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UNITED STATES GENERAL ACCOUNTING OFFICE
REGIONAL OFFICE
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Mr. Bruce Nestlehutt
Acting Regional Administrator, Region IV
Department of Housing and Urban
Development
50 Seventh Street, N. E.
Atlanta, Georgia 30329



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Dear Mr. Nestlehutt:

We have completed our survey of Equal Employment Opportunity (EEO) training provided in the Department of Housing and Urban Development's Region IV. The survey focused on the kinds of courses offered, selection of participants, and the evaluation of EEO training results.

Although the region was making training available to EEO principals, managers, supervisors and other employees, we believe the program can be strengthened by:

- improving coordination and control of EEO training.
- developing reliable training data, and
- evaluating training results.

We also believe the region should consider the efficiency and economy of providing EEO training within the region--rather than at the Department's training centers in Denver, Colorado and Columbia, Maryland.

BACKGROUND

The need for EEO training is established by the EEO Act of 1972, Executive Order 11478, and the Federal Personnel Manual. The need for training employees--particularly managers, supervisors and individuals directly involved in the EEO program--was also emphasized in Region IV's affirmative action plan.

The categories of training--skills and orientation--were given.

EEO skills training was designed to improve the skills and knowledge of EEO principals--counselors, Federal Women's Program Coordinators, Spanish Speaking Program Coordinators, discrimination complaint investigators--directly involved in the region's EEO program.

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IEO orientation courses were designed to provide knowledge, understanding, and orientation on Federal IEO programs - including laws, procedures, policies, program reports to supervisors, reports and other activities. IEO orientation was usually given as a part of regional and supervisory courses.

In addition, training in personnel administration is given to IEO officials who have not previously received such training.

COMPOSITION AND CONTENT OF IEO TRAINING COURSES

Individuals designated for training did not always receive training because attendance was based largely on an individual's availability rather than on the need for training. Many individuals designated for specific courses in the fiscal year 1975 training needs assessment actually attended the course. This problem was attributed to

- Ingressive training-conscious employees who tend to list courses they would like to take without realistically considering the number of training hours they can fit into one fiscal year.

A tendency to consult training course catalogues before analyzing one's own strengths and weaknesses.

Supervisors who grant training requested rather than carefully evaluate training needs of the whole unit.

Supervisors identified employees needing training through an annual training needs survey. In selected employees, supervisors were instructed to prepare a letter or memorandum and courses based on both organizational needs and individual needs. These letters were used as the basis for the regional training plan. Supervisors were also requested to release employees from duty to attend the needed training.

Managers for training are required to be submitted to the regional training officer for review and approval but this was not always done. Some officers grant their own training through Civil Service Commission or an organizational source and this training was not always reported to the regional training officer for review and approval.

TRAINING IEO OFFICIALS

The regional IEO officer was responsible for ensuring that IEO officials were adequately trained for their duties. However, training needs, approval and attendance were not always provided or monitored by the IEO officer.

Some principals requested training for themselves. Some were requested by the EIO officer. Because training needs were not emphasized or monitored at the national level some principals received extensive training in both EEO and personnel administration while others received none.

For example, the personnel files for 15 EEO officials showed

five had not received either EEO or labor training or training in personnel administration and

six of the remaining 10 had not received training in personnel administration.

We were told that only two of the principals had not received EEO training and that most key officials had received training in personnel administration, but that documentation had not been submitted for inclusion in the personnel file. The regional Southwestern regional director complained to us that the Southern regional coordinator did not attend any training because she did not believe it was necessary and the other's supervisor would not release him for training.

Training supervisors

Some supervisors did not receive EEO training initially because it was not included in a mandatory 120-hour mandatory course at the time they attended. National officials were not certain when the EEO course was added to this course. They were unable to determine the number of supervisors who had or had not received the EEO course because (1) records of training were unreliable and (2) many supervisors received training through a seminar included and may not have received EEO training in other courses. The lack of reliable data is discussed later in this report.

Although some managers and supervisors received EEO training through other courses, there were no controls to insure that all managers and supervisors received at least one course which included a course on EEO. Selections for these courses was not based on individual need for EEO training and the number of employees who received training or those receiving it was not routinely reported.

In the EEO data which included in our survey, records provided by States IV officials showed that 60 supervisors received EEO subject matter education. The records did not show whether these employees were managers or supervisors.

We interviewed 14 supervisors and managers about their EEO training experience. Seven had never received EEO training and seven had received it during the past 4 years. This problem was recognized in the earlier 1976 affirmative action plan, and action items were included to

- hold meetings with supervisors, managers and directors to explain and gain support for the IED program
- review supervisory training for inclusion of IED subject matter training, and
- conduct training sessions in each office on the duties and responsibilities of supervisors and managers in the federal Loren's program.

REL. FOR RELIABLE TRAINING DATA

Because reliable training data were not maintained there was no assurance that those who needed training received it. Neither the regional training officer nor the regional IED officer maintained records identifying training needed or received by IED principals, managers and supervisors.

We were unsuccessful in obtaining reliable training data from the Department's automated management information system because it was incomplete and inaccurate.

The regional training officer is responsible for administering a coordinated regional training program sharing with line management the responsibility for determining training needs and selecting employees for training. The regional IED officer is responsible for assuring that IED principals are adequately trained for their duties.

These officials told us that a major problem in managing IED training is the lack of reliable training data. The primary reason they cited for unreliable data was that offices do not always coordinate training needs through the regional training office. The region has drafted guidelines instructing offices to notify the regional training office of all locally arranged training activities. In October 21, 1988, these guidelines had not been issued.

WLD FOR EVALUATING IED TRAINING

The region had not properly evaluated the results of IED training provided to Section IV employees. Ous did not know its impact on IED.

The Federal Personnel Manual makes agency heads responsible for evaluating the results of training programs to determine whether they are contributing effectively to achieving agency missions and attaining management goals. The Manual urges that, at a minimum, evaluations include analyses of

- the extent to which specific training courses or programs produce desired changes in employee knowledges, skills, attitudes, or performance.
- the extent to which the training courses or programs that are provided cover the areas of greatest need and
- the need for modification in the coverage or conduct of these training courses or programs to meet changing agency needs.

Department instructions require that regional personnel and training organizations identify needs, develop courses and conduct classes. Moreover, they are to evaluate training and participate in department wide evaluations. However, only employee self-evaluations, student critiques were made. The regional training officer said that student critiques were helpful in determining whether students were attentive, increasing the possibility for learning, but they do not provide an objective evaluation of course content or training results.

A Department-wide training evaluation system was implemented during our field work, but it was too early to assess the system's effectiveness in evaluating EEO training in Region IV.

ASSUMING EFFICIENT AND ECONOMICAL TRAINING ARRANGEMENTS

We were told that about 65 percent of the region's training is done at the Department's training centers in Columbia, Maryland and Denver, Colorado. We noted five instances where EEO principals attended EEO training at these centers when the training was available within the region. Three principals traveled from Atlanta, Georgia to Columbia, Maryland to attend training on the affirmative action plan and the LEO act. A fourth principal made the trip for training in LEO counseling. Another principal traveled from Columbia, South Carolina to Denver, Colorado for LEO counselor training.

Both courses were available in Atlanta through the Commission's regional training center. There was ample opportunity for EEO principals to participate in the training since the counseling course was offered 17 times during the period surveyed and the course on the affirmative action plan and EEO act was offered five times.

The transportation cost alone for these five principals was about \$600 greater than it would have been for the same courses in Atlanta. Moreover, only one of the employees would have been entitled to per diem or allowances had the training been provided in Atlanta.

Conclusions and Recommendations

In Region IV, IEO training was made available to IEO principals, managers, supervisors, and other employees. Some offices arranged their own training while others coordinated training through the regional training office. Training was not always reported to the regional training officer for review and approval. Likewise, offices did not always submit records of training for IEO principals through the regional IEO officer. Thus the program lacked coordination and control at the regional level.

Whether the regional training office for the regional IEO office main tained records identifying training needed or received by IEO principals, managers and supervisors. Without reliable training data there was no assurance that those who needed training received it.

The results of IEO training provided to Region IV employees had not been properly evaluated. Therefore its impact on IEO was unknown.

We recommend that the regional administrator

- reevaluate existing procedures for offices within Region IV and develop new procedures as needed to identify persons who should receive IEO training, establish an annual schedule for providing the training, and provide a system for maintaining adequate training records.

- Enforce, at the local levels, systematic procedures which will provide for accurate recording of all necessary training data with copies of records being sent to the regional office for coordination purposes.

- Assess the impact of IEO training on the achievement of agency IEO goals.

- Secure the use of IEO training courses available within the region whenever feasible in the interest of efficiency and economy.

We appreciate the cooperation and assistance extended to us by your staff during this survey.

Sincerely yours

MARVIN COLBS

Marvin Colbs
Regional Director