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Report to Secretary, Department of Agriculture; by Henry Eschwege, Director, Federal Personnel and Compensation Div.

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Following 1973 and 1974 studies that stressed the lack of skills surveys and the academic orientation of the Upward Mobility program, the Department of Agriculture has revised its Upward Mobility program to combine career opportunities, job opportunities, and skills training. Findings/Conclusions: There is still a need to increase the use of employee skills information in support of Upward Mobility objectives. The Department has not issued guidance to its agencies concerning the use of skills surveys and, as a result, the agencies have conducted only limited surveys. While the College Study program has provided academic training to low-level Department employees, controls over the program are not effective. The Department has established selection and evaluation procedures for Upward Mobility participants, but these procedures have not been implemented in accordance with specific training requirements. A recent study recommending increased use of specific technician training has been generally ignored, even though several agencies have fallen short of their Upward Mobility position goals. Upward Mobility cost information submissions are generally unreliable. Recommendations: Improvements can be made in the Upward Mobility program by: (1) increasing the use of employee skills information in support of objectives; (2) strengthening controls over the headquarters College Study program; (3) implementing Job Opportunity and Skills Training program selection and evaluation procedures more effectively; (4) increasing the use of job restructuring to create additional technician positions; and (5) strengthening cost reporting procedures. (RRS)



*UNITED STATES
GENERAL ACCOUNTING OFFICE*

**Upward Mobility Program
Can Be Improved**

Department of Agriculture

The Department's College Study Program has provided college training for low-level employees. Also, new jobs are provided for other low-level employees under the Career Opportunities Program and Operation Upgrade. Improvements can be made in such areas as the use of employee skills information; program controls; selection and evaluation; job restructuring; and cost reporting.



UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

COMMUNITY AND ECONOMIC
DEVELOPMENT DIVISION

B-70896(2)

The Honorable
The Secretary of Agriculture

Dear Mr. Secretary:

We have completed a review of the Department of Agriculture's Upward Mobility program. Our objectives were to assess the Department's use of job restructuring in promoting upward mobility objectives and to review the progress which has taken place. We reviewed the Department's upward mobility efforts at Forest Service, Agricultural Research Service, Agricultural Marketing Service, and the Office of Investigation headquarters. We also examined departmental and agency policies, procedures, and guidance issued on upward mobility as well as program evaluation procedures.

The Department formed an Upward Mobility Task Force in 1971 which recommended that a departmental upward mobility program be implemented. The first guidance for this was issued in August 1973 and provided for an upward mobility program for employees in the Washington, D.C., metropolitan area. The program had four major parts:

- General Educational Development Program.
- The College Study Program.
- Operation Upgrade.
- The Career Opportunities Program.

Our 1973 and 1974 review of upward mobility programs resulted in a report to the Congress entitled, "Upward Mobility Programs in the Federal Government Should Be Made More Effective" (FPCD-75-84). This review included the Department's Upward Mobility program. On May 9, 1974, we discussed the program, including academic training and lack of skills surveys, with Department officials. At that time we indicated that the Upward Mobility plan appeared to be academically oriented. We stressed that the lack of skills

survey and the academically oriented training program could possibly be in violation of chapter 41, title 5, U.S.C. (formerly the Government Employees Training Act). In September 1975 the Department began revising its upward mobility guidance to combine the Career Opportunities program and the Operation Upgrade program into the Job Opportunities and Skills Training program.

The Department's College Study program provides college training for low-level employees. Also, new jobs are provided for other low-level employees under the Department's Career Opportunities program and Operation Upgrade. In our opinion, improvements can be made in the upward mobility program by:

- Increasing the use of employee skills information in support of upward mobility objectives.
- Strengthening controls over the headquarters College Study program.
- Implementing Job Opportunity and Skills Training program selection and evaluation procedures more effectively.
- Increasing the use of job restructuring to create additional technician positions.
- Strengthening cost reporting procedures for upward mobility activities.

General Educational Development was not included in our review because the Civil Service Commission does not consider it to be an upward mobility program and we agree with the Commission.

Each of the above matters and our recommendations are discussed in detail in the following appendixes. In our opinion, adoption of the recommendations would strengthen the Department's upward mobility efforts.

The Director of Career Development, Office of Personnel, generally agreed with these recommendations. He stated that he will consider incorporating our recommendations in the revised Upward Mobility program guidance.

We would appreciate being advised of any actions planned or taken with respect to our recommendations. Also, as you know, section 235 of the Legislative Reorganization Act

of 1970 requires the head of a Federal agency to submit a written response on actions taken on our recommendations to the House and Senate Committees on Government Operations not later than 60 days after the date of the report and the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the Committees mentioned above and to the Senate Committee on Labor and Public Welfare; the House Committee on Education and Labor, Subcommittee on Equal Opportunities; and the Civil Service Commission. We are also sending copies to the Chief of the Forest Service; to the Administrators of the Agricultural Research Service and the Agricultural Marketing Service; and to the Directors of the Offices of Investigation, Personnel, and Audit.

We appreciate the cooperation and courtesy extended to us by Department officials during our review.

Sincerely yours,

A handwritten signature in cursive script that reads "Henry Eschwege".

Henry Eschwege
Director

NEED TO INCREASE THE USE OF EMPLOYEE
SKILLS INFORMATION IN SUPPORT OF
UPWARD MOBILITY OBJECTIVES

Executive Order 11478 dated August 8, 1969, states that agencies must use the present skills of each employee and provide the maximum feasible opportunities to employees to enhance their skills. Civil Service Commission (CSC) guidance on upward mobility, issued after the Department of Agriculture's implementation of its program, notes the importance of reviewing employee skills, through means of a skills survey, to determine if vacancies can be filled by employees who already meet the required qualifications. A skills survey is a prerequisite to establishing upward mobility target jobs.

Chapter 41, title 5, U.S.C. (formerly the Government Employees Training Act) prohibits training in a non-Government facility for a position involving a promotion if there is a qualified employee available. CSC stated in its training guidance that agencies must be aware of the knowledge, skills, and abilities of its employees. The ability, potential, and suitability of employees already qualified for positions must be considered before training employees in non-Government facilities (institutions) for these positions.

The Department currently provides training in non-Government institutions as a part of its College Study program. In addition, target jobs for Career Opportunities and Operation Upgrade participants have been established and filled. Although these target jobs and formal training programs at nongovernmental facilities have been established, the Department has made only a limited effort to gather and use employee skills information in its upward mobility programs.

In a May 1974 meeting with Department officials, we emphasized the lack of skills surveys. In a May 1974 response, the Director of Personnel stated that a skills survey identifying clerical employees with college degrees as underutilized had been conducted and a report would be issued concerning this. According to Department officials, placement efforts under this program failed because (1) some employees were not completely analyzed, (2) some employees lacked mobility, and (3) some agencies failed to adequately match vacancies with available employees. Although this limited survey was undertaken, no skills survey

of the entire target population had been conducted by the Department as of June 3, 1976. The Department's upward mobility guidance does not address the use of skills surveys in upward mobility programs. Consequently, skills surveys generally are not done on a Department-wide or agency basis.

Skills survey information was not available for determining target jobs for the Career Opportunities program and the Operation Upgrade program. Both the overall position assessment by the Department and the determination of the specific target positions by the agencies were established without skills surveys having been performed. Consequently, positions may have been filled by unqualified employees with high potential (requiring training) when fully qualified employees (requiring no training) may have already been available.

Employee skills information is not considered in authorizing upward mobility training. Officials in all four agencies advised us that skills surveys had generally not been conducted and they had no way of assuring that the skills being trained for did not already exist within the work force. Officials in two of the agencies advised us that they had access to information on employees' present job skills but had no way of determining skills acquired in positions held prior to their present job. One agency official said his agency was in the process of obtaining this type of information.

A printout of clerical employees with degrees showed that many employees were being trained when the skill already existed in the work force at the clerical level. More specifically, 64 clerical employees in the Washington, D.C., metropolitan area already had degrees in the same majors as College Study program training participants. The authorizations for College Study program training contain a certification that the training is in compliance with the chapter 41, title 5, U.S.C., which states that training of an employee in a non-Government facility may be authorized only after considering fully trained employees who are available or may become available.

Because the Department and agencies are training in non-Government facilities, but have not properly conducted skills surveys, they may be violating chapter 41, title 5, U.S.C.

CONCLUSIONS AND RECOMMENDATIONS

The Department has not issued guidance to its agencies concerning the use of skills surveys. Consequently, the agencies have only conducted limited surveys and neither they nor the Department have made full use of these.

We recommend that the Secretary of Agriculture direct appropriate program officials to issue definitive policy, guidance, and procedures on the use of skills surveys in upward mobility programs. Emphasis should be placed on use of skills information in the job training authorization process and in developing target jobs.

NEED TO . RENGTHEN CONTROLS OVER THE
HEADQUARTERS COLLEGE STUDY PROGRAM

In November 1971 the Secretary of Agriculture appointed a Secretary's Task Force on Upward Mobility to analyze existing upward mobility programs, assess their effectiveness, and recommend a coordinated program for the Department of Agriculture. Two of the recommendations of the Task Force supported establishment of programs providing college training for Department employees in the Washington, D.C., area in one-grade interval series jobs GS-10 and below.

In August 1973 the College Study program was initiated as part of the Department's Upward Mobility program. It called for providing undergraduate academic training, primarily during duty hours, for eligible employees in the Washington, D.C., area in one-grade interval series jobs GS-10 and below (changed to GS-9 and below in September 1975). The training was to provide participants with a course of study which would help them qualify for a professional occupational discipline within the Department. As of August 1976 there were 193 participants in the College Study program. Agriculture has paid the University of Maryland approximately \$320,000 for training from inception of the program through the spring 1976 semester.

While this program has provided headquarters employees with an opportunity to obtain undergraduate academic training, our review showed that (1) controls do not insure that training is in compliance with chapter 41, title 5, U.S.C., (2) controls do not insure the effective use of training during duty hours, and (3) the current level of academic counseling may be excessive.

CONTROLS DO NOT INSURE THAT
TRAINING IS IN COMPLIANCE WITH
CHAPTER 41, TITLE 5, U.S.C.

All Government employee training programs are governed by chapter 41, title 5, U.S.C., which sets forth requirements and restrictions for training. Federal departments and agencies must identify target jobs to make sure that training is related to present or potential job duties within the agency (5 U.S.C. 4101). Also, agencies are prohibited from educating an employee in a non-Government facility (institution) solely for an academic degree (5 U.S.C. 4107).

College Study program training is designed to help employees in one-grade interval series jobs GS-9 and below to

"meet the educational requirements of professional occupational disciplines found within the Department of Agriculture." This training is usually authorized on the claimed basis of future Department manpower needs and not on needs relating to the job duties of the participant.

The training authorization process should determine that courses being taken by the participant are related to manpower needs of the Department. Authorizations are reviewed by the participant's supervisor and one or more appropriate agency officials. According to departmental guidance this is to be completed before the start of training. Specific courses to be taken must be listed on each authorization.

Authorizing officials in several agencies stated they do not have information identifying the manpower needs of the Department. Also, individual career development plans, which outline job progression and the training and experience required to qualify for a target occupational series, were not required for participants. This lack of information makes an effective determination of training needs impossible.

All 303 training authorizations available as of July 8, 1976, showed that:

- In 253 instances, the specific courses being taken were not identified on the authorizing document.
- In 218 instances, the required review by one or more appropriate agency officials was not conducted.
- In 115 instances, authorization for training did not take place until after the course had started.
- In 10 instances, authorization for training did not take place until after the course was completed.

This has resulted in approval of individual courses which have little or no relationship to Department manpower needs. For example, participants have been authorized to take such courses as Music and Art History.

While Department guidance indicates that College Study program training should not be authorized solely for the purpose of obtaining an academic degree, it is evident that this occurs. For example, participants were able to choose their own "majors" or areas of concentration.

Although promotions or better jobs are not guaranteed for participants, several agency officials indicated that employee expectations have been raised. The last questionnaire sent to participants (in December 1974) indicated that 61 percent were satisfied with the program. However, employee bitterness has resulted in other Government agencies where participants successfully completed their academic training, but did not receive a promotion or better job. As of July 8, 1976, two out of three participants who graduated from the program had not received a promotion or better job.

Several efforts have been made to tighten the course approval process. On April 7, 1976, the Department's Office of Personnel instructed participants with 60 to 75 credit hours "to discuss their selection of majors with their supervisors and agencies." Also, University of Maryland counselors, together with the Office of Personnel, issued a new form on which they require participants to obtain their supervisor's approval for proposed course selections. Both actions, however, could have been accomplished within the existing authorization process.

CONTROLS DO NOT INSURE EFFECTIVE USE
OF TRAINING DURING DUTY HOURS

College Study program training is generally conducted during duty hours at onsite Department facilities. According to Department officials, this is to make sure that employees with high potential having outside commitments (such as a second job) would not be excluded from the program. CSC noted in its upward mobility guidance that such employees should be considered in upward mobility training. Reconciliation of training attendance with agency attendance records is important in this type of training.

Although training during duty hours provides opportunities for employees, our review showed that (1) many employees who are able to receive training after duty hours are being trained during duty hours, (2) reconciliation of class attendance records with agency attendance records is generally not occurring, and (3) training during duty hours may be inhibiting the career opportunities of participants.

According to Department officials, the decision to offer training during duty hours was not based on a formal analysis of the needs of the target population, but rather on informal judgments. To test this decision, we reviewed the applications of all participants as of July 1976. The application form requires the participant to indicate whether or not he is able to attend classes after duty

hours. Of 196 participants, 138 indicated they were able to attend classes after duty hours. Therefore, the Department is spending about \$132,000 in salaries per year training participants during duty hours who are able to be trained after hours.

The initial Agriculture-University of Maryland contract for the College Study program, required that attendance be monitored on a weekly basis and reported to the Department's training officer. In February 1976 a new procedure was adopted requiring counselors to maintain a record of class attendance which was to be forwarded directly to the appropriate agency training officer on a biweekly basis. The report lists each absence for each participant during the reporting period. These reports are to be reconciled with agency attendance records.

According to agency officials, the biweekly attendance procedure has been generally ineffective; biweekly reports have not been reconciled with the agency attendance records, and established procedures do not exist for forwarding these reports from agency training officers to the participants' supervisors. Several agency officials had not received all reports and the ones they had received were not on a biweekly basis. While most supervisors interviewed expressed confidence in their participants' attendance practices, instances of abuse were cited.

Agency officials also noted that the during duty hours feature may be a limiting factor in considering participants for promotion because supervisors do not want to fill positions with "part-time" workers. There is no departmental policy for terminating participation after the individual is qualified for promotion; this has been left to the constituent agencies.

LEVEL OF ACADEMIC COUNSELING SUPPORT MAY BE EXCESSIVE

In accordance with the contract, the University of Maryland provided three counselors for tutoring and academic counseling. This service cost the Department \$42,240 in excess of tuition and administrative charges for the period September 1, 1975, through August 31, 1976. Academic counseling included advice on curriculum and registration, referrals to remedial instruction, or tutoring assistance, as needed. Career counseling was not provided as part of this service.

According to a University of Maryland official, participants who were not meeting College Study program academic standards were counseled by a University counselor and then by the agency. As a result of both counseling sessions, the participant was either tutored, dropped from the program temporarily and enrolled in a remedial course, or dropped from the program completely. Tutoring sessions were generally conducted during regular work hours (with agency permission) or during lunch periods. The scope of these tutoring sessions were limited to the counselor's academic specialty. The Director of the Department's Career Development Division told us that the need for these sessions had diminished since the fall of 1975 and, therefore, the number of sessions had decreased.

There were many instances of disagreement between agency officials and University counselors. Control over courses taken by participants was the major area of contention. While the counselors advised students to take courses because they met University curriculum requirements, agency officials, who authorize the job-relatedness of courses, felt that such courses were not job-related and were reluctant to approve them. Nevertheless, the Department directed that the courses be approved, leaving the participants' supervisors with the impression that they had little control over training decisions.

Alternative methods of providing academic counseling may be available. For example, several employees at one agency, ranging from GS-3 to GS-12 were attending University of Maryland courses under other training plans. The services of University academic counselors were available to these employees as part of the tuition cost. No additional counseling fee was required. Most of these employees, however, initially received academic advice from their supervisors, and counselors were mainly used as a secondary source. Another option suggested by program officials was to have agency training officers provide the counseling service.

CONCLUSIONS AND RECOMMENDATIONS

While the College Study program has provided undergraduate academic training to a number of low-level Department employees, controls to insure that the program is not in violation of chapter 41, title 5, U.S.C., are not effective. Also, control over the training during duty hours feature requires improvement, and the current level of academic counseling support may be excessive.

We recommend that the Secretary of Agriculture require appropriate program officials to:

- Designate, within the framework of existing CSC guidance, a specific target occupational series for each participant. Changes in the target should be kept at a minimum.
- Develop individual career development plans for each participant outlining job progression, training needs, and experience required to qualify for the designated target occupational series.
- Restore the integrity of the training authorization process by (1) terminating the practice of authorizing courses after they have been initiated or completed, (2) requiring that specific courses to be taken by participants be listed on the authorizing documents, and (3) requiring that the review process be fully documented on the authorizing form.
- Reevaluate the need to train participants during duty hours.
- Strengthen the system for reconciling class attendance during duty hours with agency attendance records.
- Issue Department-wide guidance which would require that participants be removed from the College Study program when they have met requirements of their target occupational series.
- Reevaluate the need for onsite academic counselors. This reevaluation should consider alternative ways in which this service may be provided at a lower cost.

NEED TO IMPLEMENT JOB OPPORTUNITIES
AND SKILLS TRAINING PROGRAM SELECTION
AND EVALUATION MORE EFFECTIVELY

The Upward Mobility Task Force 1972 review resulted in another recommendation that the Department of Agriculture establish a specialized program to train employees for specific occupations (professional, administrative, and subprofessional).

As a result of the recommendation, the Department established the Operation Upgrade and the Career Opportunities programs. Both programs provided opportunities for clerical, technical, and administrative personnel in one-grade interval series jobs GS-10 and below to advance through formal and on-the-job training. The Operation Upgrade program provided opportunities for these employees to advance to more skilled jobs. The Career Opportunities program provided for advancement to professional positions. A September 1975 guideline revision combined the two programs into the Job Opportunities and Skills Training program and lowered the grade to GS-9.

In fiscal years 1974 and 1975 the Department assessed the 208 positions for the Career Opportunities and Operation Upgrade programs of which 167 were filled. Eighty-six of the program participants had completed their training at the time of our review.

Although the programs provide advancement opportunities, there are problems in the selection and evaluation of participants.

SELECTION OF PARTICIPANTS

Department guidance provides for an ad hoc Candidate Evaluation Committee to evaluate and rate the qualifications of potential program participants. It also requires that the Upward Mobility program use, when possible, the Department's training guidelines, which require that the job element technique be applied to each position to which the employee is assigned. This technique refers to the identification through job analysis, of the characteristics which lead to superior job performance. These characteristics (elements) are then used to judge position applicants. The guidance also requires that applicants be evaluated on their potential to perform the job satisfactorily. This evaluation is to be

based on the applicant's work history, training, education, and interviews. Selections are to be made on a competitive basis in accordance with the merit promotion plan.

Two of the agencies we reviewed had applied the technique on an individual position or occupational series basis; neither the Department nor the other two agencies had done so. Instead, the job element technique was generally applied on an occupational family basis. These categories can be quite large. For example, the personnel management family spans at least nine professional and subprofessional occupational series.

The Department's candidate evaluation procedure ranks applicants based on their potential to perform duties in certain occupational families. However, the list of qualified candidates is used by agencies to fill specific target position vacancies. Officials in only one agency perform additional job element analyses of the applicant on the lists. Two agencies merely conduct unstructured interviews with the applicants and the other agency had no program participants. Some agency officials expressed dissatisfaction with the results of the selection process. They stated that:

- Qualified employees may not be adequately considered.
- Evaluation rankings appear to have little relationship to the relative abilities of the applicants ranked.
- Instances of candidates with questionable abilities being selected have occurred.

EVALUATION OF PARTICIPANTS

While the condition of the records made it difficult to determine when and if evaluations were due, it appears that many required training evaluations have not been made.

Department guidance requires that written evaluations on all participants be completed quarterly by first line supervisors and forwarded to the Office of Personnel. Of the 50 participants' files we reviewed, 38 had at least one evaluation missing and 14 had as many as five evaluations missing. Other upward mobility files relating to the programs also appeared incomplete and inaccurate. Also, five files showed evaluations recorded after the dates on which the participants had completed the programs.

CONCLUSIONS AND RECOMMENDATIONS

The Department has established selection and evaluation procedures for participants. However, these procedures have not been implemented in accordance with the specific requirements of the training guidelines.

We recommend that the Secretary of Agriculture require appropriate program officials to:

- Limit the application of the job element approach to the specific target position level as described in the Department's training guidelines.
- Implement procedures to provide that evaluations of program participants are prepared and submitted as required.

NEED TO STUDY INCREASED USE OF JOB
RESTRUCTURING TO CREATE ADDITIONAL
TECHNICIAN POSITIONS

According to the Civil Service Commission, job restructuring is an integral part of an upward mobility program. It can be used to segregate clerical and technical duties from professional positions and to establish support positions. This enables management to more effectively use their professionals and also provides increased upward mobility opportunities for lower level employees. Technician-type or "bridge" jobs are developed through job restructuring.

The Department of Agriculture has long recognized the use of job restructuring for technician positions in achieving upward mobility objectives. In the Department's August 1973 Upward Mobility program guidance, the application of job restructuring techniques is supported as a means to achieve the job placement objectives of the program. In the Operation Upgrade and Career Opportunities programs (which became the Job Opportunities and Skills Training program), job restructuring techniques are noted as a method by which placements are made.

Although the Department recognizes the values of job restructuring, opportunities to substantially increase its use to create additional technician positions may exist.

As part of the Department's 1974 Equal Employment Opportunity (EEO) effort, a review was made of each agency's use of technician positions. These positions were identified as a means for upward movement of lower graded employees. The staffing patterns of each agency were reviewed to determine the ratio of professional to technician positions and to identify areas where technician positions did not exist. Recommendations on increased use of technician positions were made to eight agencies which were required to study the possibility of increasing use of the positions identified, and to report on progress made in their next EEO progress report.

Agency responses to this study have been minimal. None of the eight agencies included a status report on their activities in subsequent progress reports. While the Department's fiscal year 1976 EEO report states that agencies are taking actions on an ad hoc basis, officials in three agencies we reviewed were unable to provide information which would indicate that studies of these recommendations had been made.

In addition, use of the identified technician positions in the Career Opportunities and Operation Upgrade programs was minimal. Of the 67 bridge and 68 target jobs used by the eight agencies in these programs, only 9 bridge positions and 6 target positions came from the technician series identified in the EEO report. Also, several of these agencies did not meet their goals for program participation.

CONCLUSIONS AND RECOMMENDATIONS

The Department has long recognized the importance of job restructuring in support of upward mobility program objectives. However, a recent study which recommended increased use of specific technician series offering upward movement opportunities has been generally ignored, even though several agencies have fallen short of their upward mobility position goals.

We recommend that the Secretary of Agriculture:

- Require appropriate program officials to direct agencies to study the feasibility of using more technicians to provide additional upward mobility opportunities. Additional technician positions may be created through job restructuring techniques.
- Establish specific target dates for completion of these studies.

NEED TO STRENGTHEN COST REPORTINGPROCEDURES FOR UPWARD MOBILITY ACTIVITIES

Each year, agency Equal Employment Opportunity officials are required by Office of Management and Budget Circular A-11 to report to the Civil Service Commission expenditures for internal EEO programs, including upward mobility. The circular requires that the report include a concise description of the program, significant cost effectiveness or other analytic findings, pertinent comments concerning the reliability of the data, and actions planned to improve data collection.

According to Department of Agriculture officials, the reliability of upward mobility cost information has never been included in the A-11 submission to CSC. Agency officials with A-11 cost collection responsibilities stated that this data is generally gathered informally and as a result is very unreliable. Weak EEO/budget office coordination was cited in several instances where cost reporting problems have occurred.

None of the agencies reviewed could provide backup documentation to support the amounts reported. One agency that participates in the Department's Upward Mobility program, and also has its own upward mobility program, has never reported upward mobility costs in its submissions. At a second agency, an official stated that administrative costs were in the reported upward mobility costs one year but excluded in another. Officials in the two other agencies advised us that their reported costs were based on rough estimates and were unreliable. However, none of these agencies have reported problems in the reliability of the reported upward mobility costs in their A-11 reports to the Department.

Although CSC guidelines state that upward mobility costs should be prepared jointly by the EEO office and the budget office, several agency officials informed us that this relationship is weak in the Department. For example, for one agency neither the responsible EEO official nor the Office of Management and Finance official participated in developing the upward mobility cost; both said it was the other's responsibility. This resulted in no cost being reported, even though the agency had an active upward mobility program.

In another agency, the responsible EEO official said that coordination with the Office of Management and Finance on upward mobility costs had consisted of a phone call. The official said that she was uncertain of the cost elements required in the A-11 submission even though she had reporting responsibilities. Consequently, inconsistent reporting of program administrative costs resulted.

CONCLUSIONS AND RECOMMENDATIONS

Upward mobility cost information being reported in A-11 cost submissions is generally unreliable, yet this information has not been reported to CSC as required.

We recommend, therefore, that the Secretary of Agriculture require appropriate program officials to:

- Strengthen collecting and reporting procedures.
- Report to CSC reliability problems the Department may be having in gathering and reporting upward mobility costs.
- Strengthen coordination between EEO officials and the Office of Management and Finance in reporting A-11 costs.