



Highlights of [GAO-09-639](#), a report to the Chairman, Committee on Homeland Security, House of Representatives

Why GAO Did This Study

The federal government is faced with a workforce that is becoming increasingly eligible for retirement. GAO has reported that it is important for federal agencies, including the Department of Homeland Security (DHS), to use available flexibilities to acquire, develop, motivate, and retain talented individuals who reflect all segments of society and our nation's diversity. The Equal Employment Opportunity Commission's (EEOC)

Management Directive (MD) 715, provides that in order to attract and retain top talent, federal agencies are to identify barriers to equal employment opportunity (EEO) in the workplace, execute plans to eliminate barriers, and report annually to EEOC.

In response to a request to determine the extent to which DHS has taken steps to identify and address barriers to EEO and how DHS oversees and supports component agencies in identifying and addressing barriers, GAO reviewed DHS's MD-715 reports and EEOC guidance on MD-715 and interviewed officials from DHS's civil rights and human capital offices responsible for EEO.

What GAO Recommends

GAO recommends that DHS (1) develop a strategy to regularly include employee input in identifying potential barriers to EEO and (2) establish interim milestones for completing planned activities to address identified barriers. DHS agreed with our recommendations.

[View GAO-09-639 or key components.](#)
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EQUAL EMPLOYMENT OPPORTUNITY

DHS Has Opportunities to Better Identify and Address Barriers to EEO in Its Workforce

What GAO Found

DHS has generally relied on workforce data and has not regularly included employee input from available sources to identify "triggers," the term EEOC uses for indicators of potential barriers. GAO's analysis of DHS's MD-715 reports showed that DHS generally relied on workforce data to identify 13 of 15 triggers, such as promotion and separation rates. According to EEOC, in addition to workforce data, agencies are to regularly consult a variety of sources, such as exit interviews, employee groups, and employee surveys, to identify triggers. Involving employees helps to incorporate insights about operations from a frontline perspective in determining where potential barriers exist. DHS does not consider employee input from such sources as employee groups, exit interviews, and employee surveys in conducting its MD-715 analysis. Data from the governmentwide employee survey and DHS's internal employee survey are available, but DHS does not use these data to identify triggers. By not considering employee input on DHS personnel policies and practices, DHS is missing opportunities to identify potential barriers. Once a trigger is revealed, agencies are to investigate and pinpoint actual barriers and their causes. In 2007, through its departmentwide barrier analysis, DHS identified four barriers: (1) overreliance on the Internet to recruit applicants, (2) overreliance on noncompetitive hiring authorities, (3) lack of recruitment initiatives that were directed at Hispanics in several components, and (4) nondiverse interview panels.

GAO's analysis of DHS's 2007 and 2008 MD-715 reports showed that DHS has articulated planned activities to address identified barriers, has modified nearly all of its original target completion dates by a range of 12 to 21 months, and has not completed any planned activities; although officials reported completing other activities in fiscal year 2007 and 2008 associated with its EEO program. Nearly half of the planned activities involve collaboration between the civil rights and human capital offices. DHS said that it modified the dates because of staffing shortages. In order to ensure that agency programs are effectively and efficiently implemented, it is important for agencies to implement internal control activities, such as establishing and tracking implementation goals with timelines. This allows agencies to pinpoint performance shortfalls and gaps and suggest midcourse corrections. DHS has not developed project plans with milestones beyond what is included in its MD-715 report and its *Human Capital Strategic Plan*. These documents include only the anticipated outcomes and target completion dates, not the essential activities needed to achieve the outcome. Identifying the critical phases of each planned activity necessary to achieve the intended outcome with interim milestones could help DHS ensure that its efforts are moving forward and manage any needed midcourse corrections, while minimizing modification of target dates.

DHS uses a variety of means to oversee and support components, including providing written feedback on draft reports to components that are required to prepare their own MD-715 reports, conducting program audits, and convening a council of EEO directors from each of the components.