

United States General Accounting Office Report to the Chairman, Select Committee on Aging, House of Representatives

January 1989

SOCIAL SECURITY ADMINISTRATION

Employment of and Service to Hispanics





GAO/HRD-89-35

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GAO

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Human Resources Division

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January 30, 1989

The Honorable Edward R. Roybal Chairman, Select Committee on Aging House of Representatives

Dear Mr. Chairman:

In your October 22, 1987, letter you asked about the Social Security Administration's (SSA's) hiring of Hispanics and service to Hispanic clients. You expressed concern over the findings in two of our earlier reports dealing with equal employment opportunity (EEO) issues regarding blacks in SSA's headquarters and Hispanics in SSA's Region IX.¹ You questioned whether SSA was complying with guidelines of the Equal Employment Opportunity Commission (EEOC) in its hiring of Hispanics nationwide. You noted that some SSA field offices in California, a state in SSA Region IX, did not have enough printed material in Spanish. And you also questioned whether SSA had enough employees who speak fluent Spanish to deal effectively and efficiently with Hispanics.

On the basis of your letter and subsequent discussions with your office, we agreed to

- assess SSA's employment of Hispanics, particularly in field offices and in job series that primarily serve the public;
- compare SSA's employment of Hispanics with rates of availability of Hispanics in the civilian labor force (CLF);
- determine the number of Spanish-speaking employees at SSA;
- identify the extent to which SSA attempts to evaluate its service delivery to clients who are Hispanic, Spanish speaking, or both;
- determine the extent and costs of SSA program materials published in Spanish; and
- follow up on SSA's actions on recommendations in our earlier report on Hispanics' advancement opportunities in SSA Region IX.

We agreed with your office to carry out fieldwork in selected SSA offices in California and to use the information gathered during this effort to supplement nationwide data on SSA Hispanic employees and clients. In responding to your concerns, we visited SSA headquarters in Baltimore; SSA Region IX offices in San Francisco; and California district offices in

¹Affirmative Action: Social Security Can Do More to Improve Blacks' Representation in Its Work <u>Force (GAO/HRD-87-2, Jan. 2, 1987)</u> and Equal Employment Opportunity: Hispanics' Advancement <u>Opportunities in SSA Region IX</u> (GAO/HRD-87-82, July 30, 1987).

Chuła Vista, El Centro, Los Angeles, Montebello, San Diego, San Jose, and Whittier, as well as selected branch offices within these districts.

At each of these offices, we interviewed SSA officials concerning the hiring of Hispanics and Spanish-speaking people, evaluations of SSA service, and the type and quantity of SSA printed materials in Spanish. We also reviewed work force profiles, reports of quality-of-service surveys, job descriptions, and procedural manuals for certification of bilingual abilities, and bilingual hiring.

We reviewed EEOC and Department of Health and Human Services (HHS) instructions relating to affirmative employment program planning and reporting.² We also determined the status of SSA's fiscal years 1988-92 affirmative employment plans (AEPs); these are the strategies or initiatives planned to help alleviate the shortfalls in minority staffing in an agency.

Our findings relating to these objectives are summarized below and discussed in more detail in appendix I.

SSA, the largest organizational unit of HHS, administers the Old Age, Survivors, and Disability Insurance (OASDI) program, which provides monthly retirement and disability benefits, and the Supplemental Security Income (SSI) program, which provides benefits for the needy, aged, blind, and disabled. SSA operations include a headquarters complex with offices in the Baltimore metropolitan area and Arlington (Virginia), as well as a nationwide field organization. This consists of 10 regional offices, 75 area offices, 7 program service centers, 3 data operations centers, 34 teleservice centers, and over 1,300 district and branch offices. As of September 30, 1987, SSA employed 68,418 people.

Like most other federal agencies, SSA is required by law to design and implement an affirmative employment program. EEOC is the federal agency responsible for monitoring federal affirmative employment programs. In 1981 and 1987, EEOC directed HHS to (1) develop 5-year AEPS and (2) establish both long-term and annual hiring goals for job series

Background

²Federal affirmative employment programs are intended to overcome the lingering effects of historical discrimination, as shown by a lower rate of employment for a specific minority group in a federal agency's work force when compared with the rate of availability for the group in the CLF. EEOC instructions allow, but do not require, the establishment of numerical employment goals when a minority group's employment is below the CLF.

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	and grade bands in which minority groups were underrepresented. EEOC requires that minority group data be compiled according to sex.
	EEOC requires that federal agencies as a whole, such as HHS, and their major components (for example, SSA) compare each minority group's rate of employment in specific agency employment categories (that is, job series and grade levels) with each group's rate of availability in the appropriate CLF—the national, regional, or local labor force from which an agency recruits to fill specific positions. Agencies may need to initiate actions for recruitment and analysis of barriers to minority employment and promotion when the minority group's rate of employment within an agency or agency component divided by the appropriate CLF rate is sig- nificantly less than 100 percent. EEOC publishes statistics on the CLF availability of minority groups that agencies are required to use in com- paring rates. The statistics cover professional, administrative, clerical, technical, and all other job categories combined. Also, national and regional rates of availability are given in CLF for minority groups, including separate rates for men and women. EEOC publishes national CLF availability rates that combine all job categories, but it publishes regional availability rates for individual job categories.
Results in Brief	
Hispanic Employees in SSA	As of September 30, 1987, SSA's overall rate of employment of Hispanics was 6.4 percent, which equaled the national rate of availability of His- panics in CLF. But SSA's rate of employment of Hispanic men (1.6 per- cent) was less than their rate of availability in CLF (3.9 percent). SSA's rate of employment of Hispanic women (4.7 percent) exceeded their rate of availability in CLF (2.5 percent) (see pp. 15 and 16).
	Nearly 70 percent of the Hispanics at SSA were employed in three civil service job series: (1) series 105, social insurance administration (includes administrative positions); (2) series 962, contact representative (includes technical positions); and (3) series 998, claims clerical (includes clerical positions). People in these series primarily work with the public in SSA district and branch offices, providing information and assisting in initiating and processing benefit claims.
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ssa's overall rates of employment of Hispanics in these series exceeded national CLF availability rates. However, ssa's overall rates of employment of Hispanic men in the contact representative and claims clerical job series were less than CLF availability rates for similar jobs (see pp. 16-19).

In some grades in the social insurance administration, contact representative, and claims clerical job series, SSA regional employment of Hispanic men was slightly below regional CLF availability rates. In most regions where Hispanic men were not fully represented, there would be no underrepresentation if from one to six additional Hispanic men were employed in a job series.

As of September 30, 1987, SSA regional offices employed 19,673 men and women in the social insurance administration series, 7,248 in the contact representative series, and 6,553 in the claims clerical series. To eliminate underrepresentation, in total, SSA regions would have to hire these Hispanic employees: 47 men and 3 women in the social insurance administration series, 41 men and 10 women in the contact representative series, and 45 men and 1 woman in the claims clerical series. Much of the total SSA regional office underrepresentation could be remedied if Hispanic men in the Atlanta (Region IV) office reached full representation. For example, Atlanta needed 21 more Hispanic men in the social insurance administration series, 13 more in the contact representative series, and 18 more in the claims clerical series, to reach CLF availability rates (see pp. 19-20).

SSA noted in its June 16, 1988, instructions to all its organizational units on preparation of their 5-year AEPs that the employment of minority men has continually been less than CLF availability rates. SSA directed all units to address this underrepresentation in their AEPs.

According to SSA officials in the Office of Civil Rights and Equal Opportunity, development of the AEP has been delayed because SSA lacked work force data that accurately recorded the SSA organizational units in which people work. These data are necessary for comparing SSA minority employment with minority availability in CLF. The data were inaccurate, SSA officials said, because changes in organization codes after some SSA reorganizations had not been made on all employees' records in SSA's computerized personnel records.

SSA prepared its 5-year AEP and submitted it to HHS for review and approval in October 1988. As of December 14, 1988, the AEP had not

	been approved by HHS. Accordingly, we were not able to obtain a copy to determine whether SSA addressed the underrepresentation of Hispanics in the AEP.
Spanish-Speaking Employees in SSA	According to SSA records, as of January 1988, approximately 8.2 percent of all SSA field office employees were certified by SSA, through interview, as being Spanish speaking. The percentage of Spanish-speaking employ- ees ranged from a low of 2.7 percent in the Philadelphia region to a high of 15.6 percent in the San Francisco region. Approximately 9 percent of all field office employees in both the social insurance administration and contact representative series had Spanish-speaking ability, and 5.2 per- cent of field employees in the claims clerical series spoke Spanish.
	Regional and local officials determine the number of Spanish-speaking employees necessary to deal efficiently and effectively with Spanish- speaking clients who have limited ability to communicate in English. According to an SSA headquarters official, SSA does not track instances when SSA regions need to seek outside interpreter assistance because a Spanish-speaking employee was unavailable (see pp. 22-24).
	A May 27, 1988, internal SSA memorandum indicated that SSA offices in Chicago, Cleveland, Detroit, Milwaukee, and New York City have expe- rienced difficulties in hiring Spanish-English bilingual employees for the social insurance administration series. Because of this, the Office of Per- sonnel Management (OPM) has conducted special examinations open to candidates in these locations, and SSA offices are recruiting at local col- leges and universities to attract more Spanish-English bilingual candidates.
Materials Printed in Spanish	SSA publishes materials in Spanish, including information for general public distribution and notices sent to people about actions affecting their benefits. Most SSA public information is printed in Spanish and English, according to an official in SSA's Office of Information (see pp. 24-25). We were told that notices of benefit actions are sent out in Span- ish to OASDI and SSI recipients whose records have been annotated, indi- cating that notices should be sent to them in Spanish. Under the SSI program, people with annotated records receive all follow-up material in Spanish; under OASDI, only adverse notices (such as benefit denials, reductions, or terminations) using standard (nonindividualized) lan- guage are sent in Spanish (see pp. 26-27).

SSA Does Not Know How Many of Its Clients Are Hispanic	SSA does quality-of-service surveys na but does not collect information durin tify Spanish-speaking groups or any a know, therefore, how many Spanish- to communicate in English receive pr about prospective benefits, and need SSA programs and benefits.	ng these surveys to separately iden- racial or ethnic group. SSA does not speaking people with limited ability ogram benefits, make inquiries
	SSA does not believe it should develop ing services to particular client group of SSA, the agency "has a long tradition ments of the American public and people we serve equally and fairly all SSA clients, including Hispanics, re courteous service. Without collecting manner that identifies the race, ethni its clientele, however, SSA does not kn including Hispanics, are being served whole (see pp. 27-28).	os. According to the Commissioner on of equitable service to all seg- makes every attempt to treat all " The Commissioner believes that ceive professional, effective, and its service quality information in a city, and language preferences of now whether minority groups,
SSA Region IX's Implementation of GAO Recommendations	In our earlier report on Hispanics' ad Region IX, we recommended that SSA' an analysis of potential barriers to Hi (Los Angeles) of the region. SSA comp ary 1988, and concluded that no sign of Hispanics in area 7 exist, but empl 11 positions was below CLF availabilit a plan to address the disparity and w our review (see pp. 28-30).	's Region IX commissioner conduct ispanics' advancement in area 7 leted the barrier analysis in Janu- ificant barriers to the advancement oyment of Hispanic men in grade ty rates by three men. SSA prepared
Conclusions	SSA publishes most printed materials track of its employees who are biling not, however, compile racial, ethnic, a applicants and beneficiaries as part o Therefore, it does not know whether ics, are served at least as well as its c	ual in Spanish and English. SSA does and language preference data on f its quality-of-service surveys. minority groups, including Hispan-
v	In general, the employment profile of bly with the appropriate regional and series we reviewed. We noted, howeve represented in all job series in 7 of the	l national CLFs for the three job er, that Hispanic men are not fully
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	directed its organizational units to address the employment of Hispanic men in their AEPs. Therefore, we are not making any recommendations concerning this matter.
Agency Comments	We requested written comments on this report from HHS. Although we granted HHS an extension to the comment period, it did not provide writ- ten comments until significantly later than the extended date. There- fore, they have not been included in the report. The Department's comments did not take issue with the facts and positions presented in our report.
	Copies of this report are being sent to the Secretary of HHS, the Commis- sioner of SSA, the commissioner of SSA Region IX, and other interested parties. We will also make copies available to others on request. The major contributors to this report are listed in appendix IV. Sincerely yours, Linda G. Morra Associate Director

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	Abbreviations	

AEP	affirmative employment plan
CLF	civilian labor force
CPDF	central personnel data file
EEO	equal employment opportunity
EEOC	Equal Employment Opportunity Commission
GAO	General Accounting Office
HHS	Department of Health and Human Services
OASDI	Old Age, Survivors, and Disability Insurance
OPM	Office of Personnel Management
PACE	Professional Administrative Career Examination
SSA	Social Security Administration
SSI	Supplemental Security Income

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Appendix I

Social Security Administration: Employment of and Service to Hispanics

	In an October 22, 1987, letter and subsequent discussions with us, Representative Edward R. Roybal, Chairman of the House Select Committee on Aging, asked about the Social Security Administration's (ssa's) hiring of Hispanics and service to Hispanic clients. The Chairman expressed concern over the findings in two of our earlier reports dealing with equal employment opportunity (EEO) issues concerning blacks in ssa's head-quarters and Hispanics in SSA's Region IX. The Chairman questioned whether SSA, in hiring Hispanics nationwide, was complying with guide-lines of the Equal Employment Opportunity Commission (EEOC). He also noted that some offices in California, a state in SSA Region IX, did not have enough printed materials in Spanish. The Chairman also expressed concern about whether SSA had enough Spanish-speaking employees to deal effectively and efficiently with Hispanics.
Objectives, Scope, and Methodology	On the basis of the Chairman's letter and subsequent discussions with his office, we agreed to
	 analyze SSA work force data as of September 30, 1987, on the number of Hispanic employees by location, civil service job series, and grade; compare SSA's regional and national rates of employment of Hispanics in three civil service job series, 105 (social insurance administration), 962 (contact representative), and 998 (claims clerical), with national and regional civilian labor force (CLF) availability rates of Hispanics for administrative, technical, and clerical jobs; review SSA's employment of people with Spanish-speaking ability and certification of the Spanish language ability of these employees; determine the extent and cost of SSA's printing of materials—general public information and notices of benefit actions—in Spanish; identify the extent to which SSA attempts to evaluate its service to clients who are Hispanic, Spanish speaking, or both; and follow up on actions SSA had taken on recommendations in our earlier report related to Hispanic advancement opportunities in Region IX. We agreed with the Chairman's office to do field work in selected SSA offices in California and use the information obtained to supplement nationwide SSA data on Hispanic employees and clients. In addressing the Chairman's concerns, we visited SSA headquarters in Baltimore; SSA Region IX offices in San Francisco; and Region IX district offices in Chula Vista, El Centro, Montebello, Los Angeles, San Diego, San Jose, and Whittier, California, as well as selected branch offices within these districts.

· ,	Appendix I Social Security Administration: Employment of and Service to Hispanics
	At each of these offices we interviewed SSA officials about hiring His- panics and Spanish-speaking people, quality-of-service surveys, and printed materials in Spanish. Concerning certification of Spanish- speaking employees and hiring bilingual employees, we reviewed work force profiles, reports of quality-of-service surveys, job descriptions, and procedural manuals.
	We also reviewed pertinent instructions of EEOC and the Department of Health and Human Services (HHS) relating to affirmative employment planning and reporting. ¹ We determined the status of SSA's fiscal years 1988-92 affirmative employment plans (AEPS); these are the strategies or initiatives to help alleviate shortfalls in SSA as a whole and/or its organi- zational components.
	We did not assess the reliability of SSA's work force data or other docu- mentation provided by SSA. Except as noted, our work was done in accordance with generally accepted government auditing standards. We did our review from December 1987 to August 1988.
Background	In 1972, the Congress amended the Civil Rights Act of 1964 to require most federal agencies to maintain affirmative action programs that would ensure implementation of EEO policies. On January 2, 1979, in accordance with Reorganization Plan No. 1 of 1978, responsibility for overseeing federal EEO efforts was transferred from the Civil Service Commission, now the Office of Personnel Management (OPM), to EEOC, making it the principal agency for equal employment opportunity enforcement. EEOC provides affirmative action guidance, monitors the hiring and promotion of minorities, and oversees the discrimination com- plaint processes for both the public and private sectors.
	SSA, like other federal agencies, is required by law to design and imple- ment such programs. In 1981 and 1987, EEOC directed HHS to (1) develop 5-year AEPs and (2) when necessary, establish both long-term and annual hiring goals. The hiring goals were to be established for a 5-year cycle and were aimed at eliminating underrepresentation for each minority group. EEOC requires that minority group data be compiled
~	¹ Federal affirmative employment programs are intended to overcome the lingering effects of histori- cal discrimination, as shown by a lower rate of employment for a specific minority group in a federal agency's work force when compared with the rate of availability for the group in the CLF. EEOC instructions allow, but do not require, the establishment of numerical employment goals when a minority group's employment is below the CLF.

according to sex. Annually, EEOC requires HHS to provide an updated plan and accomplishment report.

In addition, EEOC requires that federal agencies as a whole and their major organizational units compare each minority group's rate of employment in specific employment categories (job series and grade levels) with each group's rate of availability in the appropriate CLF—the national, regional, or local labor force from which an agency recruits to fill specific positions. When the minority group's rate of employment within an agency or organizational unit divided by the appropriate CLF rate is significantly less than 100 percent, agencies may need to initiate actions for recruitment and analysis of barriers to minority employment and promotion. HHS instructions require that numerical EEO objectives be established when minority employment in specific categories is less than 21 percent of CLF availability. When minority employment is 21 to 50 percent of CLF availability, HHS instructions encourage numerical objectives.

So that agencies can compare minority employment with CLF availability, EEOC publishes statistics on the CLF availability of minority groups. For professional, administrative, clerical, technical, and all other job categories combined, the statistics (1) describe employees and people seeking work and (2) include national and regional rates of availability in CLF for minority groups and men and women. The CLF statistics do not distinguish salary levels within job categories. EEOC publishes national CLF availability rates that combine all job categories, but it publishes regional availability rates only for individual job categories.

The CLF data EEOC published were derived by EEOC from 1980 census data. EEOC matched each of the approximately 420 federal job series with appropriate counterpart nonfederal job categories. Every federal series was matched with one or more nonfederal job categories. Some nonfederal occupations were matched with more than one federal series, but not all nonfederal job categories were matched with a federal job series because there are some job categories in the nonfederal sector for which there are no federal job series. The census data are weighted to reflect the job mix of the federal government.

In June 1986, EEOC directed federal agencies to extend their 5-year AEPs for 1982-86 and continue their related affirmative action activities through September 30, 1987. On October 6, 1987, EEOC issued a directive, which included instructions for agencies to develop and submit a 5-year AEP for fiscal years 1988-92. This directive, superseding earlier

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	EEOC directives dealing with affirmative action planning and reporting, instructed agencies to begin, on a staggered basis, submitting their 5-year AEPs and requirements to EEOC on February 15, 1988.
	In the directive, the term "affirmative employment" replaced "affirma- tive action," which had been used in earlier directives; the terms "mani- fest imbalance" and "conspicuous absence" were used instead of "underrepresentation," which had been used to indicate employment rates below CLF availability rates. Manifest imbalance is defined in EEOC's October 6, 1987, directive as representation of minority groups in a specific occupational grouping or grade level that is substantially below its representation in the appropriate CLF. Conspicuous absence is defined as a particular minority group that is nearly or totally nonexis- tent from a particular occupation or grade level in the work force. EEO instructions allow, but do not require, establishment of numerical goals when either manifest imbalance or conspicuous absence exists.
•	Additional guidance and a sample plan were furnished by EEOC to fed- eral agencies in January 1988. At that time HHS was directed to submit its 5-year AEPs on April 15, 1988. In related instructions to its compo- nents, HHS defined conspicuous absence to exist when a minority group's rate of employment is less than 21 percent of CLF availability. In such instances, numerical employment objectives are required. Manifest imbalance is defined in HHS instructions to exist when a minority group's employment is 21 to 50 percent of the appropriate CLF. In these instances, numerical objectives are not required, but encouraged. On March 25, 1988, HHS issued instructions to its organizational units con- cerning preparation of their 5-year AEPs.
	SSA prepared its 5-year AEP and submitted it to HHS for review and approval in October 1988. As of December 14, 1988, the AEP had not been approved by HHS. Consequently, we were not able to obtain a copy to determine whether SSA addressed the underrepresentation of Hispan- ics in the AEP.
Social Security Administration	SSA administers a national program of social insurance. SSA programs include Old Age, Survivors, and Disability Insurance (OASDI), which pro- vides monthly retirement and disability benefits, and Supplemental Security Income (SSI), which provides benefits for the aged, blind, and disabled.

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SSA operations include (1) a headquarters complex with offices in the Baltimore metropolitan area and Arlington (Virginia) and (2) a nationwide field organization. This consists of 10 regional offices, 75 area offices, 7 program service centers, 3 data operations centers, 34 teleservice centers, and over 1,300 district and branch offices.

As of September 30, 1987, SSA employed 68,418 people. Approximately 17,000 SSA employees worked at the three data operations centers, seven program service centers, and 133 Offices of Hearings and Appeals nationwide and in Arlington. About 15,000 worked at SSA headquarters in Baltimore. The remaining people, about 36,000, worked in SSA's regional, area, district, and branch offices, and teleservice centers.

SSA's district and branch offices and teleservice centers serve as the primary contact points between SSA and the public. These offices and centers (1) receive and process claims and claims actions and (2) provide advice and information to people wishing to file claims or seeking information about their claims.

Of all SSA district and branch office employees, 91 percent are employed in three civil service job series: (1) social insurance administration, (2) contact representative, and (3) claims clerical. Employees in these job series primarily work with the public by providing information and assisting in initiating and processing benefit claims. More specifically they (1) review applications for benefits, (2) develop claims for benefits, (3) receive notifications of actions that require benefit adjustments, and (4) review and verify claims data and claims actions.

The civil service career ladder for the social insurance administration job series includes grades 5 through 12; for the contact representative series, grades 4 through 7; and for the claims clerical series, grades 2 through 7. The claims clerical series includes bridge positions, offering qualifying general experience for the contact representative series at grades 4 or 5. A bridge position is paraprofessional in nature, allowing employees to move from clerical to professional career paths after gaining the requisite experience. Employees in the contact representative and claims clerical series may compete for the social insurance administration series. Employees in the social administration series are eligible for placement in most SSA program-related positions. In comparing federal work force statistics with CLF statistics, the social insurance administration series is considered comparable with administrative jobs, the contact representative series with technical jobs, and the claims clerical series with clerical jobs.

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His	panic	Employees
in S	SA	

SSA's overall 6.4-percent rate of employment of Hispanics, as of September 30, 1987, equaled the CLF national rate of availability of Hispanics. As of that date, SSA employed 4,346 Hispanics nationwide—1,123 men and 3,223 women. As shown in table I.1, SSA's national rate of employment of Hispanic women exceeded their national rate of availability in CLF, but SSA's rate of employment of Hispanic men was less than their national rate of availability in CLF.

Table I.1: Hispanic Employees in SSA Compared With CLF Availability (Sept. 30, 1987)

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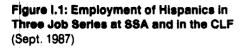
Gender	SSA work force	CLF availability
Women	4.7	2.5
Men	1.6	3.9
Total	6.4*	6.4

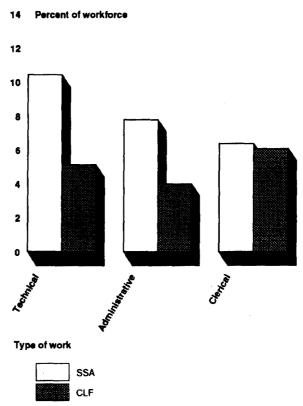
^aFigures do not add due to rounding.

Nearly 70 percent of SSA's Hispanics were employed in the social insurance administration, contact representative, and claims clerical job series. As shown in figure I.1, SSA's overall rates of employment of Hispanics in these series exceeded their national CLF availability rates.

To determine the relative representation of Hispanics in various job series, we used CLF data that EEOC developed. EEOC uses these data to compare an agency's rate of minority employment for each job series with the overall rate of minority employment in CLF. EEOC requires agencies and their organizational units, however, to monitor minority representation in each job series by grade band. In this report, therefore, we compared the EEOC data on the number of Hispanic men and women in CLF with the number of Hispanic men and women employed by SSA in various grade bands in the social insurance administration, contact representative, and claims clerical job series.

When compared by sex, as shown in table I.2, ssA's rates of employment of Hispanic men in the contact representative and claims clerical job series were less than CLF availability rates for similar jobs.





Note: Technical work includes the contact representative (962) job series, administrative work includes social insurance administration (105) job series, and clerical work includes claims clerical (998) job series.

Table I.2: SSA Employment of HispanicMen and Women in Three Job SeriesCompared With CLF (Sept. 30, 1987)

	Hispanic r	nen	Hispanic women	
Job series: name and number	SSA	CLF	SSA	CLF
Social insurance administration (105)	3.0	2.8	4.6	1.3
Contact representative (962)	[2.0]ª	2.7	8.4	2.4
Claims clerical (998)	[0.7] ^a	1.9	5.7	4.2

^aBrackets indicate the SSA employment rate was less than the CLF availability rate.

When compared by grade band in addition to sex, as shown in figure I.2, SSA's rates of employment of Hispanic men in the contact representative series for grades 5-8 and 9-12 were less than the national CLF. SSA's rates of employment of Hispanic women in this series exceeded, at all grade

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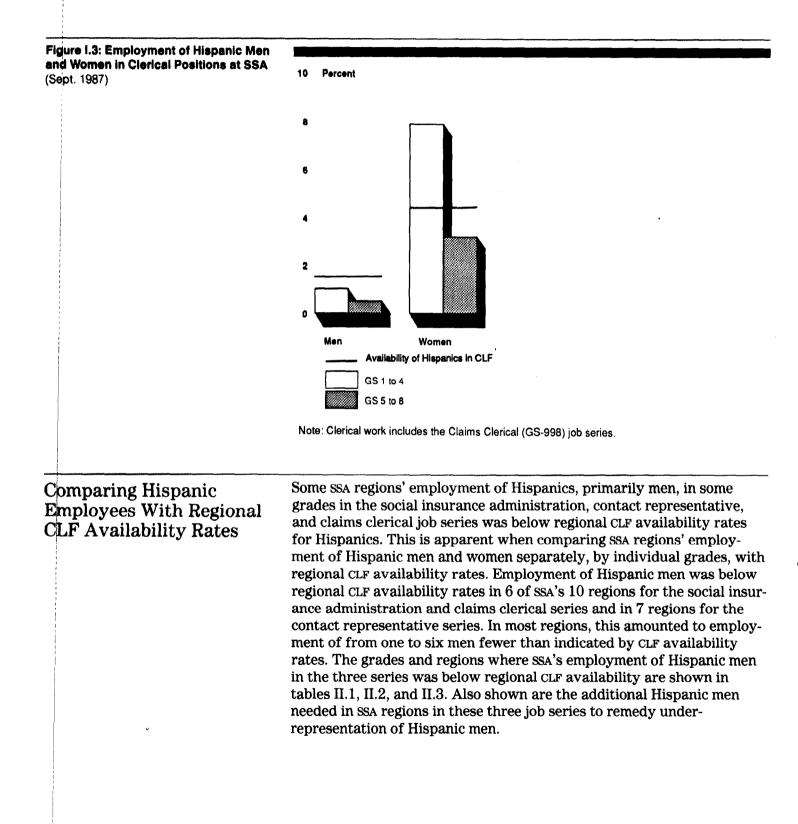
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Appendix I Social Security Administration: **Employment of and Service to Hispanics** bands, the national CLF availability rate of Hispanic women for technical jobs. Figure I.2: Employment of Hispanic Men and Women in Technical Positions at 20 Percent **SSA** (Sept. 1987) 15 10 5 ۵ Men Women Availability of Hispanics in CLF GS1 to4 GS 5 to 8 GS 9 to 12

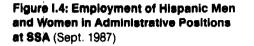
Note: Technical work includes the Contact Representative (GS-962) job series.

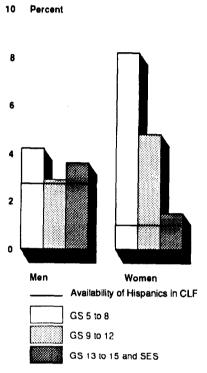
As shown in figure I.3, in grades 5-8 in the claims clerical job series, SSA's rates of employment of both Hispanic men and women were less than the national CLF availability rates for clerical jobs. At grades 1-4 in this series, SSA's rate of employment of Hispanic men was less than the CLF availability rate, and employment rates of Hispanic women exceeded CLF.

SSA's rates of employment of Hispanic men and women at all grade bands in the social insurance administration job series exceeded national CLF availability rates of Hispanic men and women for administrative jobs, as shown in figure I.4.



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Much of the total SSA regional office underrepresentation could be remedied if the Atlanta (Region IV) office reached full representation of Hispanic men. To eliminate underrepresentation, Atlanta (Region IV) and Dallas (Region VI) each would need to hire approximately 12 additional Hispanic men in grades 5 to 7 in the contact representative series. In Atlanta, the additional Hispanics are needed in grades 6 and 7, in addition to the total 1,210 employed at those grades as of September 30, 1987. In Dallas, the additional men are needed at grades 5 and 7, in addition to the total 661 employed at those grades as of September 30, 1987. SSA's Atlanta region would also have to hire an additional 21 Hispanic men at grades 10, 12, and 13 in the social insurance administration series and 18 men at grades 4 and 7 in the claims clerical series. This would be in addition to the total 2,536 men and women employed at grades 10, 12, and 13 in the social insurance administration series and

	Appendix I Social Security Administration: Employment of and Service to Hispanics	
	1,187 at grades 4 and 7 in the claims clerical series, as of September 3 1987.	30,
	In total, SSA regions would have to hire 47 Hispanic men in the social insurance administration series, 41 in the contact representative series and 45 in the claims clerical series to eliminate underrepresentation. If September 30, 1987, SSA regional offices employed 19,673 men and women in the social administration series, 7,248 in the contact representative series, and 6,553 in the claims clerical series. SSA regional rates employment for Hispanic women were lower than indicated by comparable CLF rates in 3 of the 10 SSA regions, with a total of 3 fewer in the social insurance administration series, 1 in the contact representative series, and 10 in the claims clerical series.	As en- of ar-
	In seven regions, SSA's employment of Hispanic men was less than 21 percent of the number of men indicated by CLF availability rates for a least one grade level of a job series. HHS instructions require that num cal EEO goals be established in such instances and encourage the establishment of numerical goals when employment is 21 to 50 percent less than the number of people indicated by CLF rates.	eri-)-
Region IX: Hispanic Employees	SSA's Region IX employed 5,527 people as of September 30, 1987. Hispanics made up 18.3 percent—13 percent women and 5.3 percent men (1,011) of the total employees. Region IX's employment of Hispanic m in the contact representative and claims clerical job series was below regional CLF availability rates for technical and clerical jobs. As shown in tables II.1, II.2, and II.3, Region IX's employment of Hispanic men v below CLF availability by one position at grade 5 and two positions at grade 6 in the contact representative series. Region IX was also below CLF availability by seven positions at grade 4 and four positions at grade 7 in the claims clerical job series. Region IX's employment of Hispanic women in the social insurance administration and claims clerical series equaled or exceeded regional CLF availability rates for administrative and clerical jobs. The region's employment of Hispanic women in the contact vertex was below the regional CLF availability rates for administrative for technical jobs by one position.	n n was ade
SSA's Limited External Hiring	During the 1980's, budgetary constraints, ceiling limits, and less staff turnover have restricted SSA's external hiring. In February 1982, SSA announced a plan to gradually reduce its work force. In April 1985, SS estimated that by September 1990, it would reduce its nationwide wor	A
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	force by 17,000 full-time equivalent positions. ssA based the reduction on efficiencies from planned procedural changes and the modernization of automatic data processing operations.
	In recent years, SSA's external hiring has been limited to entry-level cleri- cal and technical positions and hard-to-fill positions. As a result, to bet- ter balance the representation of minorities among grade levels within mainstream job series (the job series with the most employees and the most opportunities for advancement), SSA's affirmative employment strategies have focused mainly on internal movement (promotions and reassignments) of staff.
Hiring of Hispanic Men	On June 16, 1988, when SSA issued instructions concerning preparation of 5-year AEPs, it noted that the employment of men in all minority groups has continually been less than CLF availability rates. SSA directed all organizational units and regions to address these groups in their AEPS.
	We discussed employment of Hispanic men with representatives of SSA's Office of Civil Rights and Equal Opportunity in the Philadelphia (Region III), Atlanta (Region IV), Chicago (Region V), and Dallas (Region VI) offices. All the representatives recognized that employment of Hispanic men was below CLF availability rates. Employment of men in most minority groups in Dallas was less than CLF availability rates, according to the representative. In Atlanta, recruiting men is difficult because men are reluctant to work in clerical jobs and SSA jobs are mostly clerical, the SSA representative said. Because of work-force reductions, Atlanta, Dallas, and Philadelphia civil rights and equal opportunity representatives noted, SSA would not be able to hire many new employees in the near future.
	As contributing factors to the low employment rates of minority men, SSA officials have also previously cited the clerical nature of SSA's work and the relatively low grades of entry-level positions in SSA's work force. This occurs primarily at two points—clerical jobs at grades 2 and 3 and technical or professional jobs at grades 5 and 7. According to SSA, histor- ically, the applicant pool for such positions has been dominated by women.

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Status of SSA's 1988-92 AEP	According to officials of SSA's Office of Civil Rights and Equal Opportu- nity at SSA headquarters, development of SSA's 5-year AEP was delayed because accurate central personnel data file (CPDF) work-force data were lacking. (The CPDF is OPM's automated data file, which includes informa- tion submitted by federal agencies on personnel actions.) Agencies are required to use CPDF data in developing their AEP for comparing minority groups' rates of employment in their agencies with the groups' rates of availability in CLF.
	CPDF data do not accurately reflect the SSA organizational units in which people work, SSA officials noted. After some reorganizations had occurred, related changes by employees had not been made in SSA's computerized personnel records.
	CPDF data were sent to SSA regions on June 28, 1988, reported an official of SSA's Office of Civil Rights and Equal Opportunity at SSA headquarters. The regions were expected to submit their AEPs by August 8, 1988. SSA's overall plan was to be submitted to HHS about the end of September, said this official on August 29, 1988. SSA submitted its 5-year AEP to HHS for review and approval in October 1988. As of December 14, 1988, the AEP had not been approved by HHS.
Spanish-Speaking Employees in SSA Work Force	According to SSA records, as of January 1988, through interviews approximately 8.2 percent of all field office staff were certified by SSA as Spanish speaking. The percentage of Spanish-speaking employees ranged from a low of 2.7 percent in the Philadelphia region to a high of 15.6 percent in the San Francisco region. Approximately 9 percent of all field office employees in both the contact representative and social insurance administration job series had Spanish-speaking ability, and 5.2 percent of field employees in the claims clerical series had this abil- ity. The number and percentage of Spanish-speaking field office staff certified in each of SSA's regions are shown in table III.1.
v	In the Region IX offices we visited, the percentages of Spanish-speaking staff in the three series ranged from a low of 6 percent in the Pacific Beach branch office of the San Diego district to a high of 89 percent in the El Sereno branch office of the Montebello district. The percentages of certified Spanish-speaking staff in these series for the district and branch offices in Region IX that we visited are shown in table III.2. According to SSA officials, Spanish interpreters (speakers) and transla- tors (those who translate documents) are available in 172 of the 182 Region IX field offices. Region IX has enough staff to handle Spanish

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	language translation and interpretation needs, reported the SSA regional commissioner. Region IX has never had to arrange for outside inter- preter services because an adequate number of Spanish-speaking employees are available, SSA officials told us.
	Management of language needs in SSA field offices is left to the discretion of regional and local officials. According to the SSA Region IX commis- sioner, SSA offices in areas with large Hispanic populations strive to have an adequate number of Spanish-speaking employees. The commis- sioner told us that although SSA has no systematic way to determine the number of Spanish-speaking employees that is needed, SSA is very con- cerned about productivity; regional and local offices' performance in various areas of service delivery is evaluated regularly. Each office does whatever is necessary to maintain peak productivity, including hiring staff to best serve non-English-speaking clients and applicants, as needed.
	SSA's policy for dealing with clients who are non-English speaking is to (1) ask the clients to bring someone to interpret for them—a bilingual family member, friend, or member of a local church, voluntary agency, or social group—or (2) use a bilingual employee when available. If none of these people are available, local field managers may help clients find an interpreter or procure interpreter services at SSA's expense. This policy applies to clients who come into an SSA office in person or call on the telephone to obtain information.
	An SSA headquarters official told us that SSA does not keep records of the regions' use of outside interpreter services.
Determining Bilingual Ability	Bilingual ability is defined by SSA as the ability to conduct Social Secur- ity program interviews and give advice in English and a second lan- guage. Employees may be certified as bilingual when bilingual ability is approved as a selective placement factor; that is, a qualification require- ment added to the minimum qualification standards prescribed by OPM for a given position. Establishing bilingual ability as a selective place- ment factor is left to the discretion of the individual personnel office, an SSA personnel office official told us. Notices of employees' bilingual certi- fication are to be entered in SSA's personnel data system.
v	Competence in the second language is evaluated in one of two ways. First, supervisors may certify to the bilingual competence of employees

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	ond, SSA or other federal age isters must participate in an language; candidates may, he view as well as an additional	Ind language in dealing with SSA's clients. Se ncy employees and candidates from OPM re- interview conducted partly in the second owever, instead participate in that inter- l one, conducted solely to determine the ca understand the language well enough to at factor requirement.	eg-
Bilingual Hiring	Bilingual/Bicultural Program insurance administration ser gram, agencies may directly priate OPM or agency-adminis Spanish language proficiency lic interaction or job perform positions covered by alternat fessional Administrative Car have to be selected in the ord positions covered by Schedul	has been able to use a special program, the n, for hiring Spanish bilinguals for the soci- ies at grade 5 and 7 levels. Under this pro- hire candidates (rated eligible in the appro- stered alternative examination) if they have y or knowledge of Hispanic culture and pu- hance would be enhanced by these skills. F- tive examinations, which replaced the Pro- reer Examination (PACE), candidates do not ler they appear on the list of eligibles. For le B Professional and Administrative Care indidates are grouped and considered sepa	ial - ve b- or
	Chicago, Cleveland, Detroit, I rienced difficulties in hiring insurance administration ser OPM has conducted special ex applying for these positions i	memorandum indicated that SSA offices in Milwaukee, and New York City have expe- bilingual claims representatives in the soci ies. Because of a shortage of candidates, caminations for the benefit of candidates in these cities. SSA offices are carrying out it local colleges and universities to attract	- ial
Materials Printed in Spanish	public distribution and notice affecting their benefits. SSA does not produce materia cial told us that a few years a Care Financing Administration	anish concerning information for general es sent to individual clients about actions I in different Spanish dialects. An SSA offi- ago a task force composed of SSA and Healt on employees developed a standard glos- s to be used by SSA personnel who meet an	th
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	interview Hispanics, prepare correspondence and other Spanish lan- guage documents, and develop public information materials. The glos- sary is intended to promote uniformity in language usage and avoid misinterpretation of Spanish language materials issued by SSA. All SSA Spanish language materials are translated by SSA staff.
Informational Material in Spanish	SSA recently revamped its public information program into four series, according to the deputy director of SSA's Office of Information. Series 1 includes general Social Security leaflets designed for use in responding to the most frequent inquiries from the general public and clients. Series 2 includes five program booklets; one about each of the four programs administered by SSA (retirement, survivors, disability, SSI) and one about Medicare. Series 3 includes single-issue fact sheets, each of which serves specialized audiences. Series 4 publications are about SSA administrative concerns.
	As of June 17, 1988, ssA printed in Spanish series 1 and 2, half of series 3, and most of series 4; the remainder of series 3 is specialized and distribution is expected to be too low to warrant translation into Spanish, according to the deputy chief of the editorial staff in the Office of Information.
	Other informational materials, according to the director, produced in Spanish include
	 a quarterly newsletter, <u>Información del Seguro Social</u>, distributed to about 300 Spanish groups and organizations interested in Social Security; a monthly package of draft informational materials (news releases, columns, questions and answers, and radio announcements) sent to 285 Social Security offices serving the Hispanic community and to local media; and the "Commissioner's Corner," a column under the byline of the Commissioner of Social Security, which is distributed to approximately 78 Hispanic newspapers around the country. In fiscal year 1988, SSA spent an estimated \$173,273 for information printed in Spanish, according to an official in the Office of Information. On the basis of past experience, field offices estimate the quantities of Spanish materials required for a 6-month period. The Office of Information also prints an equal amount as reserve stock, according to another official of this office.

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Region IX: Supply and Distribution of Information	In a study of SSA reception areas, conducted in May 1987 in Region IX, the Program Integrity Field Office of SSA found that the supply and vari- ety of public information in field offices, including materials printed in Spanish, were often inadequate. The study, however, did not make any recommendations to correct these problems.			
	According to the director of the Region IX Quality Branch, no recom- mendations were made to correct the inadequate supply of public infor- mation because SSA had recently updated such publications to include changes in the law and regulations and to eliminate redundancy. As a result, those offices that ran out of the outdated public information were not resupplied until the updated versions were printed. All offices in Region IX have received the updated versions and now, according to Region IX's Quality Branch director, have adequate supplies for the public, including information printed in Spanish.			
	According to the director, Region IX contracted with a private advertis- ing agency to improve the publicizing of its services to the community. The advertising agency, in conjunction with Region IX's External Affairs Branch, has designed a training package that includes classes and seminars on effective publicity in the community. This training package will be given to all Region IX field office managers, the director said.			
Notices of Benefit Actions in Spanish	SSA officials told us that notices of benefit actions are sent out in Spanish to OASDI and SSI recipients whose records have been so annotated. Under the SSI program, these people receive all follow-up material in Spanish; under OASDI, only adverse notices, such as benefit denials, reductions, or terminations, are sent in Spanish, according to SSA officials. Under the disability program, adverse notices sent in Spanish include a statement of the decision and of appeal rights; personalized notices explaining SSA decisions in individual disability cases are sent in English, with a note indicating that translation help is available from SSA, if needed. Under the Retirement Program, adverse notices sent in Spanish include a standard cover letter as well as a statement of appeal rights with a note indicating that translation help is available.			
v	SSA officials told us that unless a client notifies them to the contrary, SSA annotates records of recipients of OASDI and SSI benefits to indicate that notices of benefit actions should be sent in Spanish when any of the fol- lowing criteria are met:			

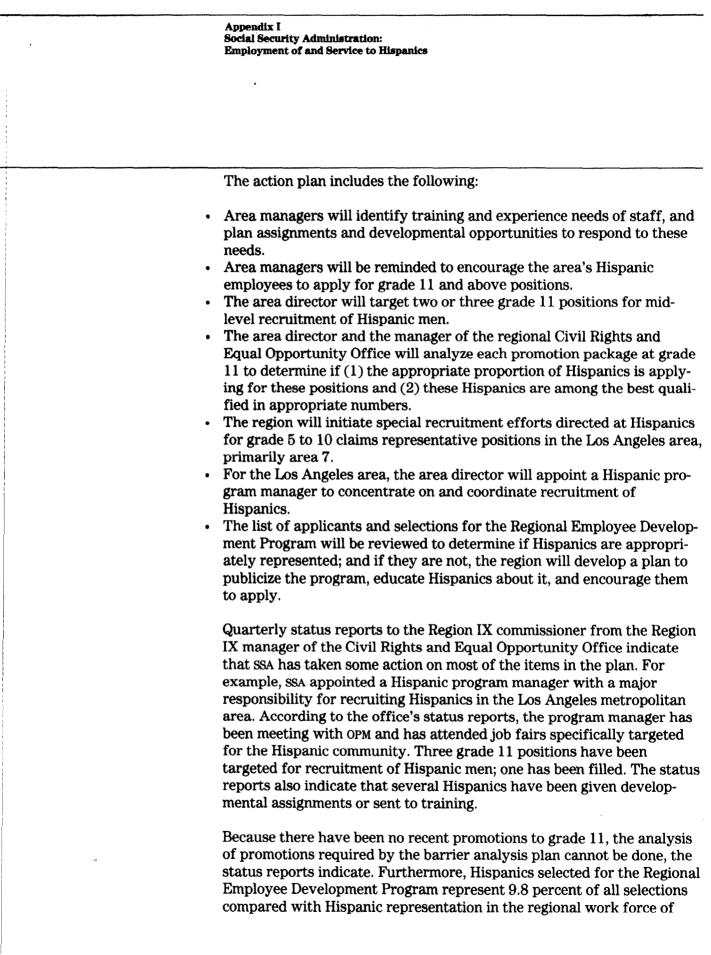
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•	the application shows the client was born in a country or territory where Spanish is the predominant language (for example, Mexico or Puerto Rico); the client has a Hispanic surname; the client lives in a known Spanish-speaking area (for example, "Little Havana" in Miami or East Los Angeles); an interview is conducted in Spanish or with the assistance of a Spanish interpreter; interactions indicate the client has difficulty speaking English, but is fluent in Spanish; or a client has requested that notices be in Spanish. SSA headquarters officials told us that records of approximately 3 per- cent (125,000) of clients receiving SSI have Spanish annotations, as do records of approximately 1.2 percent (428,446) of clients receiving OASDI. SSA estimates, based on Current Population Survey data, that in fiscal year 1985, the percentage of people of Spanish origin receiving OASDI was 3.4 percent (1.2 million) and SSI, 10.4 percent (421,200). According to SSA records, 8.1 percent of SSI recipients in six states with large Spanish-speaking populations—California, Colorado, Florida, Illi- nois, New York, and Texas—requested notices in Spanish. Of the SSI cli- ents in California, where Hispanics represent an estimated 22 percent of the total state population, 5.3 percent requested notices printed in Span- ish. SSA officials were unable to provide us with an estimate of annual expenditures for notices in Spanish.
Know Its ispanic	SSA does quality-of-service surveys nationally, regionally, and locally, but does not collect information during these surveys to separately identify Spanish-speaking groups or any other racial or ethnic group. SSA does not know how many Spanish-speaking people with limited ability to communicate in English receive benefits under its programs, make inquiries about prospective benefits, and need or request written material about SSA programs and benefits. SSA does not believe it should develop specific mechanisms for evaluating services to particular client groups. According to SSA's Commissioner, the agency "has a long tradition of equitable service to all segments of the American public and makes every attempt to treat all people we serve equally and fairly" The Commissioner believes that all SSA clients, including Hispanics, receive professional, effective, and courteous service.
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	In its fiscal year 1988 work plan for quality-of-service surveys, SSA tai- lored two studies to provide data about its service effectiveness. The surveys were of telephone service and ways to streamline responses to clients' questions and complaints regarding their benefits. No informa- tion is collected indicating the number of telephone inquiries received from Spanish-speaking people with limited ability to communicate in English or the extent to which SSA's post-benefit-determination workload concerns the benefits of such people. SSA's Region IX made several quality-of-service surveys in fiscal year 1987, including a reception area study, a teleservice center survey, and a public survey done by telephone. These surveys did not, however, col- lect information on how many people asking for printed materials or
	 making inquiries were Spanish speaking with limited ability to communicate in English. The Region IX commissioner indicated to us that ethnic data could be collected during quality-of-service surveys, but he did not feel that such data would be significant or beneficial in improving delivery of service to SSA clients because all clients are treated equally. Although SSA believes that all clients including Hispanics are receiving professional, effective, and courteous service, it does not collect racial, ethnic, and language preference data on its clientele. Therefore, SSA does not know for certain whether this is the case.
SSA Region IX's Implementation of GAO Recommendations	In our report on <u>Hispanics' Advancement Opportunities in SSA Region IX</u> (GAO/HRD-87-82, July 30, 1987), we recommended that SSA's Region IX commissioner conduct an analysis of potential barriers to Hispanics' advancement in area 7 of the region, which consists primarily of the Los Angeles area. SSA's Region IX office completed the barrier analysis in January 1988. In the analysis, SSA concluded that no significant barriers to the advancement of Hispanics in area 7 existed, but employment of Hispanic men in area 7 in some grade 11 positions (operations supervi- sor) was below CLF availability rates by three men. Therefore, SSA pre- pared a plan to address the disparity and otherwise maintain appropriate numbers of Hispanics. The analysis reported that Hispanics may be reluctant to apply for grade 11 positions because of the same factors that may inhibit all employees from applying; these are, job stress, limited mobility, high cost of living, and moving or commuting to a less desirable location.



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16.2 percent. A plan to improve minority representation in the Regional Employee Development Plan is being developed, reported the manager of the Region IX Civil Rights and Equal Opportunity Office.
SSA publishes most printed materials and notices in Spanish and keeps track of its employees who are bilingual in Spanish and English. ssA does not, however, compile racial, ethnic, and language preference data on applicants and beneficiaries as part of its quality-of-service surveys. Therefore, it does not know whether minority groups, including Hispan- ics, are served at least as well as its clientele as a whole.
In general, the employment profile of Hispanics in SSA compares favorably with the appropriate regional and national CLFs for the three job series we reviewed. Nevertheless, Hispanic men are not fully represented in all job series in 7 of the 10 SSA regional offices. SSA has directed its organizational units to address the employment of Hispanic men in their AEPs. Therefore, we are not making any recommendations at this time.
We requested written comments on this report from HHS. Although we granted HHS an extension to the comment period, it did not provide writ- ten comments until significantly later than the extended date. There- fore, they have not been included in the report. The Department's comments did not take issue with the facts and positions presented in our report.

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SSA Regional Employment Compared With Regional CLF Availability

 Table II.1: SSA Regional Employment of Hispanic Men Compared With Regional CLF Availability in the Social Insurance

 Administration (105) Job Series (Sept. 30, 1987)

				SSA employment of Hispanic men			
Region	Grade	Total SSA employees	Hispanic men available in CLF*	Number	Percent of CLF availability	Additional men needed to equal CLF ^b	
Atlanta	10 12 13	2,146 280 110	32.0 4.0 3.0	15 2 1	47 50 33	17.0 2.0 2.0	
Chicago	13	138	3.8	1	26	2.8	
Dallas	9 10 12	129 1,338 156	7.9 81.6 9.5	2 78 7	25 96 74	5.9 3.6 2.5	
Kansas	13	44	1.0	0	. 0	1.0	
Philadelphia	10 11 12 13 14	1,377 268 173 76 37	11.0 2.0 1.0 2.0 1.0	6 1 0 0 0	55 50 0 0 0	5.0 1.0 1.0 2.0 1.0	
Seattle	11	102	1.0	0	0	1.0	
Total						47.8	

^aDerived by multiplying the regional CLF availability rate for administrative jobs by the total number of men and women SSA employees for each grade.

^bSSA's regional office employment of Hispanic women in this series was below CLF availability rates by three positions: in Atlanta, one GS-12; in Chicago, one GS-12 and one GS-13.

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Appendix II SSA Regional Employment Compared With **Regional CLF** Availability

Table II.2: SSA Regional Employment of Hispanic Men Compared With Regional CLF Availability in the Contact Representative (962) Job Series (Sept. 30, 1987)

Region			Hispanic men available in CLF*	SSA employment of Hispanic men		
	Grade	SSA employees		Number	Percent of CLF availability	Additional men needed to equal CLF ^b
Atlanta	6 7	124 1,086	2.0 18.5	07	0 38	2.0 11.5
Boston	7	230	2.0	0	0	2.0
Chicago	7	1,111	8.8	4	45	4.9
Dallas	5 7	68 593	3.6 31.4	2 20	56 64	1.6 11.4
Denver	7	139	3.0	2	66	1.0
Philadelphia	7	625	3.8	1	26	2.8
San Francisco	5 6	65 104	3.4 5.5	2 3	59 55	1.5 2.5
Total				······································		41.2

^aDerived by multiplying the regional CLF availability rate for technical jobs by the total number of men and women SSA employees for each grade.

^bSSA's regional office employment of Hispanic women in this series was below CLF availability rates by one position, a GS-10 in San Francisco.

Table II.3: SSA Regional Employment of Hispanic Men Compared With Regional CLF Availability in the Claims Clerical (998) Job Series (Sept. 30, 1987)

Region	Grade	SSA employees	Hispanic men available in CLF*	SSA employment of Hispanic men		
				Number	Percent of CLF availability	Additional men needed to equal CLF ^b
Atlanta	4 7	760 427	13.7 7.7	2 0	15 0	11.7 7.7
Chicago	4 7	1,023 200	6.1 1.2	1 0	16 0	5.1 1.2
Dallas	7	223	6.5	0	0	6.5
Philadelphia	4	353	1.4	0	0	1.4
San Francisco	4 7	532 270	18.6 9.5	11 5	59 53	7.6 4.5
Total						45.7

^aDerived by multiplying the regional CLF availability rate for clerical jobs by the total number of men and women SSA employees for each grade.

^bSSA's regional office employment of Hispanic women in this series was below CLF availability rates by 10.8 positions; in Atlanta, 9 GS-7 positions, and in Chicago, 1.8 GS-7 positions.

Appendix III SSA Spanish-Speaking Employees

Table III.1: Spanish-Speaking Employees in SSA Regional Offices

	_	Spanish-speaking*		
SSA regional office	Staff ^b	Number	Percent	
Atlanta	6,295	334	5.3	
Boston	1,836	62	3.4	
Chicago	6,559	222	3.4	
Dallas	3,828	533	13.9	
Denver	1,010	64	6.3	
Kansas City	1,779	50	2.8	
Philadelphia	3,602	99	2.7	
New York	4,860	722	14.8	
Seattle	1,316	68	5.2	
San Francisco	5,527	861	15.6	
Total	36,612	3,015	8.2	

^aAs of January 29, 1988.

^bAs of September 30, 1987.

Appendix III SSA Spanish-Speaking Employees

Table III.2: Spanish-Speaking Employees in Three Job Series in Selected Region IX Offices (Feb.-Mar. 1988)

		Spanish-speaking		
District and branch office	Staff	Number	Percent	
San Diego	56	13	25	
Southeast	32	9	28	
Linda Vista	26	5	19	
Pacific Beach	16	1	6	
Total	130	28	22	
Whittier	39	20	51	
Norwalk	21	11	52	
Total	60	31	52	
Chula Vista	45	26	58	
El Centro	24	19	79	
Yuma	13	9	69	
Total	37	28	76	
Los Angeles	91	25	28	
Montebello	33	21	64	
Boyle Heights	24	21	88	
El Sereno	9	8	89	
Total	66	50	76	
San Jose	53	15	28	
Campbell	25	4	16	
South	21	2	10	
East	35	15	43	
Sunnyvale	22	3	14	
Palo Alto	12	2	17	
Total	168	41	24	

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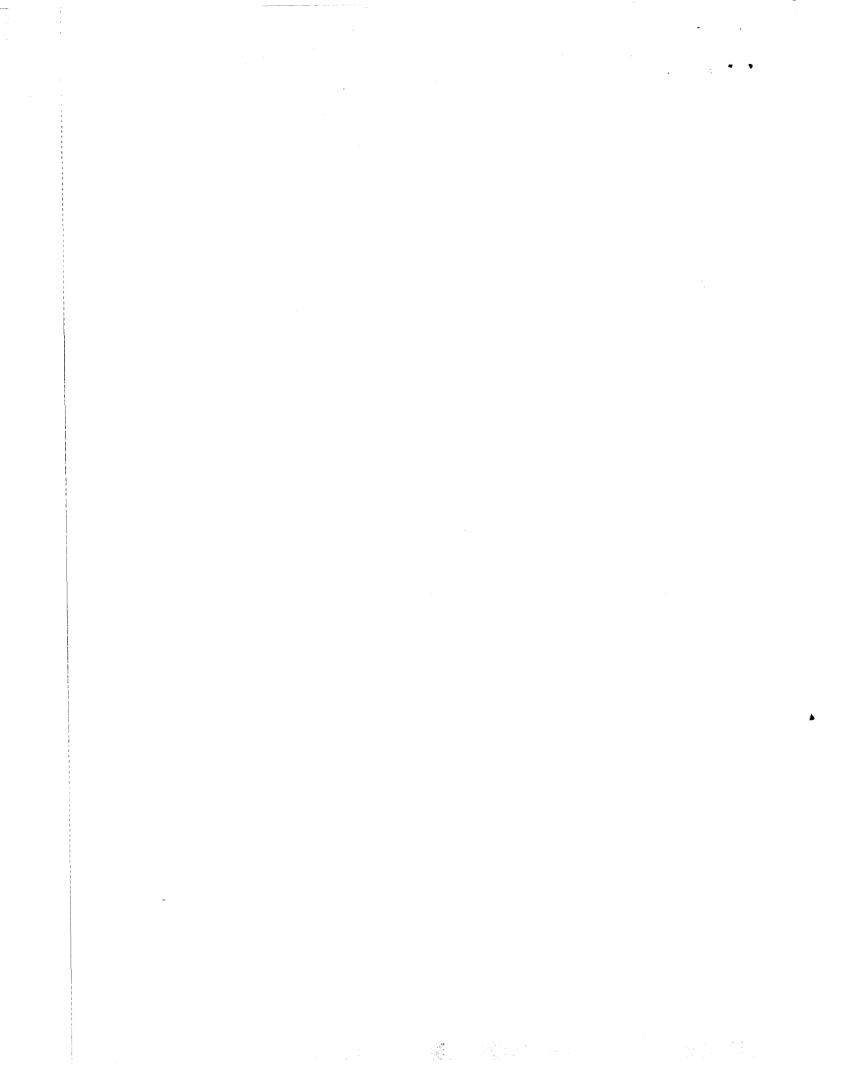
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Appendix IV Major Contributors to This Report

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