



United States General Accounting Office

Report to Congressional Requesters

July 1994

FEDERAL AFFIRMATIVE EMPLOYMENT

Better Guidance Needed for Small Agencies

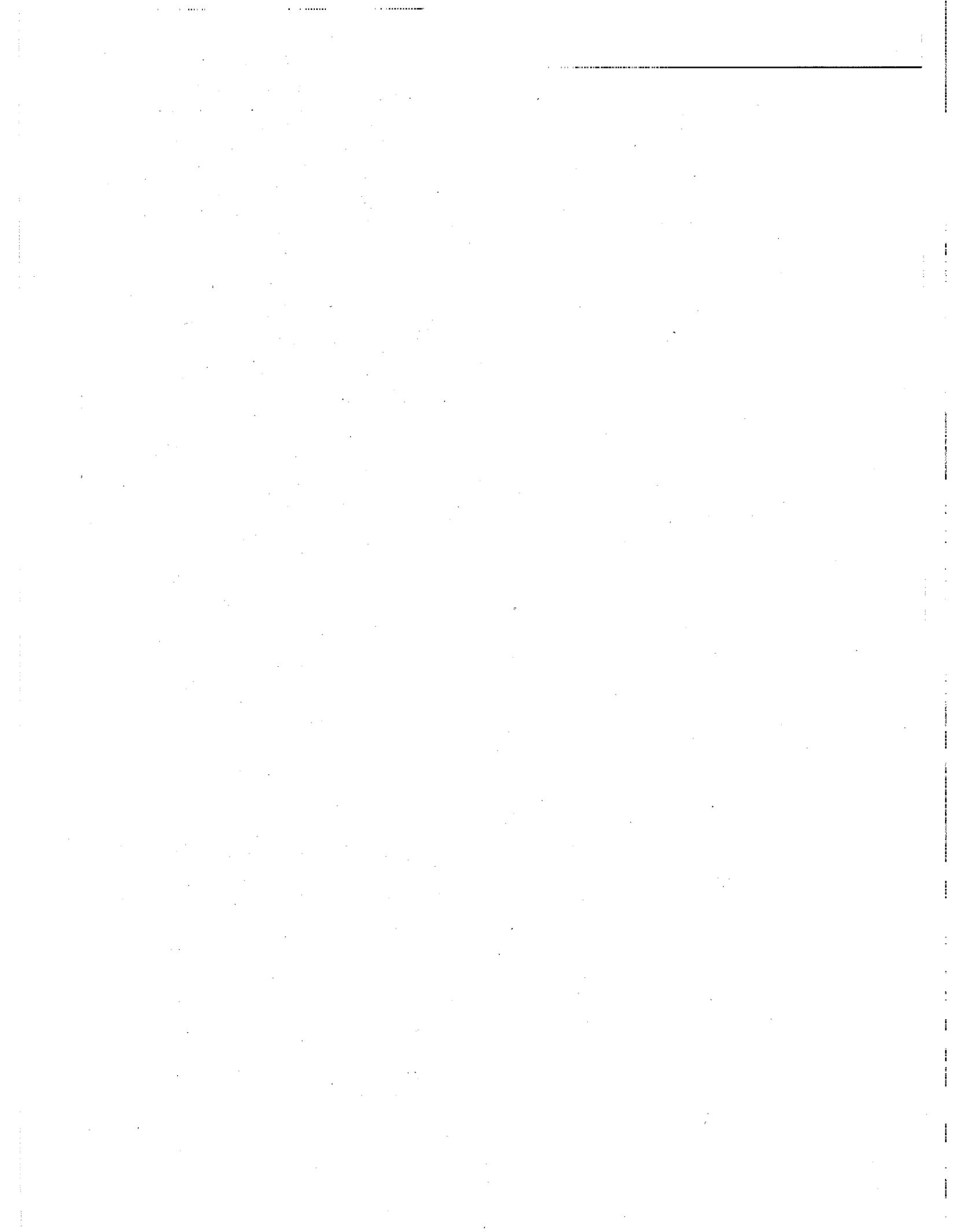


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General Government Division

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July 21, 1994

The Honorable Frank McCloskey
Chairman, Subcommittee on the
Civil Service
Committee on Post Office and Civil Service
House of Representatives

The Honorable Constance Morella
House of Representatives

This report examines the representation of women and minorities in the federal workforce. It covers 75 agencies ranging in size from 3 employees to 4,690 employees.

In May and October 1991, at the request of the Chairman, Senate Committee on Governmental Affairs, we reported on the federal affirmative employment program and the representation of women and minorities in the federal civilian white-collar workforce.¹ We found that while improvements had occurred, the federal civilian workforce did not reflect the nation's diverse population as of September 1990. We also reported on individual agency compliance with Equal Employment Opportunity Commission (EEOC) reporting requirements and on women and minority representation in the 35 largest federal agencies, which in fiscal year 1988 collectively employed about 98 percent of the federal workforce.²

In your request letter, you asked that we do a similar study of affirmative employment in agencies not included in our earlier review. This report is the result of our study during which we (1) examined representation of women and minorities in the remaining 75 agencies that were required to report to EEOC and were not included in our earlier review and (2) assessed the usefulness and clarity of EEOC's requirements for affirmative employment planning by these agencies and their compliance with the requirements.

¹Federal Affirmative Action: Better EEOC Guidance and Agency Analysis of Underrepresentation Needed (GAO/GGD-91-86, May 10, 1991); Federal Affirmative Action: Better EEOC Guidance and Agency Analysis of Underrepresentation Needed (GAO/T-GGD-91-32, May 16, 1991); and Federal Affirmative Employment: Status of Women and Minority Representation in the Federal Workforce (GAO/T-GGD-92-2, Oct. 23, 1991).

²At the request of the Senate Committee on Governmental Affairs, we also included the National Archives and Records Administration in our review even though it was not among the 35 largest federal agencies. The total number of agencies we reported on was 36.

Background

The Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972, requires federal agencies to develop and implement affirmative employment programs to eliminate the historic underrepresentation of women and minorities in the workforce.

Executive Order 12067 gave EEOC lead coordinating responsibility for all federal equal employment opportunity programs and activities. EEOC is to provide agencies with guidance on their affirmative employment programs and also to approve agency plans for those programs.

EEOC's Management Directive (MD) 714, issued in October 1987 and currently in effect,³ contains requirements for federal agency affirmative employment program planning and reporting. MD-714 prescribes to federal agencies instructions, policies, procedures, guidance, and formats for the development and submission of multiyear affirmative employment program plans, annual affirmative employment program accomplishment reports, and annual affirmative employment program plan updates.

According to MD-714, the first step in the affirmative employment program planning process is for agencies to conduct a comprehensive program analysis of the current status of their affirmative employment efforts. For program analysis purposes, the affirmative employment program is divided into eight program elements. These eight program elements are: organization and resources, workforce, discrimination complaints, recruitment and hiring, employment development programs, promotions, separations, and program evaluation. Under certain of these elements, agencies should examine the representation of women and minority employees at the different pay grades and in key jobs. Key jobs are defined by EEOC as nonclerical jobs that have advancement potential to senior-level positions and are held by 100 or more employees. Secondly, MD-714 instructs agencies to evaluate their policies, procedures, and systems that may affect the employment of women and minorities. Thirdly, agencies are to develop statements of objectives that will resolve each identified problem. These objectives should contain action items, the name of an official responsible for accomplishing each action item, and target dates for completing each action item.

MD-714 requires agencies with 500 or more employees to aggregate multiyear affirmative employment program plans and annual accomplishment reports and updates from subordinate units (if any) and

³EEOC has drafted a new directive to replace MD-714. EEOC officials told us they have sent the draft to agencies for comment and intend for the directive to become effective on October 1, 1994.

to submit an agencywide plan, report, and update to EEOC. We refer to these agencies as being of "medium"⁴ size. MD-714 exempts agencies with fewer than 500 employees from developing or submitting multiyear plans and annual reports; although according to EEOC officials, these agencies are still required to do program and barrier analyses. We refer to these agencies as being of "small" size.

Previous EEOC guidance required small agencies to submit plans and reports. MD-714 instead requires small agencies to submit to EEOC, once at the beginning of the multiyear reporting cycle, an EEOC Form 567, Commitment to Equal Employment Opportunity, which is signed by the agency head. When small agencies submit a signed Form 567, the agency affirms its commitment to equal employment opportunity (EEO). According to EEOC guidance on federal affirmative employment planning, the reduction in reporting requirements for agencies with fewer than 500 employees is based on the need to eliminate unnecessary paperwork.

EEOC provided a listing of 75 agencies that were not included in our earlier review.⁵ As of September 1990, 25 of these 75 agencies each had 500 or more employees and were, therefore, required under MD-714 to submit affirmative employment plans to EEOC. Twenty of these medium agencies reported data to the Office of Personnel Management's (OPM) Central Personnel Data File (CPDF), which is the source of our data, in 1984 and 1992; and these agencies combined employed 25,851 full-time permanent employees as of September 1992. Fifty of the 75 agencies had fewer than 500 employees and were considered small agencies. These agencies were required only to submit statements affirming their commitments to EEO. Thirty-nine of these 50 small agencies reported data to CPDF in 1984 and 1992, and these agencies combined employed 5,503 full-time permanent employees as of September 1992. All of our workforce analyses were based on those agencies included in our 75 medium and small agencies that reported data to CPDF.

Our analyses include only full-time permanent employees in general schedule (GS) and GS-related grades. EEOC guidance requires agencies to include full-time and part-time permanent employees in affirmative

⁴The term "medium," as used in this report, refers to the 25 agencies we reviewed that had 500 or more employees and is used as a term of convenience to differentiate these agencies from "small" agencies with fewer than 500 employees. It is not used to compare the size of these agencies with the size of other agencies.

⁵As mentioned earlier, our 1991 review included the 35 largest agencies plus the National Archives and Records Administration. Our review of these 75 agencies continues where our 1991 review ended. (We identify the 75 agencies in appendix II.) In addition, EEOC's listing of agencies required to follow MD-714 is not static. As of December 2, 1993, 121 agencies were on the EEOC's list.

employment planning. However, as of September 30, 1992, less than one-half of 1 percent of the medium and small agency permanent workforce was part-time. Because of the small number of part-time permanent employees, we do not believe our results would differ substantially if we had included part-time employees.

Results in Brief

Mixed progress was made in improving women and minority representation in medium and small agencies. Overall, at both medium and small agencies, the percentages of white women and minority men and women increased from 1984 to 1992. However, when compared to the national civilian labor force (CLF) by PATCO category,⁶ white women and minority men and women, except for black males and black females, were frequently underrepresented. On the other hand, white women and minority men and women were being hired and promoted at rates that would improve their relative shares of the workforce. In addition, white women and minority men and women generally increased in number relative to the predominant group, white men, from 1984 to 1992 at grades 11 through 15. Still, in 1992, white women and minorities were less well represented at upper grade levels than at grade 10 or below.

Women and minorities were often underrepresented in key jobs at medium agencies. In comparison to their representation in similar occupations in the nation's CLF, white women, Hispanics, Asians, and Native Americans were underrepresented in 20 or more of the 31 key jobs. Black women were underrepresented in 13 and black men in 4 of the 31 key jobs. Because small agencies are not required to develop plans in which they would identify key jobs, we could not easily identify these agencies' key jobs. Thus, we did not analyze workforce data on key jobs in small agencies.

The EEOC Form 567, which we refer to as the commitment statement, affirms the agency's commitment to Title VII of the Civil Rights Act of 1964 but does not indicate whether the agency has an affirmative employment program in place. Specific reporting requirements for agencies with fewer than 500 employees would enable EEOC to identify, monitor, and evaluate small agency affirmative employment programs.

⁶During the 1970s, the former Civil Service Commission (now OPM) created and defined five employment categories by which federal agencies could group occupational series for various purposes: professional, administrative, technical, clerical, and other (PATCO). These categories are now used in many areas of federal personnel administration, and they are key elements in CPDF.

Small agency EEO personnel were uncertain regarding EEOC's affirmative employment requirements for agencies with fewer than 500 employees. Although MD-714 does not require small agencies to develop plans or submit annual reports, EEOC officials told us that MD-714 does require small agencies to do EEO program and barrier analyses. The officials agreed that requirements for small agencies under MD-714 could be clearer to ensure those agencies are meeting program requirements. In addition to EEO officials at our four case study agencies, we surveyed EEO officials in eight additional small agencies to identify what they believed small agencies were required to do under MD-714. The EEO officials in 8 of the 12 small agencies believed that completion and submission of the commitment statement was their agencies' only affirmative employment requirement under MD-714.

All 75 medium and small agencies complied with EEOC reporting requirements. Each of the 25 medium agencies had submitted affirmative employment plans to EEOC. However, most of the affirmative employment plans were submitted late, and many of the plans were approved without including the required workforce analysis. Each of the 50 small agencies had submitted a commitment statement to EEOC.

Approach

Using data from OPM's CPDF, we developed EEO profiles of employees in the 75 medium and small agencies as of September 1984 and September 1992. We also analyzed data on employee hires, promotions, and separations for all of fiscal years 1984 and 1992. Because of the large number of agencies, but small number of employees by individual agencies, we combined data from the agencies to make these analyses. Therefore, a specific agency's EEO profile and progress may differ from our aggregated results.

We selected fiscal year 1984 as the comparison year because it was the most distant year for which we had data in which separations were identified in CPDF the same way as they were in 1992. Fiscal year 1992 was the most current year for which data for an entire year were available. We did not verify the CPDF or the CLF data. Appendix IX provides the "raw" numbers used in our analyses.

We used representation indexes to show the extent to which a particular EEO group was represented in the medium and small agency workforces as compared to the group's representation in the nation's CLF. We used 1980 and 1990 CLF data, the most current data available. The representation index can range from 0 to 100 plus, with 100 plus indicating full

representation in numbers proportional to the group's numbers in CLF and lower numbers indicating underrepresentation. The 10 EEO groups we examined were white males and females, black males and females, Hispanic males and females, Asian males and females, and Native American males and females.⁷

We also used a ratio-based analytical technique to analyze data on hiring, promotions, and separations from employment. We introduced this technique in an earlier report.⁸ Using the technique, we compared the number of women and minority employees with the number of white men who were similarly hired, promoted, or separated from employment. We selected white men as the benchmark to which other EEO groups were compared because they have historically predominated the management levels of the white-collar workforce. We used the term "relative number" to refer to the number of women or minorities in a particular category for every 1,000 white men in that same category.

As an example of how relative numbers were computed, in 1984 there were 5,807 white women and 9,331 white men in medium agencies. The resulting ratio of .622 (5,807/9,331) can be interpreted to mean that in 1984 there were 622 white women for every 1,000 white men at medium agencies. In 1992, there were 649 white women for every 1,000 white men at medium agencies. The magnitude of the increase over time can then be computed by taking ratios of the relative numbers. So the increase in the number of white women relative to white men at medium agencies can be calculated to be 1.04 (649/622). In other words, the relative numbers of white women increased by a factor of 1.04, or 4 percent, between 1984 and 1992.

We reviewed medium agencies' affirmative employment plans to identify those agencies' affirmative planning activities. To identify affirmative planning efforts at agencies not required to write affirmative employment plans, we did case study analyses at four small agencies. The four agencies were the Corporation for National Community Service (CNCS),⁹ the Inter-American Foundation (IAF), the Merit Systems Protection Board (MSPB), and the Overseas Private Investment Corporation (OPIC). The agencies ranged in workforce size from 70 to 400 full-time permanent

⁷For brevity, we identified Asian American/Pacific Islanders as Asian and Native American/Alaskan Natives as Native American.

⁸Affirmative Employment: Assessing Progress of EEO Groups in Key Federal Jobs Can Be Improved (GAO/GGD-93-65, Mar. 26, 1993).

⁹Formerly ACTION (The Federal Domestic Volunteer Agency).

employees. We interviewed EEO and personnel officials from these four agencies and EEO personnel from eight other randomly selected small agencies. We also interviewed federal sector programs officials in the EEOC's Office of Federal Operations, which is responsible for reviewing and approving agencies' affirmative employment plans.

We performed our review from January 1992 to November 1993. More information about our objectives, scope, and methodology is presented in appendix I. We obtained written comments from the Chairman, EEOC, on a draft of this report (see app. X). Our review was performed in accordance with generally accepted government auditing standards.

Agencies in Compliance With EEOC Reporting Requirements, but Most Plans Submitted Late

Current multiyear affirmative employment plans have been in use since fiscal year 1988. MD-714 required medium agencies to submit affirmative employment plans to EEOC by February 1988; EEOC had to approve the plans. Each of the 25 medium agencies complied with EEOC reporting requirements. The medium agencies all submitted plans, and EEOC approved those plans. MD-714 required small agencies to submit a commitment statement, but not plans, to EEOC. Each of the 50 small agencies complied with EEOC reporting requirements. They all submitted commitment statements.

Only 1 of the 25 medium agencies submitted its affirmative employment plan by the date due. Of the 24 agencies that were late, 11 submitted plans within 4 months after the due date, 6 submitted plans 5 to 12 months after the due date, and 7 submitted plans more than 12 months after the due date.

As part of the affirmative employment plan, EEOC required medium agencies to identify their key jobs and to analyze workforce data for those positions. Of the 25 agency plans approved by EEOC, 23 medium agencies had identified key jobs in their plans. However, only 13 of the agencies had included the required workforce analyses in their plans.

In our May 1991 report, we recommended that EEOC (1) analyze the time agencies took to prepare plans, (2) develop standards for completing the requirements associated with writing plans, and (3) hold agencies and EEOC officials accountable for meeting the standards. In responding to our report, EEOC reported that it had analyzed the amount of time taken to prepare and submit plans and had developed new procedures for ensuring timely submission and approval of agency plans. In the same report, we

also recommended that EEOC withhold plan approval until all required data and analyses are included. EEOC officials responded in 1991 that EEOC would no longer approve plans that lack the required data and analyses.

Mixed Progress Made in Improving Women and Minority Representation

We made various analyses to determine the standing, over time, of women and minority representation at medium and small agencies. The results show mixed progress for white women and minority men and women since 1984.

PATCO Analyses

MD-714 requires medium and small agencies to group employees' occupations by PATCO category and then to compare each EEO group's percentage in a particular category to its percentage in that category in the CLF. If the CLF percentage is higher, the EEO group is considered underrepresented in the agency in that category. This type of analysis using the PATCO occupational categories provides a broad overview of women and minority representation.

At medium and small agencies, the percentages of women and minorities in many PATCO categories increased between 1984 and 1992. Even so, in 1992, medium agencies had 37 of 50 PATCO categories with underrepresentation, 2 fewer than in 1984. Also in 1992, small agencies had 23 of 40 categories with underrepresentation, 2 fewer than in 1984.¹⁰ See appendix III for data on women and minority representation by PATCO.

For the PATCO categories where underrepresentation existed, the representation indexes for most EEO groups were below 80. The lower the number from 100, the greater the indicated underrepresentation. All EEO groups, except black men and women, were underrepresented in at least one PATCO category in 1992. Black men and women were at or above full representation in each PATCO category reviewed at both medium and small agencies.

We compared the professional and administrative workforces of small, medium, and large agencies¹¹ with the professional and administrative categories in the 1990 CLF. Appendix IV shows this comparison. More than

¹⁰We examined 50 EEO groups or categories using PATCO divisions (10 EEO groups x 5 PATCO occupational categories) for medium agencies and 40 EEO groups (10 x 4 PATCO categories) for small agencies. We did not examine the "other" category for small agencies because it had fewer than 100 employees as of September 30, 1984, and as of September 30, 1992.

¹¹Large agencies are the 25 agencies we testified on in 1991.

half of the government's white-collar employees are in these two occupational categories. Large agencies had fewer instances—fewer EEO groups—of underrepresentation than medium and small agencies.

Key Job Analyses

As reported earlier in this report, the affirmative employment plans of 23 of the 25 medium agencies identified their key jobs. These occupations, according to EEOC officials, should be the focus of the agencies' EEO recruiting, hiring, and promotion efforts. Because small agencies are not required to develop plans in which they would identify their key jobs, we could not easily identify small agency key jobs. Thus, we did not analyze key jobs in small agencies.

We reviewed 31 occupations from 15 of the 25 medium agencies (see app. VI). We were unable to review occupations from 10 agencies because of occupational definition or data problems. We compared the September 1992 workforce of each occupation with the workforce of a similar occupation in the 1990 CLF. For example, we compared attorneys as identified in CPDF with lawyers as identified in CLF.

Within the 15 agencies, 1 or more EEO groups were underrepresented in all 31 occupations. White women, Hispanic men and women, Asian men and women, and Native American men and women experienced the most instances of underrepresentation. Each was underrepresented in 20 or more occupations. Black women were underrepresented in 13 of the 31 occupations. Black men had the fewest instances of underrepresentation; they were underrepresented in four occupations.

Relative Standing of Women and Minorities

Thus far, we have been comparing medium and small agencies to a benchmark external to individual agencies, CLF. However, for the analyses in this section, we changed from an external benchmark to an internal benchmark, white male employees of medium and small agencies. We used white male employees as our benchmark because they have historically predominated in the management levels of the white-collar workforce.

For analyses in this section, we combined data on black, Hispanic, Asian, and Native American men into a single category, minority men. We combined data on black, Hispanic, Asian, and Native American women into a single category, minority women. We combined these data because

the numbers of hires, separations, and promotions in each separate EEO group were very small.

Relative Number of Hires and Separations

We compared the relative number of white women and minority men and women who were hired or who separated from employment during fiscal years 1984 and 1992 with the relative number of white women and minority men and women who were employed at the end of those years (September). We recognize that the end number could have been affected by the hires and separations during the year. Nevertheless, the comparison does indicate whether progress was made (see app. VII).

At medium agencies in 1992, minority women were hired into jobs at relatively lower levels than the levels at which they were already employed in those jobs. In general, therefore, the EEO composition of new hires in 1992 did not help to improve the relative numbers of minority women in medium agencies. In contrast, white women and minority men were hired into medium agencies at relatively higher levels than the levels at which they were employed. Thus, the EEO composition of new hires in 1992 helped to improve the relative numbers of white women and minority men in medium agencies.

At small agencies in 1992, white women and minority men and women were all hired into jobs at relatively higher levels than the levels at which they were employed. Thus, the EEO composition of new hires in 1992 helped to improve the relative numbers of white women and minority men and women.

With respect to separations at medium agencies, white women and minority men and women all were separating in 1992 at relatively higher levels than the levels at which they were already employed. For example, among medium agency workers in 1992, 470 minority women were employed for every 1,000 white men employed, but minority women were separating at a rate of 541 per 1,000 white men separating. In small agencies, white women and minority men and women all were separating in 1992 at relatively higher levels than the levels at which they were already employed. For example, among small agency workers in 1992, 773 white women were employed for every 1,000 white men employed, but white women were separating at a rate of 1,253 per 1,000 white men separating.

Relative Number of Workforce Employed by Grade

We compared, by grade, the workforce of medium agencies in 1984 with the workforce of medium agencies in 1992. White women and minority men and women all increased in relative number in comparison to the number of white men employed at each pay grade from grades 11 through 15. For each of these five pay grades, the relative increases for minority women were larger than the relative increases for white women, while in the three highest grades (grades 13 through 15) the relative increases for white women were greater than the relative increases for minority men. In percentage terms, most relative increases for minority women were from 26 to 209 percent; for white women, 11 to 105 percent; and for minority men, 31 to 60 percent.

We also compared the 1984 and 1992 workforces of small agencies by grade. Minority women and white women increased in relative number at grades 11 through 15. Relative increases for minority women ranged from 45 to 152 percent, and relative increases for white women ranged from 22 to 81 percent at grades 11 through 15.

Notwithstanding the general improvement in the relative numbers of women and minorities in medium and small agencies, certain disparities remained. Women and minorities were still less well represented at upper grade levels than at grade 10 or below. For example, for every 1,000 white men working at medium agencies in grades 10 or below in 1992, there were 6,809 white women and minority men and women similarly employed. At grade 15 in the same year, for every 1,000 white men working, there were 337 white women and minorities similarly employed. See appendix V for more data on women and minority relative standing by grade.

Relative Number of Promotions

Concerning promotions in 1984 and 1992, white and minority women in grades 11 through 15 at both medium and small agencies were almost all promoted at levels that exceeded their existing employment levels at those grades. For example, the relative number of minority women in medium agencies promoted to grade 15 was 47 percent higher in 1992 than the relative number of minority women already employed in that grade. This relative number suggested that improvement was occurring. However, the promotion levels of minority men in medium and small agencies were mixed. For example, in 1992 there were fewer minority men promoted per 1,000 white men in medium and small agencies to grades 13 and 14 than the relative number employed at those grades. However, minority men in

medium and small agencies were promoted to grade 15 at higher levels than minority men already employed at that grade.

Case Study Observations

To identify what affirmative employment efforts small agencies make instead of developing and submitting to EEOC affirmative employment plans and annual reports, we did case study reviews at the following four small agencies: CNCS, IAF, MSPB, and OPIC. Our observations from these studies include the following.

We found that two of the four agencies prepared affirmative employment plans. At one agency, the agency Director asked EEOC to do an on-site review of the agency's affirmative employment program because she believed improvements could be made in the area. We also found that EEO Directors at three of the four agencies wanted additional guidance from the EEOC about what is expected of small agency affirmative employment programs. Case study summaries are included in appendix VIII.

Clarification of Small Agency Requirements Needed

EEOC's MD-714 lays out requirements for agency affirmative employment program planning and reporting. MD-714 exempts small agencies from developing plans and submitting annual reports; although, according to EEOC officials, MD-714 does require small agencies to do EEO program and barrier analyses. In addition, MD-714 requires small agencies to complete and submit a commitment statement affirming the agency's commitment to EEO. We found that a number of small agencies believed their exemption from the writing and reporting requirement of MD-714 also exempted them from doing the required affirmative employment program planning.

We spoke with officials from 12 small agencies to identify their interpretation of small agency affirmative employment requirements under MD-714. Eight of the 12 small agencies reported that their only affirmative employment requirement was to complete and submit the commitment statement. The remaining 4 of the 12 agencies believed that specific affirmative employment program planning was required, along with completion of the commitment statement, and the agencies had done such planning. Among these 12 agencies were 4 agencies that we studied further (see app. VII). Three of these four agencies' EEO Directors said that reporting requirements that would more clearly specify the planning items they had to do would help to focus and improve their programs.

According to EEOC officials, small agencies are required to do all affirmative employment planning as outlined in MD-714. However, the officials agreed that small agency requirements should be made clearer to better ensure small agencies are meeting all program requirements.

EEOC Needs Additional Information From Small Agencies

According to EEOC, requirements for federal agency affirmative employment programs were first established by Executive Order 11478 in 1969. EEOC has been charged with ensuring that agencies develop and implement these programs. Because EEOC has exempted agencies with fewer than 500 employees from developing multiyear plans and submitting annual reports, EEOC tries to increase agency heads' awareness of their responsibilities by having these agencies submit commitment statements. EEOC guidance says small agencies are exempted from developing plans and submitting annual reports because of the need to eliminate unnecessary paperwork. Commitment statements affirm the agency's commitment to equal employment opportunity. Although small agencies complete the commitment statement, the document does not provide information on an agency's affirmative employment program. As a result, EEOC has no means for determining whether small agencies have implemented adequate affirmative employment programs. As an alternative to the commitment statement, we believe small agencies could certify that they have affirmative employment programs in place and provide some information about their affirmative employment program activities.

EEOC officials said that EEOC lacks the staff to review and approve the additional paper flow that would result from requiring small agencies to submit plans. The officials also said that developing and submitting plans and reports would be an undue burden for many small agencies. However, EEOC officials subsequently informed us that they were considering requiring small agencies to submit workforce EEO profiles by PATCO category and by grade level. The officials explained that they were considering this proposal to make small agencies more aware that they are part of the federal affirmative employment program and to hold small agencies more accountable for their workforce EEO profiles.

Conclusion

Overall representation of women and minorities in small and medium agencies had increased from 1984 to 1992. Increases in representation levels were made but even with the increases, underrepresentation existed in 37 of 50 PATCO occupational categories for medium agencies and in 23 of

40 categories for small agencies as of September 1992. In addition, in medium agency key jobs, those that lead to senior-level positions, we found that underrepresentation existed in every key job. However, in agency personnel events that enabled one to enter into and progress within the workforce, we found that women and minorities were being hired and promoted at rates that would improve their relative shares of the workforce.

EEOC needs to strengthen the management of the federal EEO program by clarifying its requirements for small agencies and ensuring that small agencies are held accountable for developing and implementing affirmative employment programs. MD-714 is unclear regarding requirements for small agencies, and as a result, not all small agencies may be doing the amount of affirmative employment planning that EEOC intended.

In place of affirmative employment plans, EEOC requires small agencies to submit a statement affirming their commitment to equal employment opportunity. This commitment statement, however, does not ensure that these agencies are following EEOC's requirement for affirmative employment planning nor does it provide EEOC with additional information to show that they are in compliance.

Recommendations

We recommend that the EEOC Chairman strengthen emphasis of the federal affirmative employment program at small agencies by

- clarifying the planning and reporting requirements of small agencies and
- requiring agencies to certify that they are carrying out those requirements and provide some information about their program (for example, agencies could certify on a checklist whether or not they are complying with each of the planning and reporting requirements).

Agency Comments and Our Evaluation

EEOC provided written comments on a draft of this report. Appendix X contains a copy of EEOC's May 10, 1994, letter and our additional comments. The EEOC Chairman said that while small agencies do not submit specific information on their affirmative employment activities for minorities and women under MD-714, EEOC is able to monitor their affirmative employment progress by reviewing small agencies' workforce profiles in the CPDF. He said that EEOC has prepared a new affirmative employment planning directive that will require small agencies to develop

and implement multiyear affirmative employment plans, as well as submit updates and annual accomplishment reports. This directive, he said, will advise all agencies that if their multiyear plans do not contain all elements required by the directive, including workforce analysis, EEOC will disapprove the plan. He added that EEOC has an automated tracking system that identifies agencies that have not submitted their plans and annual reports.

The new directive, which will replace MD-714, was in draft as of May 10, 1994, and EEOC sent the draft directive to agencies for comment. We have read the draft directive, and we believe that if finalized as it is currently written and properly implemented, it should satisfy our recommendations. For example, the new directive would require small agencies to certify that their plans are in compliance with the specific requirements of the directive rather than to submit a general commitment to equal employment opportunity, as is now the case. The draft directive is scheduled to go into effect on October 1, 1994.

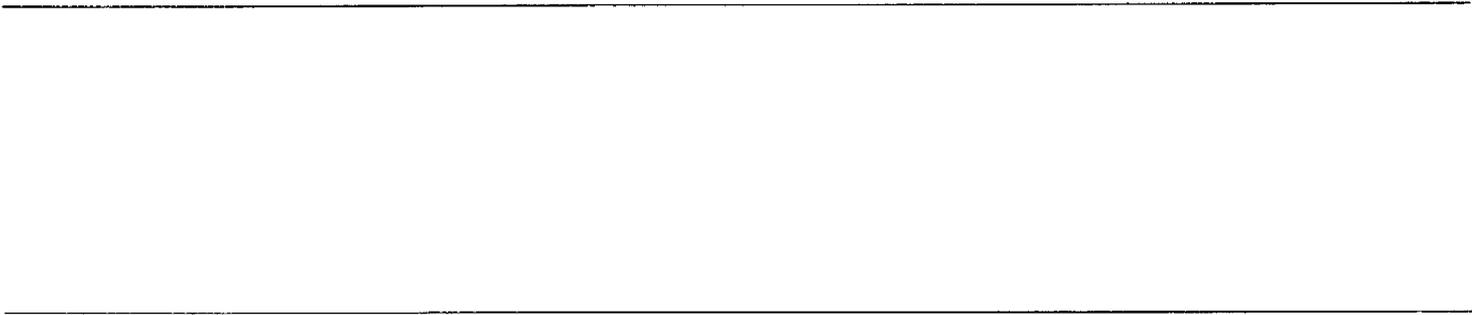
In addition to obtaining written comments from EEOC, we met with EEO and personnel officials from CNCS, IAF, MSPB, and OPIC to discuss specific results of our case study analyses and preliminary conclusions and recommendations in this report. We have incorporated their comments in appendix VIII.

As arranged with the Subcommittee, unless you publicly release its contents earlier, we plan no further distribution of this report until 30 days from the date of this report. At that time, we will send copies to the Chairman of EEOC, the Director of OPM, the heads of our four case study agencies, and other interested parties. We will also make copies available to others upon request.

This report was prepared under the direction of Steven J. Wozny, Assistant Director, Federal Human Resource Management Issues. Other major contributors are listed in appendix XI. If you have any questions about this report, please contact me at (202) 512-5074.



Nancy Kingsbury
Director
Federal Human Resource Management
Issues



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Abbreviations

CLF	Civilian Labor Force
CNCS	Corporation for National Community Service
CPDF	Central Personnel Data File
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
FEORP	Federal Equal Opportunity Recruitment Program
GS	general schedule
HRM	human resources management
IAF	Inter-American Foundation
MD	management directive
MSPB	Merit Systems Protection Board
OPIC	Overseas Private Investment Corporation
OPM	Office of Personnel Management
PATCO	professional, administrative, technical, clerical, and other

Objectives, Scope, and Methodology

The Equal Employment Opportunity Commission (EEOC) provides instructions and guidance on affirmative employment planning to executive agencies. EEOC gave us its list of the agencies that must follow its directives for use in an earlier review, and the 35 largest agencies were listed. We reported on these 35 largest agencies in 1991.¹ The House Subcommittee on the Civil Service asked us to review women and minority representation in those agencies not covered by our 1991 work. This review covers 75 agencies, which according to EEOC officials were the remaining agencies required to follow EEOC's Management Directive (MD) 714, that we did not include in our earlier review. Twenty-five of these 75 agencies had 500 or more employees. We referred to them as "medium" agencies. Twenty of these medium agencies reported data to the Office of Personnel Management's (OPM) Central Personnel Data File (CPDF) in fiscal year 1984 and also in fiscal year 1992. The remaining 50 agencies each had fewer than 500 employees. We referred to them as "small" agencies. Thirty-nine of these small agencies reported data to CPDF in fiscal year 1984 and also in fiscal year 1992. With the exception of our analysis of medium agency key jobs, all of our workforce analyses were based on those agencies that reported data to CPDF in both fiscal years 1984 and 1992. We did not verify CPDF data.

As agreed with the Subcommittee, the objectives of our review were to (1) examine the representation of women and minorities in medium and small agencies and (2) assess the usefulness and clarity of EEOC's requirements for affirmative employment planning by these agencies and their compliance with the requirements.

We reviewed relevant equal employment opportunity (EEO) statutes and guidance issued by EEOC and OPM. We also reviewed medium agency multiyear plans, updates, and accomplishment reports, and commitment statements for the 50 small agencies. We interviewed EEO officials at our four case study agencies and at eight other randomly selected small agencies. We also met with officials from EEOC.

Due to the relatively small numbers of employees in medium and small agencies, we combined data on these agencies' individual EEO groups into the categories of minority women (black, Hispanic, Native American, and Asian women) and minority men (black, Hispanic, Native American, and Asian men) for analysis purposes. Because of the different reporting requirements for agencies with 500 or more employees and those with

¹GAO/GGD-91-86, May 10, 1991.

fewer than 500 employees, we did separate representation analyses for these 2 categories of agencies.

We obtained from EEOC fiscal years 1988 through 1993 multiyear affirmative employment plans for the 25 medium agencies and EEO commitment statements for the 50 small agencies covering the same period. We reviewed each of the multiyear plans for compliance with EEOC reporting requirements. For both the plans and commitment statements we checked agency submission dates to determine whether agencies submitted the documents to EEOC on time.

We used EEOC's standards and evaluation techniques to determine whether women and minorities were fully represented in small and medium agency workforces. The EEOC uses these standards and techniques to evaluate the EEO efforts of federal agencies. According to EEOC standards, an EEO group is underrepresented if the percentage at which an EEO group is represented in an agency's workforce is less than the rate at which the group is represented in the appropriate national civilian labor force (CLF). CLF represents persons 16 years of age or over who are employed or seeking employment, excluding those in the armed forces. We used 1990 CLF data, which is the most current CLF data available, for comparison against 1992 agency workforce data and 1980 CLF data for comparison against 1984 agency workforce data. We did not verify CLF data.

To gauge representation, EEOC grouped (1) the federal government's 420 white-collar jobs into the 5 PATCO² categories and (2) each CLF occupation into the same PATCO category as its federal counterpart, with some exceptions. EEOC uses the PATCO-grouped CLF data as the base against which EEOC compares workforce data that agencies align by PATCO category and key job. EEOC also instructs agencies to use the PATCO-grouped CLF data as the base of comparison.

However, there can be alternatives to using this base. EEOC, at the request of an agency, may allow other criteria to be used as a comparison base. One such other criterion is occupation-specific CLF data. We used this occupation-specific CLF data as the comparison base when doing our analysis of women and minority representation in medium agency key jobs.

We did not examine medium agencies' key jobs where there were fewer than 100 employees in a particular job. We adopted this cutoff because OPM

²OPM's five employment categories: professional, administrative, technical, clerical, and other.

guidance encourages that representation analyses be performed for groupings of 100 or more employees to permit more reasonable comparison with CLF data.

To identify how small agencies administer their affirmative employment programs in place of developing and submitting formal plans to the EEOC, we did case study reviews at four small agencies. We stratified the 50 small agencies according to number of employees and selected 1 agency from each stratification. Two of the case study agencies, the Overseas Private Investment Corporation (OPIC) and the Inter-American Foundation (IAF) were randomly selected. The remaining two, the Corporation for National Community Service (CNCS) and the Merit Systems Protection Board (MSPB) were purposefully selected. The Subcommittee specifically asked that we review CNCS. We reported on MSPB's time-and-attendance and personnel practices in 1991.³ We found perceptions of a discriminatory work environment at MSPB by past and present MSPB employees, and we also noted an instability in the leadership of MSPB's EEO and personnel offices. That review suggested we take a further look at MSPB's EEO program.

We talked with EEO personnel from eight randomly selected small agencies to identify what they believed MD-714 requires of small agencies. We also met with personnel and EEO officials from CNCS, IAF, MSPB, and OPIC and reviewed these agencies' EEO policies and documents. In many instances, the four agencies provided us with written responses to our questions.

Using CPDF data, we also did representation analyses of these agency's workforces by PATCO occupational categories. In many cases, the numbers in each PATCO category were below the OPM recommended cutoff for representation analysis. In those instances, we did significance testing to determine whether the difference between an agency's EEO profile and the CLF EEO profile for the same PATCO category was large enough to be statistically significant.

³Merit Systems Protection Board: Time-And-Attendance and Personnel Practices Need Attention (GAO/GGD-91-104, Aug. 8, 1991).

Identification of Agencies and Definition of Personnel Events Included in the Study

The purpose of this appendix is to identify the 75 agencies included in our review and to explain our definitions of the 3 personnel events we examined—hires, separations, and promotions.

Agencies Reviewed

The names of the 25 medium agencies and the 50 small agencies we reviewed are listed in tables II.1 and II.2. Also listed is the number of full-time employees in each agency as of September 30, 1992. The 15 agencies whose key jobs we reviewed and the 4 case study agencies are noted.

**Appendix II
Identification of Agencies and Definition of
Personnel Events Included in the Study**

**Table II.1: List of Medium Agencies
and Number of Full-Time Employees
as of September 30, 1992**

Agency	Number of full-time employees
Administrative Office of the United States Courts	NA
Commodity Futures Trading Commission ^a	553
Department of Defense:	
Defense Information Systems Agency ^a	4,690
Defense Nuclear Agency	752
Office of the Inspector General ^a	1,538
Office of the Secretary ^a	1,445
Uniformed Services University of the Health Sciences	413
Federal Communications Commission ^a	1,735
Federal Emergency Management Agency ^a	2,362
Federal Energy Regulatory Commission	NA
Federal Reserve	NA
Federal Trade Commission ^a	871
Interstate Commerce Commission ^a	596
John F. Kennedy Center for the Performing Arts	NA
National Archives and Records Administration ^a	2,037
National Credit Union Administration ^a	889
National Gallery of Art ^a	611
National Labor Relations Board ^a	2,050
National Science Foundation	1,122
Office of Management and Budget ^a	551
Panama Canal Commission	464
Pension Benefit Guaranty Corporation	540
Railroad Retirement Board ^a	1,731
Securities and Exchange Commission ^a	2,474
United States Soldiers' and Airmen's Home	464

Note 1: The Panama Canal Commission and the Uniformed Services University of the Health Sciences each had over 500 employees on the source list we obtained from EEOC, dated September 30, 1990, and submitted plans. Therefore, we included them as medium agencies.

Note 2: NA is nonapplicable. Agencies with NA for the number of full-time employees did not report workforce data to CPDF for fiscal year 1992.

Note 3: The table shows a total of 25 agencies, of which 21 reported workforce data to CPDF for fiscal year 1992. In appendix I, we said 20 of the 25 agencies reported data to CPDF. That statement referred to the number of agencies that reported data in both fiscal years 1984 and 1992.

^aIncluded in key job analyses.

Source: CPDF data.

**Appendix II
Identification of Agencies and Definition of
Personnel Events Included in the Study**

**Table II.2: List of Small Agencies and
Number of Full-Time Employees as of
September 30, 1992**

Agency	Number of full-time employees
Administrative Conference of the United States	21
Advisory Commission on Intergovernmental Relations	17
Advisory Council on Historic Preservation	31
African Development Foundation	37
American Battle Monuments Commission	29
Appalachian Regional Commission	9
Architectural and Transportation Barriers Compliance Access Board	25
Board for International Broadcasting	11
Commission of Fine Arts	7
Commission on Civil Rights	72
Committee for Purchase From People Who Are Blind or Severely Disabled	16
Consumer Product Safety Commission	495
Corporation for National Community Service ^a	400
Department of Defense: Office of Civilian Health and Medical Program of the Uniformed Services	205
Farm Credit Administration	448
Federal Election Commission	248
Federal Housing Finance Board	96
Federal Labor Relations Authority	236
Federal Maritime Commission	197
Federal Mediation and Conciliation Service	316
Federal Mine Safety and Health Review Commission	39
Federal Retirement Thrift Investment Board	83
Harry S Truman Scholarship Foundation	5
International Boundary and Water Commission, United States and Mexico	160
Inter-American Foundation ^a	70
Japan-United States Friendship Commission	3
Marine Mammal Commission	11
Merit Systems Protection Board ^a	288
National Capital Planning Commission	47
National Commission on Libraries and Information Science	5
National Commission for Employment Policy	12
National Council on Disability	7
National Endowment for the Arts	222
National Endowment for the Humanities	257

(continued)

**Appendix II
Identification of Agencies and Definition of
Personnel Events Included in the Study**

Agency	Number of full-time employees
National Mediation Board	47
National Transportation Safety Board	331
Occupational Safety and Health Review Commission	68
Office of Federal Inspector for the Alaska National Gas Transportation System	NA
Office of Government Ethics	68
Office of National Drug Control Policy	86
Office of Navajo and Hopi Indian Relocation	75
Overseas Private Investment Corporation ^a	140
Pennsylvania Avenue Development Corporation	29
Postal Rate Commission	NA
Selective Service System	239
Thrift Depositor Protection Oversight Board	NA
United States Arms Control and Disarmament Agency	183
United States Holocaust Memorial Council	26
United States International Trade Commission	421
United States Tax Court	214

Note 1: NA is nonapplicable. Agencies with NA for the number of full-time employees did not report workforce data to CPDF for fiscal year 1992.

Note 2: The table shows a total of 50 agencies, of which 47 reported workforce data to CPDF for fiscal year 1992. In appendix I, we said 39 of the 50 agencies reported data to CPDF. That statement referred to the number of agencies that reported data in both fiscal years 1984 and 1992.

^aCase study agency.

Source: CPDF data.

Personnel Events

All of our analyses of personnel events were restricted to those involving full-time permanent federal employees in the medium and small agencies reporting both 1984 and 1992 data to CPDF. CPDF contains multiple codes that identify various types of hires, conversions, separations, and promotions. Because we exercised some judgment in determining which codes to use to define the population of employees who were hired, converted, separated, and promoted, we present here a full explanation of the categories included in our definitions.

**Appendix II
Identification of Agencies and Definition of
Personnel Events Included in the Study**

Hires

In our definition of permanent hires, we included only the following types of appointments: career, career-conditional, excepted, reinstatement-career, and reinstatement-career-conditional. We also analyzed certain "conversion to appointment" actions, which change an employee from one appointment to another appointment. Those actions we analyzed included conversion to career appointment and conversion to career-conditional appointment. We consolidated appointment and conversion data and refer to this data as hire information.

Separations

We included both voluntary and involuntary separations from federal employment. Involuntary separations comprised the following categories: mandatory retirement, retirement due to disability, retirement in lieu of involuntary action, resignation in lieu of involuntary action, removal, termination due to disability, expiration of appointment, involuntary termination, termination, discharge during probation/trial period, and discharge. Voluntary separations comprised voluntary retirement, special option retirement, resignation, termination due to sponsor relocating, and termination due to military service. Termination due to transfer from one agency to another and separation due to death were not included in our definition of separation.

Promotions

Promotions included permanent promotions and temporary or term promotions. They also included promotions obtained competitively and promotions obtained noncompetitively.

Women and Minority Representation by PATCO Category

EEOC requires agencies to analyze workforce data by PATCO category to gauge women and minority representation. We analyzed workforce data for medium and small agencies to determine (1) changes in representation since 1984, (2) the direction of those changes, and (3) whether full representation had been achieved.

To determine representation levels, we computed representation indexes using September 1984 and September 1992 CPDF data and 1980 and 1990 CLF data. The CPDF data were of full-time permanent employees. The indexes indicate the extent to which an EEO group is represented in a workforce as compared to the group's representation in CLF. The index can range from 0 to 100 plus with 100 plus indicating full representation and lower numbers indicating underrepresentation.

Representation by PATCO Category in Medium Agencies

Table III.1 shows the 50 categories (10 EEO groups x 5 PATCO categories) we analyzed for the medium group of agencies. The group had only limited success in improving the representation of women and minorities.

**Appendix III
Women and Minority Representation by
PATCO Category**

Table III.1: Representation Indexes of Medium Agency Employees by PATCO Category as of September 30, 1984, and September 30, 1992

PATCO category	Men					Women				
	White	Black	Hispanic	Asian	Native American	White	Black	Hispanic	Asian	Native American
Professional										
1984	117	199	57	62	92	62	113	52	52	15
1992	113	196	77	69	89	74	146	61	59	6
Administrative										
1984	95	134	56	49	55	92	289	85	90	43
1992	119	152	64	75	67	69	210	60	66	61
Technical										
1984	57	222	49	30	55	89	435	75	57	79
1992	55	207	39	33	27	74	542	62	70	55
Clerical										
1984	16	174	17	30	0	84	408	68	58	75
1992	31	199	31	43	58	61	469	67	82	63
Other										
1984	44	677	157	88	28	14	53	38	0	0
1992	36	556	105	21	0	18	435	25	84	0

Note 1: Numbers show agencies' full-time permanent PATCO workforce as a percentage of the 1980 and 1990 national CLF. The index was computed by dividing the workforce percentages by the CLF percentage and multiplying the result by 100.

Note 2: Numbers less than 100, including 0, indicate areas of underrepresentation.

Source: CPDF and CLF data.

In 1984, full representation existed in 11 categories and underrepresentation existed in 39 categories. For these 39 categories in 1992, the index for 20 categories was higher than in 1984, the index for 18 categories was lower than in 1984, and the index for 1 category remained the same. In 1992, full representation existed in 13 categories, 2 more than in 1984. The improvement is attributable to white men in the administrative category and black women in the "other" category.

The status of full representation was achieved more often with black employees. They were fully represented in all PATCO categories in 1992. On the other hand, Asian men and women, Native American men and women, white women, and Hispanic women were below full representation in all PATCO categories in 1992.

**Appendix III
Women and Minority Representation by
PATCO Category**

**Representation by
PATCO Category in
Small Agencies**

Table III.2 shows the 40 categories (10 EEO groups x 4 PATCO categories) we analyzed for the group of small agencies. We were unable to analyze the other category because it had too few employees—fewer than 100 employees in either September 1984 or September 1992.

Table III.2: Representation Indexes of Small Agency Employees by PATCO Category as of September 30, 1984, and September 30, 1992

PATCO category	Men					Women				
	White	Black	Hispanic	Asian	Native American	White	Black	Hispanic	Asian	Native American
Professional										
1984	101	206	57	41	135	86	149	66	76	0
1992	104	192	62	37	526	90	175	58	55	81
Administrative										
1984	89	176	59	66	135	92	263	55	62	255
1992	120	171	64	70	121	68	205	29	62	121
Technical										
1984	19	214	0	0	0	105	627	80	107	94
1992	32	198	10	25	116	85	576	96	116	155
Clerical										
1984	13	199	14	0	0	84	393	55	105	99
1992	24	182	14	14	0	68	439	56	91	255

Note 1: Numbers show agencies' full-time permanent PATCO workforce as a percentage of the 1980 and 1990 national CLF. The index was computed by dividing the workforce percentages by the CLF percentage and multiplying the result by 100.

Note 2: Numbers less than 100, including 0, indicate areas of underrepresentation.

Source: CPDF and CLF data.

The small agency group had mixed success in improving the representation of women and minorities. In 1984, full representation existed in 15 categories and underrepresentation existed in 25 categories. For these 25 categories in 1992, the representation index for 16 categories was higher than the index in 1984, the index was lower for 6 categories, and for 3 categories the index remained the same. In 1992, full representation existed in 17 categories, 2 more than in 1984. The difference is attributable to the movement of four EEO groups: white men in the administrative category and Native American women in the clerical and technical categories all achieved full representation, while white women in the technical category fell below full representation.

**Appendix III
Women and Minority Representation by
PATCO Category**

The status of full representation was achieved more often with black employees. Black employees were fully represented in all categories in both 1984 and 1992. In comparing 1984 and 1992 representation indexes, white women, Hispanic women, and Asian women experienced the most instances of decreased representation.

Women and Minority Representation in the Professional and Administrative Categories Compared by Agency Group

Our 1991 testimony examined women and minority representation in 25 large federal agencies. For this report, we determined whether women and minority representation in medium and small agencies differed from their representation in large agencies. We limited our analyses to employees in the professional and administrative categories because the majority of employees were in those two categories.

Representation by Agency Group

We determined women and minority representation in the administrative and professional categories and compared the results by EEO group. To determine representation levels, we computed representation indexes using September 1992 CPDF data and 1990 CLF data.

As table IV.1 shows, large agencies had more categories of full representation than medium and small agencies as of September 30, 1992. In categories where large agencies had less than full representation, the representation levels they achieved were usually higher than the levels in medium and small agencies. Between medium and small agencies, small agencies achieved full representation in more categories than medium agencies.

Table IV.1: Comparison of Small, Medium, and Large Agencies' Professional and Administrative Workforce Representation Indexes as of September 30, 1992

EEO group	Professional			Administrative		
	Small	Medium	Large	Small	Medium	Large
White men	104	113	106	120	119	119
White women	90	74	79	68	69	70
Black men	192	196	134	171	152	143
Black women	175	146	142	205	210	148
Hispanic men	62	77	110	64	64	114
Hispanic women	58	61	98	29	60	72
Asian men	37	69	106	70	75	88
Asian women	55	59	107	62	66	71
Native American men	526	89	250	121	67	241
Native American women	81	6	248	121	61	193

Note: Numbers show combined agency full-time permanent workforces as a percentage of the national CLF.

Source: CPDF and 1990 CLF data.

Women and Minority Relative Standing by Grade

EEOC requires agencies to analyze workforce data by grade groupings to gauge where women and minorities stand in the agencies' hierarchy. Even if they were fully represented in the federal labor force, women and minority representation would be incomplete if they mostly occupied the lower or higher ranks. We analyzed full-time permanent workforce data for medium and small agencies to determine (1) where white women and minority men and women stood by grade level in relation to white males and (2) how much change by grade level occurred in representation levels between 1984 and 1992 for white women and minority men and women relative to white males.

To determine changes by grade level, we divided the number of white women and minority men and women at a given grade level by the number of white men in that same grade in the same year. White men were selected as the benchmark because they have historically dominated the management levels of the white-collar workforce and because it seemed reasonable to consider how the number of women and minorities have changed over time relative to white men. Throughout this appendix, the term "relative number" refers to how many white women and minority men and women there were per 1,000 white men in a particular category of the total workforce.

Most federal employees are in white-collar occupations and under a white-collar pay schedule that includes pay grades 1 through 15.¹ Grades 13 through 15 employees are often considered the federal government's middle managers. The government's top career managers are in the Senior Executive Service.

Representation at Upper Grades in Medium Agencies

Tables V.1, V.2, and V.3 show that the relative numbers of white women and minority men and women at medium agencies increased at almost every grade level between 1984 and 1992. The only exceptions being white women in grades 10 and below. Relative gains for minority women were higher than for white women. Gains for white women at the upper grade levels, grades 13 through 15, exceeded gains for minority men at those grade levels.

¹We are referring to jobs under the General Schedule (GS) pay plan, the Equivalent to General Schedule pay plan, and the Senior Executive Service pay plan. The GS pay plan is the basic compensation schedule for most federal civilian white-collar employees. The Equivalent to General Schedule pay plan includes, for example, the pay plan for Foreign Service employees at the Department of State and pay plans for physicians and nurses at the Department of Veterans Affairs.

**Appendix V
Women and Minority Relative Standing by
Grade**

Table V.1: Relative Number of White Women Per 1,000 White Men at Different Grades Among Employees at Medium Agencies in Fiscal Years 1984 and 1992

Fiscal year	White women					
	Grades 1-10	Grade 11	Grade 12	Grade 13	Grade 14	Grade 15
1984	3,031	815	363	271	194	114
1992	2,712	906	563	469	358	234
Ratio: 1992 to 1984 ^a	0.89	1.11	1.55	1.73	1.85	2.05

Note: The numbers shown are relative rather than actual numbers of employees. For each category, the relative number was computed by dividing the actual number of employees in an EEO group by the actual number of white male employees and multiplying the result by 1,000. Data were as of September 1984 and September 1992.

^aThe ratio was obtained by dividing the relative number for 1992 by the relative number for 1984. For example, the change in the relative number of white women at grade 11 was calculated as $906/815 = 1.11$, which means an 11-percent increase.

Source: CPDF data.

Table V.2: Relative Number of Minority Women Per 1,000 White Men at Different Grades Among Employees at Medium Agencies in Fiscal Years 1984 and 1992

Fiscal year	Minority women					
	Grades 1-10	Grade 11	Grade 12	Grade 13	Grade 14	Grade 15
1984	2,605	321	125	69	33	11
1992	3,285	659	255	159	62	34
Ratio: 1992 to 1984 ^a	1.26	2.05	2.04	2.30	1.88	3.09

Note: The numbers shown are relative rather than actual numbers of employees. For each category, the relative number was computed by dividing the actual number of employees in an EEO group by the actual number of white male employees and multiplying the result by 1,000. Data were as of September 1984 and September 1992.

^aThe ratio was obtained by dividing the relative number for 1992 by the relative number for 1984. For example, the change in the relative number of minority women at grade 11 was calculated as $659/321 = 2.05$, which means a 105-percent increase.

Source: CPDF data.

**Appendix V
Women and Minority Relative Standing by
Grade**

Table V.3: Relative Number of Minority Men Per 1,000 White Men at Different Grades Among Employees at Medium Agencies in Fiscal Years 1984 and 1992

Fiscal year	Minority men					
	Grades 1-10	Grade 11	Grade 12	Grade 13	Grade 14	Grade 15
1984	762	226	135	136	89	43
1992	812	314	213	178	121	69
Ratio: 1992 to 1984 ^a	1.07	1.39	1.58	1.31	1.36	1.60

Note: The numbers shown are relative rather than actual numbers of employees. For each category, the relative number was computed by dividing the actual number of employees in an EEO group by the actual number of white male employees and multiplying the result by 1,000. Data were as of September 1984 and September 1992.

^aThe ratio was obtained by dividing the relative number for 1992 by the relative number for 1984. For example, the change in the relative number of minority men at grade 11 was calculated as $314/226 = 1.39$, which means a 39-percent increase.

Source: CPDF data.

With a couple of exceptions, tables V.1, V.2, and V.3 show that relative gains made in the upper grades for the three groups were greater than gains made at lower grades. At grades 13, 14, and 15, for example, white women had 73-percent, 85-percent, and 105-percent increases, respectively. Minority women in these same grades had 130-percent, 88-percent, and 209-percent increases, respectively. On the other hand, minority men had increases of 31-percent, 36-percent, and 60-percent, respectively. The tables also show that the relative numbers of women and minorities in medium agencies at upper grades were smaller than those at lower grades.

**Representation at
Upper Grades in Small
Agencies**

Tables V.4, V.5, and V.6 show that the relative numbers increased for all groups and at all grades 11 through 15, except for minority men at grade 15. There was no increase in representation for any group in grades 1 through 10. Relative gains for minority women were generally above those for white women and minority men.

**Appendix V
Women and Minority Relative Standing by
Grade**

Table V.4: Relative Number of White Women Per 1,000 White Men at Different Grades Among Employees at Small Agencies in Fiscal Years 1984 and 1992

Fiscal year	White women					
	Grades 1-10	Grade 11	Grade 12	Grade 13	Grade 14	Grade 15
1984	5,494	1,370	721	366	183	189
1992	3,759	1,667	891	530	331	242
Ratio: 1992 to 1984 ^a	0.68	1.22	1.24	1.45	1.81	1.28

Note: The numbers shown are relative rather than actual numbers of employees. For each category, the relative number was computed by dividing the actual number of employees in an EEO group by the actual number of white male employees and multiplying the result by 1,000. Data were as of September 1984 and September 1992.

^aThe ratio was obtained by dividing the relative number for 1992 by the relative number for 1984. For example, the change in the relative number of white women at grade 11 was calculated as $1,667/1,370 = 1.22$, which means a 22-percent increase.

Source: CPDF data.

Table V.5: Relative Number of Minority Women Per 1,000 White Men at Different Grades Among Employees at Small Agencies in Fiscal Years 1984 and 1992

Fiscal year	Minority women					
	Grades 1-10	Grade 11	Grade 12	Grade 13	Grade 14	Grade 15
1984	4,615	504	229	113	44	25
1992	4,523	957	441	164	77	63
Ratio: 1992 to 1984 ^a	0.98	1.90	1.93	1.45	1.75	2.52

Note: The numbers shown are relative rather than actual numbers of employees. For each category, the relative number was computed by dividing the actual number of employees in an EEO group by the actual number of white male employees and multiplying the result by 1,000. Data were as of September 1984 and September 1992.

^aThe ratio was obtained by dividing the relative number for 1992 by the relative number for 1984. For example, the change in the relative number of minority women at grade 11 was calculated as $957/504 = 1.90$, which means a 90-percent increase.

Source: CPDF data.

**Appendix V
Women and Minority Relative Standing by
Grade**

Table V.6: Relative Number of Minority Men Per 1,000 White Men at Different Grades Among Employees at Small Agencies in Fiscal Years 1984 and 1992

Fiscal year	Minority men					
	Grades 1-10	Grade 11	Grade 12	Grade 13	Grade 14	Grade 15
1984	859	277	264	140	112	90
1992	835	368	282	206	121	78
Ratio: 1992 to 1984 ^a	0.97	1.33	1.07	1.47	1.08	0.87

Note: The numbers shown are relative rather than actual numbers of employees. For each category, the relative number was computed by dividing the actual number of employees in an EEO group by the actual number of white male employees and multiplying the result by 1,000. Data were as of September 1984 and September 1992.

^aThe ratio was obtained by dividing the relative number for 1992 by the relative number for 1984. For example, the change in the relative number of minority men at grade 11 was calculated as $368/277 = 1.33$, which means a 33-percent increase.

Source: CPDF data.

Women and Minority Representation at Medium Agencies by Key Job

EEOC requires agencies with 500 or more employees to include in their affirmative employment plans, workforce profiles of their key jobs. Since our May 1991 report,¹ EEOC has clarified its definition of key jobs as only those nonclerical jobs held by 100 or more employees that have advancement potential to senior-level positions.

We determined the extent to which women and minorities were represented in medium agency key jobs. The agencies had identified the jobs in their affirmative employment plans, and we reviewed a total of 31 key jobs in 15 medium agencies.² The names of the 15 agencies are provided in appendix II.

Representation in Key Jobs in Medium Agencies

At the 15 agencies, white women and minority men and women were more likely to be employed in jobs that were not key jobs. While they made up about 56 percent of the total workforce of the 15 agencies, they accounted for about 45 percent of the key job employees.

In addition, women and minorities were very often underrepresented in the 31 key jobs in relation to their presentation in CLF for similar occupations. As table VI.1 shows, underrepresentation existed in every key job. All EEO groups, except black men, black women, and Asian women, were underrepresented in more than two-thirds of the 31 key jobs.

Table VI.1: Number and Percentage of the 31 Key Jobs in Which Women and Minorities Were Underrepresented as of September 30, 1992

EEO group	Number	Percentage
White women	23	74
Black men	4	13
Black women	13	42
Hispanic men	26	84
Hispanic women	24	77
Asian men	21	68
Asian women	20	65
Native American men	22	71
Native American women	27	87

Source: CPDF and CLF data.

¹GAO/GGD-91-86, May 10, 1991.

²We eliminated 10 medium agencies from our key job analysis because these agencies either (1) did not report 1992 data to CPDF, (2) did not identify key jobs in their affirmative employment plans, or (3) employed fewer than 100 employees in their key jobs.

Personnel Events in Fiscal Years 1984 and 1992 for Women and Minorities

Another method of measuring affirmative employment efforts to reflect the nation's diverse population is to look at the personnel events that bring people into and out of the federal workforce as well as their progression in that workforce. These events include recruitment, hiring, training and development, promotion, and separation. We analyzed CPDF data on agency hires, promotions, and separations during fiscal years 1984 and 1992.¹ We looked at only those persons in full-time permanent positions. Training and development data, however, could not be similarly analyzed because of limitations associated with the data that agencies and OPM collect and/or computerize.

We looked at the relative numbers of each EEO group that were hired to medium and small agencies in fiscal years 1984 and 1992, at the relative numbers that were separated in both years, and at the relative numbers that were promoted during the same period.

Despite data limitations, analyses of hires and separations data can nonetheless yield useful information about factors that affect the composition of the workforce. Such analyses help ascertain whether the relative numbers hired or separated differed in 1992 from 1984 or whether they vary across EEO groups in ways that might, favorably or unfavorably, affect the attempt to improve the numbers of women and minorities in the workforce. Similarly, these analyses can help to suggest whether the relative numbers of the different EEO groups promoted have affected, favorably or unfavorably, the distribution of these groups across grades.

Hires

White women and minority men and women were hired to permanent positions in medium agencies at relatively lower levels in 1992 than in 1984. The relative numbers of white women and minority men hired in 1992 were above the relative numbers of white women and minority men employed in 1992. For example, in 1992 at medium agencies, there were 950 white women hired for every 1,000 white men hired at a time when there were 649 white women working for every 1,000 white men so employed. Minority women, by comparison, were hired in 1992 in lower relative numbers than they were already employed at medium agencies. In 1992, in other words, white women and minority men were hired at rates that would (disregarding separations) have increased their relative numbers in the workforce, while minority women were hired at rates that

¹In appendix II, we explained how we defined hires, promotions, and separations for the purposes of this study.

**Appendix VII
Personnel Events in Fiscal Years 1984 and
1992 for Women and Minorities**

would (disregarding separations) have decreased their relative numbers in the workforce.

White women and minority women were hired to permanent positions in small agencies at relatively lower levels in 1992 than in 1984. Minority men were hired at relatively higher levels in 1992 than in 1984. The relative numbers of white women and minority men and women hired in 1992 exceeded their relative numbers employed. Thus, each of these three EEO groups were hired at rates that would (disregarding separations) have increased their relative numbers in the workforce.

Separations

The relative numbers of white women separating from medium agencies were lower in 1992 than in 1984. For minority men and women the opposite was true; these two EEO groups' relative numbers separating were higher in 1992 than in 1984. For all three EEO groups, the relative numbers separating in 1992 exceeded the relative numbers employed.

The relative numbers of white women and minority men and women separating from small agencies were higher in 1992 than in 1984. The relative numbers separating in 1992 for all three EEO groups in small agencies exceeded their relative numbers employed.

Table VII.1 indicates the differences in the relative numbers hired compared to those separating for white women and minority men and women at medium agencies. Table VII.2 shows similar differences for white women and minority men and women at small agencies.

Table VII.1: Relative Numbers of White Women, Minority Men, and Minority Women Employed, Hired, and Separated Among Medium Agency Employees in Fiscal Years 1984 and 1992

EEO group	Fiscal year	Hired	Employed	Separated ^a
White women	1984	1,016	622	945
	1992	950	649	867
Minority men	1984	270	191	215
	1992	248	215	254
Minority women	1984	610	401	524
	1992	440 ^a	470	541

^aThe relative numbers that entered the workforce were less than the relative numbers employed or the relative numbers that separated from the workforce were greater than the relative numbers employed.

Source: CPDF data.

**Appendix VII
Personnel Events in Fiscal Years 1984 and
1992 for Women and Minorities**

Table VII.2: Relative Numbers of White Women, Minority Men, and Minority Women Employed, Hired, and Separated Among Small Agency Employees in Fiscal Years 1984 and 1992

EEO group	Fiscal year	Hired	Employed	Separated^a
White women	1984	1,397	750	1,178
	1992	1,178	773	1,253
Minority men	1984	162 ^a	195	208
	1992	315	208	260
Minority women	1984	687	451	563
	1992	548	521	637

^aThe relative numbers that entered the workforce were less than the relative numbers employed or the relative numbers that separated from the workforce were greater than the relative numbers employed.

Source: CPDF data.

Promotions

Unlike hires and separations, promotions do not affect the composition of the workforce, because promotions neither add to nor subtract from the workforce population. At the same time, promotions can affect the distribution of different groups across the various grades in the workforce, since it is through promotions that workers move from one grade to another.

As reported in appendix V, the relative numbers of white women and minority men and women at medium and small agencies increased at almost every grade level between 1984 and 1992. Our discussion in the rest of this appendix (except tables VII.3 and VII.4) refer to the promotions that occurred in 1 year from that period, fiscal year 1992.

Table VII.3 shows that in 1992 white women at medium agencies were promoted to grades 11 through 15 in relative numbers that exceeded the relative numbers of white women already employed in those grades. The table also shows that the promotion levels of minority women in grades 11 through 15 in 1992, although less favorable than those of white women, also exceeded the relative numbers of minority women already employed in those grades. Unlike for white and minority women, the relative number of minority men who were promoted in 1992 did not always exceed the number of minority men already employed. Minority men were promoted to grades 11 and below and grades 12 through 14 at lower levels in 1992 than the relative numbers employed in those grades.

**Appendix VII
Personnel Events in Fiscal Years 1984 and
1992 for Women and Minorities**

Table VII.3: Relative Numbers of White Women, Minority Men, and Minority Women Per 1,000 White Men Employed In and Promoted at Medium Agencies From Fiscal Years 1984 and 1992 at Various Grades

EEO group	Year	Grades 1-10		Grades 11-12		Grades 13-14		Grade 15	
		Employed	Promoted	Employed	Promoted	Employed	Promoted	Employed	Promoted
White women	1984	3,031	3,761	494	779	234	451	114	258
	1992	2,712	2,554	656	729	414	693	234	513
Minority men	1984	762	627	161	166	113	102	43	61
	1992	812	680	240	215	150	134	69	109
Minority women	1984	2,605	3,035	182	276	52	90	11	15
	1992	3,285	3,260	365	379	111	179	34	50

Note: The numbers shown are relative rather than actual numbers of employees. For each category, the relative number was computed by dividing the actual number employees in an EEO group by the actual number of white male employees and multiplying the result by 1,000.

Source: CPDF data.

Table VII.4 shows that in 1992 minority women at small agencies were also promoted to grades 11 through 15 in relative numbers that exceeded the relative numbers of minority women already employed in those grades. White women, at grades 13 through 15, were promoted in higher relative numbers than the white women already employed in those grades. Minority men were promoted to grade 15 at higher levels than they were already employed at that grade.

Table VII.4: Relative Numbers of White Women, Minority Men, and Minority Women Per 1,000 White Men Employed In and Promoted at Small Agencies From Fiscal Years 1984 and 1992 at Various Grades

EEO group	Year	Grades 1-10		Grades 11-12		Grades 13-14		Grade 15	
		Employed	Promoted	Employed	Promoted	Employed	Promoted	Employed	Promoted
White women	1984	5,494	6,188	926	1,348	261	588	189	263
	1992	3,759	3,555	1,146	1,014	419	695	242	355
Minority men	1984	859	875	268	174	124	82	90	53
	1992	835	830	310	167	159	134	78	129
Minority women	1984	4,615	3,781	316	674	74	129	25	53
	1992	4,523	3,085	611	722	116	220	63	194

Note: The numbers shown are relative rather than actual numbers of employees. For each category, the relative number was computed by dividing the actual number employees in an EEO group by the actual number of white male employees and multiplying the result by 1,000.

Source: CPDF data.

Small Agency Case Studies

Agencies with fewer than 500 employees are not required by the EEOC to develop affirmative employment plans or submit annual reports to EEOC. However, according to EEOC officials, these "small" agencies are required to do affirmative employment program planning as outlined in MD-714. To identify the type and extent of affirmative employment program planning being done in small agencies, we selected four small agencies for case study analyses.

The small agencies were the Corporation for National Community Service (CNCS), the Overseas Private Investment Corporation (OPIC), the Merit Systems Protection Board (MSPB), and the Inter-American Foundation (IAF). Since the purpose of our efforts was to identify the affirmative employment planning undertaken by these agencies, we did not audit these agencies' programs. Instead, we provided some examples of what these agencies do. This information was provided to us primarily by each agencies' EEO officials. We did not attempt to verify the information provided.

According to MD-714, a program analysis of the current status of all affirmative employment efforts within an agency is the first step of affirmative employment planning. The next step is the agency's barrier analysis, which is the identification of problems and barriers that may be the cause of workforce imbalances. For our reporting purposes, we have categorized agency affirmative employment planning efforts under these two categories. In addition, we compared agency workforce data by PATCO category to corresponding data in the 1990 CLF.

At the time of our study, each of these four agencies was doing some type of affirmative employment planning, the extent of which varied by agency. Two of the four agencies, although not required to do so, have prepared affirmative employment plans. Three of the four agencies' EEO Directors said that clearer reporting requirements that specified planning items would improve their agencies' programs.

Corporation for National Community Service

CNCS is the principal agency in the federal government for administering and coordinating the domestic volunteer service programs sponsored by the government. The agency has 9 regional offices, which support 47 individual state offices and Puerto Rico. CNCS employed, as of September 30, 1992, 400 full-time permanent white-collar employees. According to a CNCS official, most of the agency's upper graded positions are in the GS-301, Miscellaneous Administration and Program, job series.

Program Analysis

According to the head of the agency, CNCS' EEO/affirmative action objectives are to ensure that all employment and operational actions are based on qualifications and programmatic needs rather than on nonmerit factors. CNCS' equal opportunity staff is a part of its Office of the Director.

At CNCS' request, EEOC did an on-site review of CNCS' affirmative employment program in April 1991.¹ EEOC reported that although CNCS had complied with EEOC's management directives and had successfully incorporated a commitment to equal opportunity into various agency personnel actions, the agency could do more to attain its objectives. For example, EEOC recommended that the job responsibilities of particular employees in EEO groups who occupy lower grade level positions should be evaluated for potential grade level increases, depending on the employees' scope of responsibilities and job performance.

CNCS analyzes its workforce profile over time and compares these data with results of prior analyses and CLF data. The agency also reviews its percentage of women and minorities in GS-13 and above positions. According to CNCS officials, the agency's recruitment sources are producing qualified minority and female applicants. In response to a recommendation by EEOC, CNCS has expanded its mailing list to include schools with large Hispanic and black student populations. In its April 1991 audit report, EEOC stated that CNCS should continue its attempts to raise the percentage of minority selections in the higher grade levels and the percentage of selections of Native Americans and Hispanics overall. CNCS planned to follow up the EEOC's analysis in fiscal 1993 with an in-house analysis of CNCS' employment practices for EEO impact.

EEOC also recommended that CNCS direct attention toward employee development programs and career counseling to prepare individuals in targeted EEO groups for promotion opportunities. CNCS collected and reviewed career development and career counseling information from other agencies, and CNCS concluded that it was too small to provide a large-scale career counseling program; however, CNCS would provide this service if requested by its employees.

Barrier Analysis

The EEO Staff Director said that (1) CNCS' EEO office performs statistical studies to address employment barriers that might restrict minorities and

¹Report of An On-site Program Review of the EEO/AE Programs: ACTION (The Federal Domestic Volunteer Agency) (EEOC, Apr. 26, 1991 through May 2, 1991). CNCS was formerly ACTION.

women and (2) CNCS is taking corrective actions, as a result of EEOC recommendations, to improve its program.

CNCS estimated that in fiscal year 1991 only 20 percent of its job applicants have provided the optional EEO background information when applying for agency positions. Given this low response rate, CNCS officials have decided to evaluate employment profile changes in the CNCS workforce rather than compare selections to applications.

According to CNCS, agency selection results for fiscal years 1990 and 1991 indicated that there were no barriers restricting the hiring of women and minorities. CNCS reported that it reviews selection trends, including promotions within the agency. During fiscal year 1993, CNCS' equal opportunity staff planned to conduct an impact evaluation on employment changes over a 2-year period, fiscal years 1991 and 1992, that would include both separations and accession data.

According to EEOC's audit report, CNCS had evaluated employee performance awards received in fiscal years 1989 and 1990 to determine whether there had been any adverse impact on women and minorities. Adverse impact was found for all minority groups, when compared to whites, in CNCS' Performance Management Systems awards in both fiscal years 1989 and 1990. However, CNCS found no adverse impact in Performance Management Recognition System awards for fiscal year 1989 and in Special Act awards received in fiscal years 1989 and 1990. CNCS did not conduct further examinations on the basis of its adverse impact findings because although adverse impact was found in fiscal year 1990, there was also an improvement in minority award rates in that year. CNCS, according to the EEOC report, stated that if adverse impact was found in its scheduled fiscal year 1991 review, a further examination would be conducted. According to CNCS documentation, the awards impact evaluation planned for the fourth quarter of fiscal year 1991 was postponed due to competing equal opportunity priorities.

Workforce Analysis

Table VIII.1 shows representation indexes for combined EEO groups in CNCS as of September 30, 1992. Because of the relatively small number of employees in each category, we combined EEO groups. Also because of the relatively small numbers of employees, we footnoted those occupational categories where the results were significant. When we say that the results were significant, we are asserting that the EEO profile of the agency was so different from the CLF EEO profile for the same PATCO category that this was

a major difference and one that was statistically meaningful. Table VIII.2 provides the raw numbers used in our analysis.

Table VIII.1: Representation of White and Minority Men and Women at CNCS by PATCO Category as of September 30, 1992

EEO group	Occupational category			
	Professional	Administrative ^a	Technical ^a	Clerical ^a
White men	81	96	25	24
White women	55	68	110	54
Minority men	268	214	0	150
Minority women	250	161	363	316

Note: Numbers show CNCS' PATCO workforce as a percentage of the 1990 national CLF. This type of percentage index indicates the extent to which a particular EEO group was represented in a workforce as compared to the group's representation in CLF. The index can range from 0 to 100+ with 100+ indicating full representation and lower numbers indicating underrepresentation.

^aResults were significant at the p=.05 level. The standard criterion for evaluating statistical results is to use a confidence level of .05. This means that if a value would occur by chance five times or less in a random sample of 100 events, then we were comfortable saying that the observed statistical result was a "real" or "true" result.

Source: 1990 CLF data and CPDF data.

Table VIII.2: Numbers of White and Minority Men and Women at CNCS as of September 30, 1992

EEO group	Occupational category			
	Professional	Administrative	Technical	Clerical
White men	8	107	5	2
White women	3	73	26	21
Minority men	4	45	0	5
Minority women	3	41	24	33

Source: CPDF data.

Inter-American Foundation

IAF, an independent federal government corporation, supports social and economic development in Latin America and the Caribbean by making grants primarily to private, indigenous organizations that carry out self-help projects benefiting poor people. IAF is governed by a nine-member Board of Directors appointed by the president of the United States with the advice and consent of the Senate. By law, six members of the Board are from private-sector organizations, and three members are from the federal government. IAF's Board members include one president, who is IAF's head; one executive vice president; and three vice presidents.

As of September 30, 1992, IAF employed 70 full-time permanent white-collar employees. The majority of IAF's professional employees are in the GS-101, Social Science, job series.

Program Analysis

According to IAF, the agency's affirmative employment goal is to achieve a diverse workforce, while the agency's fiscal year 1993 objectives were to improve its recruitment of minorities, women, veterans, and individuals with disabilities. In December 1992, IAF planned to add additional personnel to the Office of Personnel/EEO to help that office achieve the agency's EEO goals and objectives. As of January 1994, no additional staff had been added.

The EEO director, who is also the personnel director, reports directly to the IAF president on EEO matters. The EEO director's staff includes one full-time personnel management specialist and two collateral duty EEO counselors. The agency does not do statistical analysis of its women and minority workforce. Because of its small size, IAF officials did not believe a comparison with national CLF data was necessary. They believed they could visibly identify where imbalances exist.

IAF officials said that they maintain workforce information relating to race and national origin, handicap reportability, and veterans preference. The officials reported that these data identify a lack of targeted recruitment efforts. IAF analyzes its hiring results for EEO purposes as part of its responsibilities under the Federal Equal Opportunity Recruitment Program (FEORP). IAF's 1992 FEORP report showed that for 1992 the agency targeted black and Hispanic males and females for the GS-101, Social Science, job series as EEO groups needing to be recruited because they were underrepresented in that occupation.

In December 1992, IAF reported that due to the size of the organization and limited personnel assigned to the personnel/EEO office, promotion and separation data had not been analyzed for EEO purposes as outlined in MD-714.

Barrier Analysis

IAF officials stated that with fewer than 100 employees it can easily identify barriers to its EEO efforts. For example, the president of the agency noted that the lack of required supervisory and management training relating to EEO could have significant negative impact. IAF's lack of targeted recruitment was also cited as an additional problem. However, IAF officials

told us that because of limited resources within the personnel/EEO office, they cannot easily address these barriers.

Since the arrival of IAF's current president in 1991, the agency has drafted an EEO policy, appointed two EEO counselors, and trained all supervisors and managers in EEO. IAF was looking into the possibility of establishing a committee that would assume responsibility for identifying specific EEO goals and objectives.

Workforce Analysis

Table VIII.3 shows representation indexes for combined EEO groups in IAF as of September 30, 1992. Because of the relatively small number of employees in each category, we combined EEO groups. Also because of the relatively small numbers of employees, we footnoted those occupational categories where the results were significant. When we say that the results were significant, we are asserting that the EEO profile of the agency was so different from the CLF EEO profile for the same PATCO category that this was a major difference and one that was statistically meaningful. Table VIII.4 provides the raw numbers used in our analyses.

Table VIII.3: White and Minority Men and Women Representation at IAF by PATCO Category as of September 30, 1992

EEO group	Occupational category		
	Professional	Administrative ^a	Technical ^a
White men	114	79	50
White women	83	64	64
Minority men	75	94	0
Minority women	93	347	455

Note 1: Numbers show IAF's PATCO workforce as a percentage of the 1990 national CLF. This type of percentage index indicates the extent to which a particular EEO group was represented in a workforce as compared to the group's representation in CLF. The index can range from 0 to 100+ with 100+ indicating full representation and lower numbers indicating underrepresentation.

Note 2: IAF did not have any employees in the "clerical" category as of September 1992.

^aResults were significant at the p=.05 level. The standard criterion for evaluating statistical results is to use a confidence level of .05. This means that if a value would occur by chance five times or less in a random sample of 100 events, then we were comfortable saying that the observed statistical result was a "real" or "true" result.

Source: 1990 CLF data and CPDF data.

Table VIII.4: Numbers of White and Minority Men and Women at IAF as of September 30, 1992

EEO group	Occupational category		
	Professional	Administrative	Technical
White men	20	9	2
White women	8	7	3
Minority men	2	2	0
Minority women	2	9	6

Source: CPDF data.

Merit Systems Protection Board

MSPB is an independent, quasi-judicial agency in the executive branch, which ensures that (1) federal employees are protected against abuses by their agency's management, (2) executive branch agencies make employment decisions in accordance with the merit system principles, and (3) federal merit systems are kept free of prohibited personnel practices.

The bipartisan Board of Directors consists of a chairman, a vice chairman, and a member. Board members are appointed by the president of the United States, confirmed by the Senate, and serve overlapping, nonrenewable 7-year terms.

The MSPB employed, as of September 30, 1992, 288 full-time permanent white-collar employees. According to MSPB's EEO Director, MSPB's GS-905, General Attorney, job series contains the largest number of MSPB employees and offers the greatest potential for advancement.

Program Analysis

According to MSPB's EEO Director, the agency's EEO objective is to attain a workforce that is representative of CLF. MSPB's EEO office has two full-time permanent employees, one office director, and one equal opportunity specialist. Beginning in fiscal year 1992, and continuing to the present, MSPB has been preparing and implementing an affirmative employment plan.

MSPB analyzes its workforce by PATCO employment categories using national CLF data and federal civilian workforce data for EEO group representational comparison, by GS-905 job series employment category using internal GS-905 EEO data for representational comparison, and by grade-level groupings using internal EEO group data.

MSPB has conducted periodic studies to examine the distribution of promotions within MSPB. These studies showed the women and minority representation in MSPB, percentage of promotions, and promotion rates. MSPB's most recent analyses of promotion rates, completed in fiscal years 1989 and 1990, showed in grades 1 through 8, an 18.5-percent promotion rate for nonminorities and a 27.9-percent rate for minorities; in grades 9 through 12, a 29.2-percent promotion rate for nonminorities and a 4.8-percent promotion rate for minorities; and in grades 13 through 15, a 6.8-percent promotion rate for nonminorities and a 5.7-percent promotion rate for minorities.

MSPB reviews employee separations information on a continuing basis to (1) determine whether the number of separations of any EEO group is consistent with that group's representation in the workforce and (2) identify whether the reasons employees give for leaving may indicate potential EEO problems that are related to any specific EEO group and/or any particular person. The EEO Director said that nothing disturbing has been found—no one race/national origin/gender group was leaving at a higher rate than its group's representation in the workforce.

According to MSPB, the agency does not have a formal system for tracking information on employee skills. Each MSPB supervisor is held accountable for employee development in his/her performance plan under the critical element on human resources management and diversity.

In June 1992, MSPB concluded an organizational analysis that examined MSPB employees' attitudes, opinions, and experiences related to MSPB's organizational culture, climate, and policies. One recommendation stemming from this analysis was for the Board to emphasize and reward management and supervisory actions and office initiatives that demonstrate a commitment to EEO.

Barrier Analysis

MSPB's EEO Director said that MSPB needs an applicant flow collection sheet so that the agency can evaluate its recruiting and hiring processes. MSPB officials reported to us that without this data it cannot obtain basic information needed to identify its applicant pool. For example, MSPB believes that the agency's present recruitment sources are attracting qualified female applicants. The EEO Director explained, however, that with the expiration in December 1983 of the OPM form used to collect applicant background information, the agency had no reliable method of collecting and analyzing applicant flow data that would document the

minority status of its applicants. As a result, the EEO Director said that it is difficult to determine the quality and effect of the agency's recruitment efforts before selection of applicants. MSPB believes that applicant flow data are needed and suggests that EEOC develop a form to capture applicant background data.

MSPB's EEO Director believes that the agency's small size affects a great deal of what can be done in the EEO area. For example, MSPB has only one mainstream occupation (general attorney), unlike at larger agencies where there may be several occupations available to hire or promote people into to change an agency's EEO profile. However, she stated that being small also allows program flexibility and provides MSPB officials the opportunity to work closely with each other to make maximum use of available opportunities to implement and achieve EEO objectives.

MSPB's Office of Management Analysis conducts internal control reviews of all offices, and MSPB's annual reports include EEO workforce data. EEO matters are explored and concerns addressed during these formal management reviews.

Workforce Analysis

Table VIII.5 shows representation indexes for combined EEO groups in MSPB as of September 30, 1992. Because of the relatively small number of employees in each category, we combined EEO groups. Also because of the relatively small numbers of employees, we footnoted those occupational categories where the results were significant. When we say that the results were significant, we are asserting that the EEO profile of the agency was so different from the CLF EEO profile for the same PATCO category that this was a major difference and one that was statistically meaningful. Table VIII.6 provides the raw numbers used in our analyses.

Table VIII.5: White and Minority Men and Women Representation at MSPB by PATCO Category as of September 30, 1992

EEO group	Occupational category			
	Professional	Administrative ^a	Technical ^a	Clerical ^a
White men	88	87	9	20
White women	108	84	106	50
Minority men	108	72	102	0
Minority women	154	249	353	383

Note: Numbers show MSPB's PATCO workforce as a percentage of the 1990 national CLF. This type of percentage index indicates the extent to which a particular EEO group was represented in a workforce as compared to the group's representation in CLF. The index can range from 0 to 100+ with 100+ indicating full representation and lower numbers indicating underrepresentation.

^aResults were significant at the p=.05 level. The standard criterion for evaluating statistical results is to use a confidence level of .05. This means that if a value would occur by chance five times or less in a random sample of 100 events, then we were comfortable saying that the observed statistical result was a "real" or "true" result.

Source: 1990 CLF data and CPDF data.

Table VIII.6: Numbers of White and Minority Men and Women at MSPB as of September 30, 1992

EEO group	Occupational category			
	Professional	Administrative	Technical	Clerical
White men	70	26	1	1
White women	48	24	15	12
Minority men	13	4	3	0
Minority women	15	17	14	25

Source: CPDF data.

Overseas Private Investment Corporation

OPIC is a self-sustaining federal government corporation whose purpose is to promote economic growth in developing countries by encouraging U.S. private investment in those nations. OPIC is organized as a corporation and structured to be responsive to private business. OPIC is headed by a president, with a 15-member Board of Directors providing overall policy direction.

OPIC is organized into six departments: finance, insurance, investment development, legal affairs, management services, and treasury. Each department is headed by a vice president. As of September 30, 1992, OPIC employed 140 full-time permanent white-collar employees, and all were based at its Washington, D.C., headquarters. Approximately 60 percent of these employees were professional/administrative staff who generally fell into one of the following occupational categories: investment officers and

financial analysts, insurance officers and analysts, business development and investor services officers, and attorneys. Employment in these occupational categories generally require backgrounds in law, finance, business, economics, or international affairs. Depending on specific job requirements, foreign language skills may also be required.

Program Analysis

According to the Director of OPIC's Human Resources Management (HRM) Office, OPIC's EEO objective/philosophy is to reflect its multicultural mission by employing a multicultural workforce, which reflects the minority populations in the United States and, as appropriate, the Washington, D.C., area. OPIC's fiscal year 1993 EEO objective was to increase the number of blacks, Hispanics, and Asians in its supervisory and management positions.

According to OPIC, its president has ultimate responsibility for the agency's EEO program. Together, OPIC's EEO director and the HRM office administer OPIC's EEO effort. The EEO director has primary responsibility for the EEO program planning and complaints process, while the HRM office is responsible for planning and administering staffing programs in compliance with federal EEO laws and EEO and affirmative employment objectives. The HRM staff, which is engaged in recruitment activities, is composed of one director, three personnel specialists, and three technicians.

OPIC reviews its EEO profile at the professional, administrative and management, and supervisory levels. The agency also set affirmative employment goals for fiscal year 1993. OPIC established its goals using comparisons to governmentwide workforce data and assessments by OPIC officials of average turnover and hiring opportunities within the agency. According to OPIC officials, fiscal year 1993 is the first year in which OPIC has developed an affirmative employment plan since small agencies were exempted from doing so by EEOC.

OPIC generally does not collect applicant flow data because of its limited resources, but the agency attempts to develop this information for specific recruitment efforts. OPIC officials believed that applicant data were not really needed and stressed that a serious commitment to finding minority applicants was more important. According to OPIC officials, soliciting current minority employees for assistance in identifying recruiting sources for targeted groups has proved more beneficial than typical efforts such as expanding the agency's recruitment mailing list.

The HRM staff reviews and monitors promotion selections and meets with OPIC managers concerning staff's eligibility for promotion. The HRM staff offers advice to managers on the consideration of minorities and women for promotional opportunities. OPIC reported that analyses of current workforce data serves some of the same purposes of separation data analyses. The HRM staff monitors separations and interviews employees who leave OPIC.

OPIC officials stated that part of OPIC's work culture may need to change to allow for different ways of accomplishing program objectives. In short, OPIC EEO officials believed that the agency may need different ways of measuring success to appreciate the individual strengths of each employee in the various EEO groups.

Barrier Analysis

The HRM staff periodically reviews OPIC's women and minority representation. Written responses to our inquiries stated that the HRM staff monitors OPIC's selection process to ensure there are no systemic conditions that impact the selection of minorities and women. Agency officials acknowledged that formalizing their planning and reporting process could enhance their program.

Workforce Analysis

Table VIII.7 shows representation indexes for combined EEO groups in OPIC as of September 30, 1992. Because of the relatively small number of employees in each category, we combined EEO groups. Also because of the relatively small numbers of employees, we footnoted those occupational categories where the results were significant. When we say that the results were significant, we are asserting that the EEO profile of the agency was so different from the CLF EEO profile for the same PATCO category that this was a major difference and one that was statistically meaningful. Table VIII.8 provides the raw numbers used in our analysis.

**Appendix VIII
Small Agency Case Studies**

Table VIII.7 White and Minority Men and Women Representation at OPIC by PATCO Category as of September 30, 1992

EEO group	Occupational category			
	Professional	Administrative*	Technical*	Clerical*
White men	102	145	31	31
White women	83	57	65	46
Minority men	78	93	64	79
Minority women	189	89	460	364

Note: Numbers show OPIC's PATCO workforce as a percentage of the 1990 national CLF. This type of percentage index indicates the extent to which a particular EEO group was represented in a workforce as compared to the group's representation in CLF. The index can range from 0 to 100+ with 100+ indicating full representation and lower numbers indicating underrepresentation.

*Results were significant at the p=.05 level. The standard criterion for evaluating statistical results is to use a confidence level of .05. This means that if a value would occur by chance five times or less in a random sample of 100 events, then we were comfortable saying that the observed statistical result was a "real" or "true" result.

Source: 1990 CLF data and CPDF data.

Table VIII.8: Numbers of White and Minority Men and Women at OPIC as of September 30, 1992

EEO group	Occupational category			
	Professional	Administrative	Technical	Clerical
White men	9	50	2	1
White women	4	19	5	7
Minority men	1	6	1	1
Minority women	2	7	10	15

Source: CPDF data.

Data Tables

In tables IX.1 and IX.2, we provide the numbers of medium and small agency employees in each of the 10 EEO groups we considered as of September 30, 1984, and September 30, 1992. In tables IX.3 and IX.4, we provide the numbers of employees in the 10 EEO groups at various grade levels as of September 30, 1984, and September 30, 1992. In tables IX.5 and IX.6, we provide the numbers of employees in the 10 EEO groups who were employed, hired, and separated in fiscal years 1984 and 1992. Table IX.7 and IX.8, we provide the numbers of employees in the 10 EEO groups who were promoted in fiscal years 1984 and 1992.

Table IX.1: Numbers of White and Minority Men and Women at Medium Agencies by PATCO Category as of September 30, 1984, and September 30, 1992

PATCO category	Men					Women				
	White	Black	Hispanic	Asian	Native American	White	Black	Hispanic	Asian	Native American
Professional										
1984	4,402	288	77	97	12	1,038	196	37	36	1
1992	4,882	371	128	190	14	1,782	370	68	89	1
Administrative										
1984	3,870	330	104	36	12	1,657	612	75	31	5
1992	5,224	573	175	109	21	2,896	1,160	164	97	19
Technical										
1984	750	229	38	11	4	961	804	53	15	6
1992	719	272	45	23	4	1,155	1,305	77	41	8
Clerical										
1984	156	215	14	9	0	2,146	1,690	129	39	12
1992	149	193	18	12	2	1,345	1,561	121	54	11
Other										
1984	153	263	35	3	1	5	4	1	0	0
1992	96	213	20	1	0	8	55	1	1	0

Source: CPDF data.

**Appendix IX
Data Tables**

Table IX.2: Numbers of White and Minority Men and Women at Small Agencies by PATCO Category as of September 30, 1992

PATCO category	Men					Women				
	White	Black	Hispanic	Asian	Native American	White	Black	Hispanic	Asian	Native American
Professional										
1984	649	51	13	11	3	244	44	8	9	0
1992	703	57	16	16	13	335	69	10	13	2
Administrative										
1984	1,372	163	41	18	11	618	209	18	8	11
1992	1,391	170	46	27	10	755	300	21	24	10
Technical										
1984	35	31	0	0	0	160	163	8	4	1
1992	74	46	2	3	3	234	245	21	12	4
Clerical										
1984	31	62	3	0	0	542	410	26	18	4
1992	29	44	2	1	0	373	364	25	15	11

Note: We did not examine the "other" category for small agencies because it had fewer than 100 employees as of September 30, 1984, and as of September 30, 1992.

Source: CPDF data.

Table IX.3: Numbers of White and Minority Men and Women at Medium Agencies as of September 30, 1984, and September 30, 1992, at Various Grade Levels

Year	Grade	White men	White women	Minority men	Minority women
1984	1-10	1,209	3,665	921	3,150
	11	589	480	133	189
	12	1,445	525	195	181
	13	1,791	485	243	124
	14	1,614	313	143	54
	15	1,611	184	70	18
Total	N/A	8,259	5,652	1,705	3,716
1992	1-10	1,117	3,029	907	3,669
	11	695	630	218	458
	12	1,871	1,054	399	478
	13	1,950	915	347	310
	14	1,940	695	235	121
	15	1,940	454	133	65
Total	N/A	9,513	6,777	2,239	5,101

Source: CPDF data.

**Appendix IX
Data Tables**

Table IX.4: Numbers of White and Minority Men and Women at Small Agencies as of September 30, 1984, and September 30, 1992, at Various Grade Levels

Year	Grade	White men	White women	Minority men	Minority women
1984	1-10	156	857	134	720
	11	119	163	33	60
	12	258	186	68	59
	13	415	152	58	47
	14	563	103	63	25
	15	323	61	29	8
Total	N/A	1,834	1,522	385	919
1992	1-10	170	639	142	769
	11	117	195	43	112
	12	238	212	67	105
	13	383	203	79	63
	14	481	159	58	37
	15	347	84	27	22
Total	N/A	1,736	1,492	416	1,108

Source: CPDF data.

Table IX.5: Numbers of White and Minority Men and Women Employed, Hired, and Separated Among Medium Agency Employees in Fiscal Years 1984 and 1992

EEO group	Fiscal year	Hired	Employed	Separated
White men	1984	1,066	9,331	876
	1992	951	11,070	566
White women	1984	1,083	5,807	828
	1992	903	7,186	491
Minority men	1984	288	1,778	188
	1992	236	2,384	144
Minority women	1984	650	3,746	459
	1992	418	5,203	306

Source: CPDF data.

**Appendix IX
Data Tables**

Table IX.6: Numbers of White and Minority Men and Women Employed, Hired, and Separated Among Small Agency Employees in Fiscal Years 1984 and 1992

EEO group	Fiscal year	Hired	Employed	Separated
White men	1984	179	2,088	197
	1992	197	2,198	146
White women	1984	250	1,566	232
	1992	232	1,699	183
Minority men	1984	29	408	41
	1992	62	458	38
Minority women	1984	123	941	111
	1992	108	1,146	93

Source: CPDF data.

Table IX.7: Numbers of White and Minority Men and Women Promoted at Medium Agencies in Fiscal Years 1984 and 1992 Across All Grades and at Various Grade Levels

Fiscal year	Grade	White men	White women	Minority men	Minority women
1984	1-10	255	959	160	774
	11-12	362	282	60	100
	13-14	490	221	50	44
	15	132	34	8	2
Total	N/A	1,239	1,496	278	920
1992	1-10	231	590	157	753
	11-12	506	369	109	192
	13-14	515	357	69	92
	15	119	61	13	6
Total	N/A	1,371	1,377	348	1,043

Source: CPDF data.

**Appendix IX
Data Tables**

Table IX.8: Numbers of White and Minority Men and Women Promoted at Small Agencies in Fiscal Years 1984 and 1992 Across All Grades and at Various Grade Levels

Fiscal year	Grade	White men	White women	Minority men	Minority women
1984	1-10	32	198	28	121
	11-12	46	62	8	31
	13-14	85	50	7	11
	15	19	5	1	1
Total	N/A	182	315	44	164
1992	1-10	47	167	39	145
	11-12	72	73	12	52
	13-14	82	57	11	18
	15	31	11	4	6
Total	N/A	232	308	66	221

Source: CPDF data.

Comments From the Equal Employment Opportunity Commission

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, DC 20507

MAY 10 1994

Office of
the Chairman

Nancy Kingsbury
Director
Federal Human Resource Management
Issues
United States General Accounting Office
Washington, D.C. 20548

Dear Ms. Kingsbury:

This is in response to your letter dated April 15, 1994, which invited the Equal Employment Opportunity Commission (EEOC) to provide written comments to the General Accounting Office's draft report entitled FEDERAL AFFIRMATIVE EMPLOYMENT: Better Guidance Needed for Small Agencies. We thank you for the opportunity to comment on the report.

As the report correctly states, Management Directive 714 exempted agencies with fewer than 500 employees from writing or submitting multi-year plans and annual reports to eliminate unnecessary paper work. EEOC has prepared a new draft directive that addresses this issue by eliminating the exemption and requiring small agencies to develop and implement multi-year affirmative employment plans. On April 15, 1994, I personally forwarded the draft of the new affirmative employment program directive to Secretaries of cabinet level agencies and heads of smaller agencies for comment. I also directed Ms. Elizabeth M. Thornton, EEOC's Acting Legal Counsel, to issue the draft to EEO Directors of all Federal agencies. The new directive was provided to agencies pursuant to Executive Order 12067 for notice and opportunity to comment.

This change for small agencies is consistent with EEOC's efforts to strengthen its enforcement and oversight of all Federal agencies. We intend for this directive to become effective on October 1, 1994.

See pp. 14 and 15.

Appendix X
Comments From the Equal Employment
Opportunity Commission

I would like to take this opportunity to comment on the following specific items in the report:

Page 3, paragraph three. "For program analysis purposes, the AEP is divided into eight program elements. Under these elements agencies should examine the representation of women and minority employees at the different pay grades and in key jobs."

Comment: The examination of "pay grades and in key jobs" does not specifically relate to the Organization and Resources, Discrimination Complaints and Program Evaluation program elements.

Page 4, paragraph two. "MD-714 exempts agencies with fewer than 500 employees from writing or submitting multi-year plans and annual reports...."

Comment: As stated above, MD-714 does exempt agencies with fewer than 500 employees from its requirements. The directive that will replace MD-714 requires all agencies to develop and implement multi-year affirmative employment plans. The draft directive requires agencies to submit these plans to EEOC for approval and submit updates to their program plans as well as annual accomplishment reports. (This comment also applies to the following sections of the report: page 4, paragraph three; page 7, paragraph three; page 12, paragraphs one and two; and, page 23, paragraph two.)

Page 8, paragraph two. "Each of the 25 medium-size agencies have submitted affirmative employment plans to EEOC, however, most were submitted late, and many were approved without including required work force analysis."

Comment: The new draft directive advises all agencies that if their multi-year plans do not contain all elements required by the MD, including work force analysis, EEOC will disapprove the plan. Additionally, EEOC has an automated tracking system that identifies agencies that have not submitted their plans and annual reports. When agencies are late in submitting the required reports, EEOC's staff calls the agency by telephone to request the reports. If the agency still does not submit its report, EEOC sends letters to agency officials and, ultimately, the agency head. (This comment also applies to page 12, paragraphs one and two.)

Page 9, paragraph two. The reference to Asian males and females and Native American males and females should be revised to read, "Asian American/Pacific Islander males and females and Native American/Alaskan Native males and females."

Now on p. 2.
See comment 1.

See pp. 14 and 15.

See pp. 14 and 15.

Now on p. 6.
See comment 2.

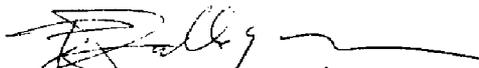
Appendix X
Comments From the Equal Employment
Opportunity Commission

Page 22, paragraph three. "Although small agencies complete the commitment statement, the document does not provide information on an agency's affirmative employment program."

Comment: While it is accurate that under MD-714 small agencies do not submit specific information on their affirmative employment activities for minorities and women, EEOC is able to monitor their affirmative employment progress by reviewing their work force profiles in the Civilian Personnel Data File obtained from the Office of Personnel Management. Additionally, staff in the Affirmative Employment Division and from EEOC's field FAA Units provide technical assistance to all agencies.

If you have any questions or need additional information concerning this matter, please contact Ms. Hilda Rodriguez, Director of Appellate Review Programs, in the Office of Federal Operations at 663-4515 (voice) or 663-4593 (TDD).

Sincerely,



Tony E. Gallegos, Chairman
Equal Employment Opportunity Commission

See pp. 14 and 15.

**Appendix X
Comments From the Equal Employment
Opportunity Commission**

The following are GAO's comments on the Equal Employment Opportunity Commission's letter dated May 10, 1994.

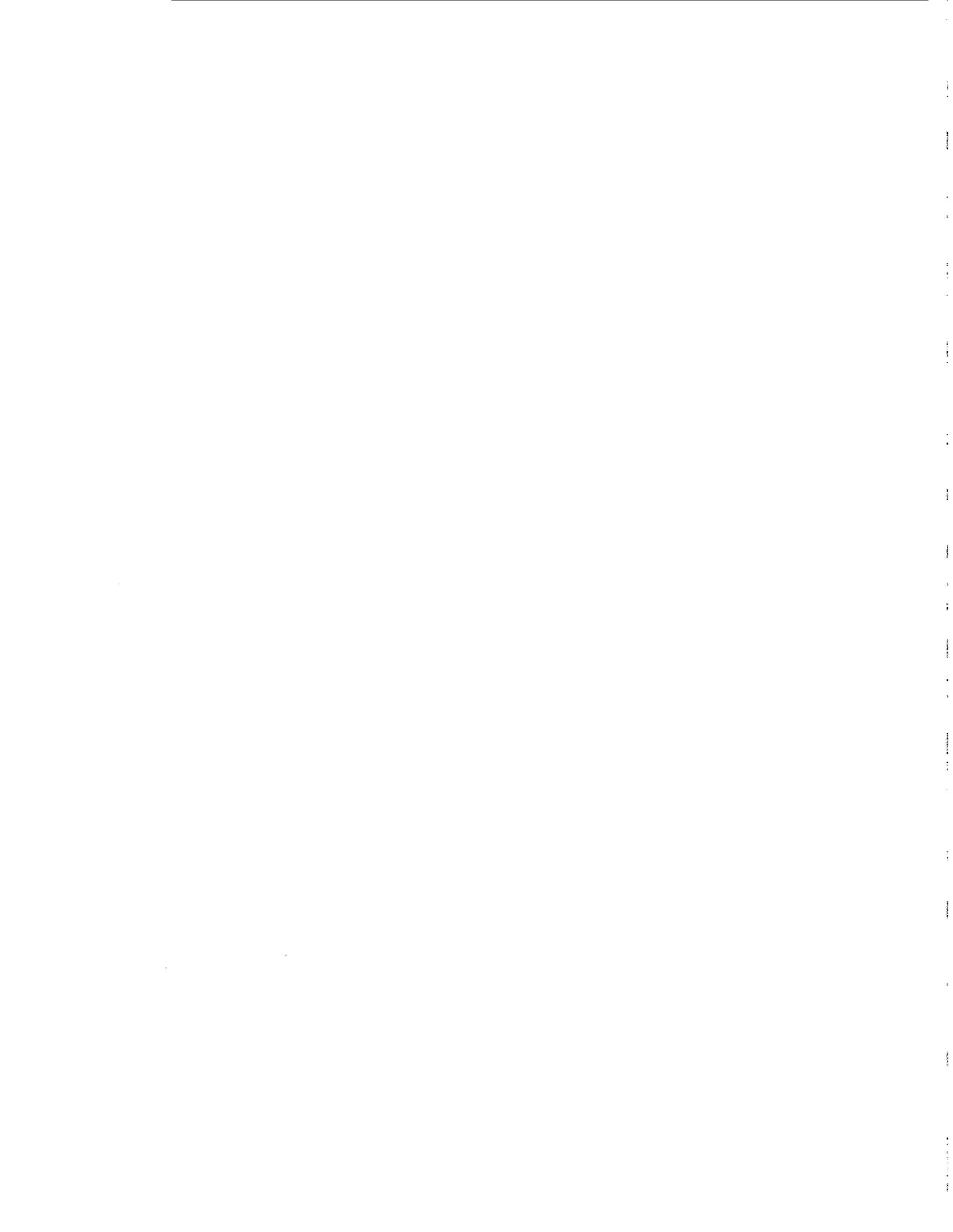
GAO Comments

1. We modified our report (on p. 2) to indicate that the examination of "pay grades and in key jobs" applies to certain of the eight program elements.
2. We added a footnote to our report (on p. 6) explaining our shorthand notation for Asian American Pacific Islanders and Native American/Alaskan Natives.

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