. The major thrust of Management Directive 714, and the next logical step after hiring members of the protected classes, is elimination of practices, procedures, and policies that hamper the internal movement of the protected classes.

The EEOC plans to conduct on-site reviews of agency affirmative action programs and may direct certain actions, such as the establishment of goals, if, for example, it finds continuing manifest imbalance.

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# Conclusions, Recommendations, and Agency Comments

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Our review indicated that the State Department had made progress in increasing the representation of minorities and women in the Foreign Service since 1981. However, State had not fully complied with EEOC guidelines on affirmative action planning. State has not established an effective affirmative action plan or program and has not eliminated underrepresentation in the Foreign Service.

We believe that State can improve its affirmative action planning by analyzing which racial, ethnic origin, and gender groupings are underrepresented at what grade levels. This kind of analysis should enable State to better focus its efforts in FS recruiting and to look to alternatives for increasing representation, such as promotion and movement of employees and expanding its mid-level hiring. State's first step should be to define what constitutes the population against which the Foreign Service, both officers and specialists, will be compared, or to accept the labor force data issued by EEOC.

We recognize that under the current EEOC guidance, the establishment of numerical goals for the hiring and advancement of minorities and women is now optional. However, it may be helpful for State to have this kind of framework to structure its affirmative action program.

The State Department has made efforts to recruit minorities and women; however, we believe that by identifying underrepresentation in specific groups and targeting its recruiting efforts accordingly, State would be more successful in this effort. If State were to consider additional innovative ways—as other agencies have done—it might stimulate more minority interest in the Foreign Service.

State has developed the near-pass program in an effort to overcome the low rate at which minorities pass the FS examination and increase the number of minorities hired. However, minorities are concerned that the examination is inherently biased. Therefore, we believe that State needs a system for validating the examination as a predictor of success, as called for by the Board of Examiners, and making changes needed to improve the hiring process rather than compensate for its weaknesses as is done by the near-pass program.

State needs to increase the representation of minorities and white women in some FS specialist positions. Hiring goals for some specialist positions have not been achieved. State should also develop and analyze statistics on FS specialist positions, such as the number of applicants who are minorities and women. Without this information State cannot

focus its recruiting efforts on improving representation in the FS specialist ranks.

Other issues need to be analyzed as well. For example, why do the examination and the related assignment process result in disproportionate assignments of minorities and white women to the administrative and consular cones? Conversely, does the examination pose barriers to the entry of minorities and white women into the economic and political cones?

Evidence suggests that the final review panel process has a significant impact on the hiring of FS employees. Therefore, State needs to analyze this process, using EEOC guidelines, to determine whether it adversely affects the hiring of minorities and white women.

State information on promotion rates indicates generally comparable rates for white male, white female, and minority officers. The only exception is the promotion of minorities within the Senior Foreign Service. In the specialist ranks, however, minorities and women are promoted at lower rates than white males in two of five promotion categories. We believe State should determine what is causing these differences.

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## Recommendations

We recommend that the Secretary of State, to address the problem of underrepresentation in the Foreign Service, take the following actions:

- Establish numerical goals for hiring and advancement by race, ethnic origin, and gender category.
- Compile information needed, such as the race, ethnic origin, and gender of applicants for FS specialist positions, to monitor the implementation and progress of affirmative action efforts.
- Analyze personnel processes for artificial barriers and eliminate any barriers found. Such analyses should include determinations of
  - (1) whether the FS written examination is a valid predictor of success in light of current FS job requirements,
  - (2) why minorities and women are eliminated at a higher rate than white men by the final review panel process,
  - (3) why women and minorities are disparately assigned to certain cones, and

(4) whether artificial barriers hinder the promotion of minorities and white women in the FS specialist ranks and the advancement of minorities in the Senior Foreign Service.

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## Agency Comments and Our Analysis

In commenting on this report, the State Department indicated that corrective actions would be, or already have been, initiated (see app. IV). The Department said it would

- alter the 5-year affirmative action plan as needed, including the establishment of specific goals to eliminate underrepresentation;
- compile more extensive information on the race and gender of applicants for specialist positions to monitor affirmative action progress; and
- undertake a new job analysis that will underpin a redesigned written examination in an attempt to eliminate any disparate impact. State has already taken steps to modify the scoring of the written examination, including the functional field tests, to ensure that these tests will not work against minorities and women when they are assessed by the final review panel.

The EEOC generally agreed with the report but reiterated that it no longer required agencies to develop numerical goals and that goals are not the only means of achieving equal employment opportunity in the federal government (see app. V). Although numerical goals are no longer required, we concluded that the establishment of numerical goals is important in this case. The establishment of affirmative action goals would (1) reflect management's commitment to affirmative action, (2) help State allocate its recruiting resources to areas of greatest need, (3) mesh affirmative action planning with the personnel planning process, (4) project expected program results, (5) provide an effective basis for measuring progress, and (6) ensure program accountability.

EEOC stated that our findings were consistent with its analyses of State's affirmative action plans. EEOC noted that State should conduct more effective analyses of its personnel processes, focusing on policies, practices, systems, and procedures that may serve as problems and barriers to employment for EEO groups.

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# Ivy League Representation

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The legislative history of the provision in the Foreign Service Authorization Act, Fiscal Years 1988 and 1989, that called for our review indicates some congressional concern over the extent of FS representation from “Ivy League” universities.<sup>1</sup> Using State’s automated personnel records we found that 226 of the 549 senior Foreign Service personnel—or 41 percent—had attended one or more of the eight Ivy League institutions. We did not determine whether the employees had obtained undergraduate or graduate degrees or had attended courses or seminars at these schools, since some records did not contain evidence of a degree. By comparison, the records on personnel hired since 1981 show that about 16 percent of these employees had attended one or more Ivy League institutions.

Our analysis of the backgrounds of nominees to positions of ambassador or other senior-level posts, such as assistant secretary, from late 1985 through early 1988, showed that 45 percent of the nominees had attended Ivy League institutions prior to joining the Foreign Service. In addition, 11 percent of the employees who had not previously attended Ivy League institutions were assigned to positions or training at these schools after entry into the Foreign Service.

According to State’s information, applicants from Ivy League universities pass the written examination at a very high rate. For example, the overall pass rate on the December 1986 examination was 16 percent. Ivy League schools were among the top 20 based on pass rates—Princeton, 64.0 percent; Yale, 60.0 percent; Harvard, 51.7 percent; Dartmouth, 43.3 percent; Brown, 42.1 percent; Columbia, 40.0 percent; and Cornell, 38.6 percent.

Ivy League schools also provide a good source of minorities who pass the examination. Three were among the top 20 schools in the number of minorities passing the 1986 examination: Harvard, eight passers; Yale, four passers; and Cornell, two passers. Harvard also ranked in the top 20 among the number of applicants, including minorities, who took the 1986 examination.

Independent evaluations of colleges and universities rank the Ivy League schools high in many academic categories, which probably accounts for the success of their students in taking the FS examination.

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<sup>1</sup>These schools include Brown, Columbia, Cornell, Dartmouth, Harvard, Pennsylvania, Princeton, and Yale.

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**Appendix I**  
**Ivy League Representation**

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These schools have been ranked in the most competitive category and among America's best colleges.

# Promotions of Foreign Service Officers (1985-87)

Grade	Total male	Total female	White male	White female
<b>CM to CA</b>				
Eligible	78	4	74	4
Promoted	2	0	2	0
PCTPR	2.6	0	2.7	0
<b>MC to CM</b>				
Eligible	757	30	732	30
Promoted	19	0	19	0
PCTPR	2.5	0	2.6	0
<b>OC to MC</b>				
Eligible	738	32	714	32
Promoted	115	6	113	6
PCTPR	15.6	18.8	15.8	18.8
<b>O1 to OC</b>				
Eligible	1,427	118	1,356	112
Promoted	164	16	156	14
PCTPR	11.5	13.6	11.5	12.5
<b>O2 to O1</b>				
Eligible	1,784	418	1,540	358
Promoted	318	74	291	64
PCTPR	17.8	17.7	18.9	17.9
<b>O3 to O2</b>				
Eligible	1,495	602	1,260	482
Promoted	361	113	310	96
PCTPR	24.1	18.8	24.6	19.9
<b>O4 to O3</b>				
Eligible	742	325	616	229
Promoted	356	146	303	107
PCTPR	48.0	44.9	4.9	49.2

**Appendix II  
Promotions of Foreign Service Officers  
(1985-87)**

Black male	Black female	Hispanic male	Hispanic female	American Indian male	American Indian female	Asian American male	Asian American female
3	0	1	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
10	0	11	0	0	0	4	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
13	0	10	0	0	0	1	0
2	0	0	0	0	0	0	0
15.4	0	0	0	0	0	0	0
40	6	24	0	3	0	4	0
4	2	3	0	0	0	1	0
10.0	33.3	12.5	0	0	0	25.0	0
104	38	113	10	7	5	20	7
12	6	13	2	0	1	2	1
11.5	15.8	11.5	20.0	0	20.0	10.0	14.3
116	81	75	25	10	0	34	14
28	7	14	6	2	0	7	4
24.1	8.6	18.7	24.0	20.0	0	20.6	28.6
56	58	35	23	7	1	28	14
22	17	20	12	3	0	8	10
39.3	29.3	57.1	52.2	42.9	0	28.6	71.4

**Legend**

CA — Career Ambassador  
 CM — Career Minister  
 MC — Minister Counselor  
 OC — Counselor  
 PCTPR — Percent of eligible employees promoted

Source: Department of State.

# Promotions of Foreign Service Specialists (1985-87)

Grade	Total male	Total female	White male	White female
<b>MC to CM</b>				
Eligible	51	3	51	(
Promoted	0	0	0	(
PCTPR	0	0	0	(
<b>OC to MC</b>				
Eligible	104	3	98	(
Promoted	4	0	4	(
PCTPR	3.8	0	4.1	(
<b>01 to OC</b>				
Eligible	173	6	162	6
Promoted	15	0	14	0
PCTPR	8.7	0	8.6	0
<b>02 to 01</b>				
Eligible	558	83	517	70
Promoted	64	4	61	4
PCTPR	11.5	4.8	11.8	5.7
<b>03 to 02</b>				
Eligible	876	162	808	143
Promoted	140	24	128	20
PCTPR	16.0	14.8	15.8	14.0
<b>04 to 03</b>				
Eligible	697	320	638	284
Promoted	136	35	125	31
PCTPR	19.5	10.9	19.6	10.9
<b>05 to 04</b>				
Eligible	704	638	611	586
Promoted	81	42	73	39
PCTPR	11.5	6.6	11.9	6.7
<b>06 to 05</b>				
Eligible	336	871	284	793
Promoted	141	97	125	89
PCTPR	42.0	11.1	44.0	11.2
<b>07 to 06</b>				
Eligible	135	820	113	709
Promoted	111	169	94	150
PCTPR	82.2	20.6	83.2	21.2
<b>08 to 07</b>				
Eligible	7	508	6	437
Promoted	3	196	2	172
PCTPR	42.9	38.6	33.3	39.4

**Appendix III  
Promotions of Foreign Service  
Specialists (1985-87)**

<b>Black male</b>	<b>Black female</b>	<b>Hispanic male</b>	<b>Hispanic female</b>	<b>American Indian male</b>	<b>American Indian female</b>	<b>Asian American male</b>	<b>Asian American female</b>
0	3	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
3	3	3	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
7	0	2	0	2	0	0	0
0	0	0	0	1	0	0	0
0	0	0	0	50	0	0	0
22	4	13	0	3	0	3	9
1	0	1	0	0	0	1	0
4.5	0	7.7	0	0	0	33.3	0
42	9	7	5	9	0	10	5
8	3	2	0	0	0	2	1
19.0	33.3	28.6	0	0	0	20	20
28	22	22	14	2	0	7	0
5	4	4	0	1	0	1	0
17.9	18.2	18.2	0	50	0	14.3	0
44	23	30	14	6	3	13	12
2	2	1	1	1	0	4	0
4.5	8.7	3.3	7.1	16.7	0	30.8	0
24	38	22	19	4	6	2	15
7	5	8	3	1	0	0	0
29.2	13.2	36.4	15.8	25.0	0	0	0
12	51	6	31	2	7	2	22
7	11	6	3	2	1	2	4
58.3	21.6	100	9.7	100	14.3	100	18.2
1	27	0	16	0	13	0	15
1	7	0	7	0	4	0	6
100	25.9	0	43.8	0	30.8	0	40.0

**Legend**

CA — Career Ambassador  
 MC — Minister Counselor  
 CM — Career Minister  
 OC — Counselor  
 PCTPR — Percent of eligible employees promoted

Source: Department of State

# Comments From the Department of State



United States Department of State

*Comptroller*

*Washington, D.C. 20520*

March 24, 1989

Dear Mr. Conahan:

I am replying to your letter of February 17, 1989 to the Secretary which forwarded copies of the draft report entitled "State Department - Minorities and Women Are Underrepresented In Foreign Service" (GAO Code 462572) for review and comment.

Enclosed are comments which were coordinated within the Department and prepared by the Bureau of Personnel.

We appreciate the opportunity to review and comment on the draft report.

Sincerely,

A handwritten signature in cursive script that reads "Roger B. Feldman".

Roger B. Feldman

Enclosure:  
As stated.

Mr. Frank C. Conahan,  
Assistant Comptroller General,  
National Security and  
International Affairs Division,  
U. S. General Accounting Office,  
Washington, D. C. 20548.

GAO DRAFT REPORT COMMENTS:  
STATE DEPARTMENT: MINORITIES AND WOMEN ARE  
UNDERREPRESENTED IN FOREIGN SERVICE  
(GAO CODE 462572)

The GAO report makes three principal recommendations. Comment is provided on each.

1. The Department should establish numerical goals for hiring and advancement by race, ethnic origin, and gender category to eliminate underrepresentation.

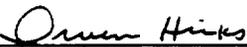
Comment: We agree that greater specificity in goal-setting could aid in eliminating underrepresentation, and will take steps to alter our five year affirmative action plan as needed.

2. The Department should compile more extensive information on race and gender of applicants for specialist positions, to monitor affirmative action progress.

Comment: We agree and will do so.

3. The Department should analyze the FSO selection process to see if the written exam and/or final review panel process act as barriers against the appointment of women and minorities in general, as well as for certain conal designations.

Comment: The Department is now undertaking a new job analysis that will underpin a redesigned written exam in an attempt to eliminate any disparate impact therein. We have already taken steps to modify the scoring of the written exam, including the functional field tests, to ensure that these portions of the test will not work against women and minorities when they are assessed by the final review panel.

  
\_\_\_\_\_  
Irvin Hicks  
Deputy Assistant Secretary  
for Personnel

# Comments From the U.S. Equal Employment Opportunity Commission



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

MAR 7 1989

Frank C. Conahan  
Assistant Comptroller General  
U.S. General Accounting Office  
Washington, D.C. 20548

Dear Mr. Conahan:

This is in response to your request for the Equal Employment Opportunity Commission's comments on a draft report entitled, State Department: Minorities and Women are Underrepresented in Foreign Service. The report provides a comprehensive examination of the Department of State's noncompliance with EEOC management directives implementing the statutory requirements for Federal agency affirmative employment programs. GAO's findings are consistent with our evaluation letters dated January 26, 1986, May 15, 1986, May 12, 1987, and September 19, 1988, to the Department of State regarding our analysis of their affirmative employment submissions.

The report's executive summary contains the recommendation that the Secretary of State establish numerical goals for hiring and advancement by race, ethnic origin, and gender category to eliminate underrepresentation in the Foreign Service. It is noted that EEOC's guidance in EEO-MD-714, dated October 6, 1987, does not require the development of specific numerical goals and we would have recommended that State give more emphasis to the analysis of their personnel process, specifically barriers or problems that diminish employment opportunities for minorities and women. We recognize that numerical objectives (goals) are not the only mechanism to achieve equal employment opportunity in the Federal Government.

In this instance, it is clear that the Department of State should conduct a more effective analysis of its personnel process, especially as it relates to the Foreign Service. A critical part of each Federal agency's multi-year affirmative employment planning is evaluation of agency personnel and management policies, practices, systems, and procedures which may serve as problems and barriers to employment for EEO Group(s). After barriers/problems are identified, Federal agencies should establish objectives for the accomplishment of the appropriate corrective action.

Appendix V  
Comments From the U.S. Equal Employment  
Opportunity Commission

Central to the success of an affirmative employment program is strict accountability at all levels of management from the head of the agency through the frontline supervisor. EEO-MD-714 holds agency heads, as well as senior officials, responsible for ensuring compliance with affirmative employment program instructions issued by EEOC.

In our evaluation letters to State, we have criticized State's affirmative action plans for not developing barrier analyses which clearly provide the required information such as barrier description, the occupations from which the barrier tends to exclude people, the groups it tends to exclude, and how State will eliminate the barrier.

EEOC is responsible for providing affirmative employment program guidance, monitoring the implementation of affirmative employment programs, and overseeing the government-wide discrimination complaint process. EEOC does not initiate investigations under the Uniform Guidelines on Employee Selection Procedures.

GAO's summary of EEOC affirmative employment requirements applied to EEO-MD-707 and EEO-MD-707A which were in effect between 1981 and 1987. The current management directive, EEO-MD-714, became effective October 6, 1987, and has different program requirements, specifically optional numerical objectives (goals). State's multi-year plan under EEO-MD-714 was due to the EEOC on February 15, 1988, and submitted on December 14, 1988. This new plan is currently being revised in order to bring it into compliance with the new directive.

We thank you for the opportunity to provide comments on this draft report.

Sincerely,

  
James H. Troy  
Director  
Office of Program Operations

# Major Contributors to This Report

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