

GAO

Report to the Chairman, Committee on
Governmental Affairs, U.S. Senate

May 1991

**FEDERAL
AFFIRMATIVE ACTION**

**Better EEOC Guidance
and Agency
Analysis of
Underrepresentation
Needed**



144046

General Government Division

B-243473

May 10, 1991

The Honorable John Glenn
Chairman, Committee on
Governmental Affairs
United States Senate

Dear Mr. Chairman:

This report responds, in part, to your request for a review of the federal affirmative employment program. As agreed with the Committee, our objectives during the first phase of this assignment were to obtain information concerning (1) the Equal Employment Opportunity Commission's (EEOC) major occupation work force data and analysis requirements for agency multiyear affirmative employment plans and (2) agency compliance with the requirements. Also as agreed, we are reporting on what the work force data contained in agency plans showed and how those data could be used to assess progress towards achieving affirmative employment goals.

As agreed, we are working on other aspects of your request and will report separately on that work.

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 minorities and women in the work force. The EEOC is responsible for providing agencies with guidance on their affirmative employment programs. EEOC's Management Directive 714, issued in October 1987, assigns agency heads responsibility for ensuring compliance with affirmative employment program instructions issued by EEOC, establishing agencywide objectives, submitting multiyear affirmative employment program plans, and ensuring that all senior executive service managers are held accountable for achieving affirmative action objectives and requirements.

In Management Directive 714, EEOC requires agencies to prepare multi-year plans and to update them and report accomplishments annually. As part of the multiyear plan development, each agency is to analyze its work force, comparing the representation of EEO groups for various occupational and grade/pay categories in the agency's work force to the representation of the same occupational groups in the appropriate

civilian labor force (CLF).¹ The CLF represents persons 16 years of age or over, excluding those in the armed forces, who are employed or who are seeking employment. On the basis of their analyses, agencies are to take steps to address barriers and problems that restrict equal employment opportunities.

EEOC annually provides each agency with information on its work force from the Office of Personnel Management's (OPM) Central Personnel Data File (CPDF) for Professional, Administrative, Technical, Clerical, and Other (PATCO) occupational categories and grade groupings.² Management Directive 714 instructs each agency to analyze its work force by (1) PATCO occupational categories, (2) grade groupings, and (3) major occupations and to include these analyses in multiyear affirmative employment plans. Agencies not covered by the CPDF must submit analyses using agency-generated work force data. EEOC provides each agency with CLF data, which the agency is to use as a comparison base with its own work force data. EEOC evaluates the effectiveness of an agency's affirmative employment program efforts by reviewing annual changes in the agency's work force.

Approach

To determine agency compliance with EEOC reporting requirements,³ we reviewed the most recent multiyear affirmative employment plans, covering fiscal years 1988 through 1992, for the 34 largest federal agencies. (These agencies, in fiscal year 1988, collectively employed about 98 percent of the federal work force.) At the Committee's request, we also included the National Archives and Records Administration's affirmative employment plan in our review. We reviewed each of these multi-year plans for compliance with EEOC reporting requirements.

Because work force data contained in agency multiyear plans generally were from fiscal year 1987, we did not use these data to assess women and minority representation levels within agencies. Where work force data were reported, we used the information to demonstrate techniques

¹The CLF data were derived by EEOC from the 1980 Census EEO tape by matching federal occupational series with the appropriate counterpart employment occupation(s) in the EEO tape occupation listing.

²Grade groupings are the combination of one or more specific employment grades, such as 1 through 4 or 13 through 15. EEOC and OPM urge agencies to analyze work forces using grade groupings to ensure that the number of employees on which percentages in any category of employment are based is large enough to permit reasonable comparisons with the CLF.

³Because the Department of State's plan had not been approved by EEOC as of March 1991, we omitted that agency's plan from our analysis.

for analyses of major occupation work force data. As agreed, we will issue a separate report using more current data to assess women and minority representation levels.

In demonstrating our suggested analyses of major occupation work force data, we used representation indexes to show the extent to which a particular EEO group is represented in a work force as compared to the group's representation in the CLF. The index can range from 0 to 100 plus; 100 indicates full representation, and lower numbers indicate underrepresentation. According to EEOC standards, underrepresentation exists if the percentage rate at which an EEO group is represented in an agency's work force is less than the rate at which the group is represented in the CLF (as identified in the most recent census). The CLF represents, in general terms, all persons who are employed or seeking employment. Severe underrepresentation has been defined by EEOC as representation indexes below 50 (less than 50 percent of the CLF rate).

EEOC's current guidance does not use the term underrepresentation but instead uses new terms—conspicuous absence and manifest imbalance. Conspicuous absence refers to situations in which an EEO group is nearly or totally nonexistent in an agency's work force. Manifest imbalance refers to situations in which an EEO group's representation is substantially below its representation in the appropriate civilian labor force. Because numerical criteria for "substantially" and "nearly or totally nonexistent" are not established, we used EEOC's earlier term (severe underrepresentation) and definition (less than 50 percent of the CLF rate).

We recognize that, because of the age of the data, the 1980 CLF data may not reflect the various EEO groups' current overall representation in the labor force. However, until the results of the 1990 census become available, EEOC officials said that the 1980 CLF data is the best information currently available.

Our work was done from February 1991 to March 1991, in accordance with generally accepted government auditing standards. As you requested, we informally discussed the results of our review with EEOC officials; their views are presented at the end of this letter. Additional details on our objectives, scope, and methodology are presented in appendix I.

Results in Brief

Twenty-seven of the 35 agencies whose plans we reviewed complied with EEOC's requirement that they identify major occupations in their multiyear affirmative employment plans; however, the agencies' bases for selecting these occupations varied. Although Management Directive 714 defines major occupations as "mission oriented occupations or other occupations with 100 or more employees," EEOC officials told us that their intent was for agencies to designate as major occupations only jobs that lead to senior level positions. Four agencies cited career paths or advancement potential as the primary basis for their designations. Most selected as major occupations either (1) all jobs with over 100 employees or (2) jobs with the highest numbers of employees.

Eighteen of the 35 agencies complied with EEOC's requirement that they include a work force analysis of major occupations in their plans. Six of the 17 agencies that did not comply with this requirement told us they believed that providing work force analyses by more general occupational categories, such as PATCO, was sufficient to meet EEOC's requirement. EEOC approved all 35 of these plans even though the required major occupation work force analyses were not provided in 17 cases. EEOC officials told us they approved the plans without these analyses in order to expedite the implementation of otherwise appropriate affirmative employment plans. However, implementation had already been delayed because many of the agencies' plans had been submitted late, and EEOC review and approval took several months.

Most of the agencies that complied with EEOC major occupation reporting requirements provided to EEOC actual work force numbers or percentages of employees in their major occupations with little or no analysis of the significance of what the data reflected. More analysis of these data by agencies could help target specific areas for improvement and develop and implement corrective actions.

We computed and compared representation indexes for EEO groups within major occupations to the appropriate representation levels in the CLF. We found that these additional analysis could help agencies (1) identify EEO groups that may require special attention and (2) judge the significance of the need by estimating the number of individuals needed to attain full representation. Also, by comparing and compiling information on occupations across agencies, EEOC could promote the identification and sharing of successful affirmative employment strategies among agencies.

Additional data and analyses of major occupations by grade level, if requested by EEOC, would require agencies to review women and minority representations at higher versus lower grades within a particular position. According to an EEOC official, Management Directive 714's intent is to focus agencies' attention on the upward internal movement of their work force. Although EEOC requires each agency to submit summary analyses by grade groupings for its total work force, it does not require data or analysis of major occupations by grade level. As a result, agencies are not required to identify and address representation disparities that may exist between upper and lower grades of major occupations.

EEOC acknowledged that its guidance on preparing multiyear affirmative employment plans is not as clear as it could be and that the lack of clarity may contribute to the time it took to review and approve the plans. In addition, the agency believes that grade-level data by major occupations and the additional analyses we describe could benefit the federal affirmative employment program. EEOC officials told us they will examine similar analyses for EEOC use when they rewrite the guidance for the next planning cycle.

Agencies Not in Compliance With EEOC Requirements

Twenty-seven of the 35 agencies met EEOC's requirement to identify major occupations in their affirmative employment plans, and 8 did not. Eighteen agencies included in their plans the required work force analyses of major occupations. Seventeen agency plans did not include such analyses. On the basis of our review of agency plans and discussions with EEOC and agency officials, we believe that agencies do not understand the type and amount of data required with respect to major occupations and that EEOC guidance should be made clearer.

Affirmative Employment Plan Data Requirements

EEOC's Management Directive 714 requires agencies to comprehensively analyze the current status of affirmative employment program elements. The analyses are to address such elements as work force composition, recruiting, hiring, promotions, and separations. To assist in the work force analyses, EEOC provides agencies with work force information by PATCO employment categories obtained from the OPM's CPDF,

which covers most federal employees.⁴ EEOC instructs those agencies not covered by the CPDF, such as the U.S. Postal Service and the Tennessee Valley Authority, to use agency-generated work force data.

Concerning the work force composition analyses, Management Directive 714 states the following:

“Agencies should provide EEOC with its own summary analysis of the CPDF data by PATCO category, and by grade groupings. Agencies must also submit to EEOC a work force analysis by major occupational series. Agencies should analyze work force data and identify employment trends for action and further study. Agencies should use this element to select areas for affirmative employment efforts.”

According to the directive, the analysis should include work force representation of EEO groups as well as a comparison of each minority group’s employment in each PATCO category and major occupation to each group’s representation in the appropriate CLF.

Management Directive 714 defines major occupations as “mission oriented occupations or other occupations with 100 or more employees.” According to an EEOC official, EEOC purposely left the definition of “mission oriented” to the discretion of the agencies because each agency has a different mission. However, according to EEOC officials, EEOC’s intent was to focus agency affirmative employment efforts on those occupations with advancement potential to senior level positions.

Major Occupations Not Always Identified; Most Were Not Based on Advancement Potential

Twenty-seven of the 35 agencies complied with EEOC requirements and identified major occupations in their multiyear affirmative employment plans. Eight did not. Of those that did only four agencies cited career paths and/or advancement potential as their basis for identifying the major occupation.

Agencies’ criteria for selecting occupations as “major” varied. For example, officials at eight agencies explained that they initially identified all occupations with more than 100 employees or their most populous occupations and from these selected the occupations considered to be critical to the agency’s mission. Officials at seven agencies told us they chose as major occupations all jobs with more than 100 employees,

⁴The CPDF is based on and updated monthly with personnel action information submitted to OPM by federal agency appointing offices. The file includes information on individual identification such as social security number and date of birth; employee characteristics such as gender and minority status; and job characteristics such as pay plan grade, salary, occupational series, and supervisory status.

and officials at five agencies said they used their agencies' most populous occupations as major occupations. Officials in two agencies told us they identified as major occupations only "mission oriented" jobs. One agency did not have readily available information on how jobs were selected as major occupations. EEOC officials agreed that Management Directive 714's reference to "mission oriented occupations" should be made clearer to better ensure occupations with advancement potential to senior level positions are included as major occupations in the agencies' plans.

Plans Approved Without Required Analysis of Major Occupations

In addition to agencies' confusion concerning the definition of major occupations, there also appears to be confusion over whether the work force analysis described in Management Directive 714 is a requirement. For example, officials at six agencies told us they did not comply with the requirement because they believed providing work force analyses of the broader PATCO occupational categories and/or combined analyses of specific jobs such as scientists and engineers was sufficient. These officials also stated that they had discussed this with EEOC and obtained its concurrence. We found that EEOC approved each of these plans without the required work force analyses. EEOC officials agreed that Management Directive 714 requires agencies to include in their affirmative employment plans a work force analysis of major occupations. Although not stated in the directive, EEOC officials explained that the Commission has the discretion to waive this requirement if deemed appropriate by program officials.

As shown in table 1, a total of 17 agencies did not include in their affirmative employment plans a work force analysis by major occupations. An EEOC official told us that EEOC reviews affirmative employment plans on a case-by-case basis. According to the officials, EEOC had, during the review process, concluded that for each of these 17 agency plans, adherence to the work force analysis requirement would result in undue delays in the approval and implementation of otherwise appropriate affirmative employment plans. The officials said EEOC approved these plans in an attempt to prevent more delays. However, table 1 also shows that in several cases agency plans had been submitted over 1 year after the date they were due, and several months had passed between EEOC's receipt and final approval of agency affirmative employment plans.

Table 1: Selected Information From Agencies' Fiscal Year 1988-1992 Affirmative Employment Plans Concerning Major Occupations

Agency	Date received	Date approved	Major occupations identified		Work force analysis of major occupations	
			Yes	No	Yes	No
Plans due 2/15/88						
Agency for International Development	12/08/89	03/13/90	x			x
Defense Contract Audit Agency	06/27/89	04/06/90	x		x	
Defense Investigative Service	11/17/88	05/17/90	x		x	
Defense Mapping Agency	08/17/88	01/13/89	x		x	
EEOC	07/24/89	02/10/90	x		x	
Federal Deposit Insurance Corp.	09/14/88	03/05/90	x			x
National Archives & Records Admin.	03/11/88	10/25/88	x		x	
Nuclear Regulatory Commission	11/16/88	04/06/90	x		x	
Smithsonian Institution	09/19/88	03/13/89		x		x
State	12/14/88	^a				
U.S. Information Agency	07/28/89	03/13/90	x			x
Plans due 4/15/88						
Agriculture	04/12/88	01/12/89	x		x	
Air Force	04/15/88	10/18/88		x		x
Army	06/15/88	01/13/89		x		x
Army/Air Force Exchange	06/27/88	11/10/88		x		x
Commerce	06/13/88	08/31/88	x		x	
Defense Logistics Agency	01/03/89	06/20/90	x			x
Education	01/30/89	05/08/89	x			x
Energy	09/08/88	11/04/88	x		x	
Environmental Protection Agency	04/05/88	10/25/88	x		x	
General Services Administration	10/18/88	07/27/89	x		x	
Government Printing Office ^b	07/15/88	10/29/90	x			x
Health & Human Services	01/08/89	01/23/89	x		x	
Housing & Urban Development	12/22/89	04/06/90	x		x	
Interior	08/29/88	09/26/88	x			x
Justice	07/25/89	03/15/90	x		x	
Labor	03/11/88	10/23/89		x		x
National Aeronautics & Space Admin.	02/02/88	05/21/90		x		x
Navy	08/22/88	09/20/88	x		x	
Office of Personnel Management	09/01/88	02/14/89	x		x	
Small Business Administration	07/15/88	02/08/89	x		x	
Tennessee Valley Authority	04/13/89	09/26/90		x		x
Transportation	01/03/89	10/09/90	x			x
Treasury	12/30/88	04/28/89	x			x

(continued)

Agency	Date received	Date approved	Major occupations identified		Work force analysis of major occupations	
			Yes	No	Yes	No
U.S. Postal Service	03/11/88	10/05/90		x		x
Veterans Affairs	07/13/88	10/31/88	x		x	
Totals			27	8	18	17

Note: Dates included in this table were provided by EEOC.

^aPlan not yet approved.

^bLegislative branch agency, thus not required to submit plan.

The amount of time between receipt and approval for the 17 plans submitted without required work force data ranged from approximately 1 month (Interior) to approximately 31 months (U.S. Postal Service). The average receipt/approval times for these agencies was 13 months. EEOC officials said that they had not analyzed the reasons for the time it took. However, they said they believed that, in part, the time it took to review and approve plans was due to the discussions and negotiations caused by Management Directive 714's lack of clarity.

Late Submission of Affirmative Employment Plans

Twenty-nine of the 35 agencies we reviewed that were required to submit affirmative employment plans were late in submitting their plans to EEOC for approval. Of these 29, 6 submitted plans within 4 months after the due date, 8 submitted plans between 4 and 8 months late, 9 submitted plans between 8 and 12 months late, and 6 agencies were over 1 year late submitting their plans to EEOC.

An EEOC official told us that agencies have cited (1) personnel changes in agency EEO offices and (2) EEO data not being readily available as reasons for late submissions. However, EEOC officials stated that they had not analyzed the reasons for late plan submissions.

Options for Improving Data Analysis

The 18 agencies that complied with EEOC major occupation work force analysis requirements included in their plans numbers and/or percentages of women and minorities within certain positions in an agency. However, additional analysis by agencies of these numerical data could be used to develop representation indexes and estimates of the number of additional individuals needed to attain full representation in major occupations. By comparing representation indexes of major occupations

among agencies and providing this information to them, EEOC could promote information sharing about successful affirmative employment strategies among agencies with similar occupations. Also, major occupation data by grade level are needed to identify and to help eliminate those barriers that prevent the upward movement of individuals within major occupations.

We used major occupation work force data contained in agency fiscal year 1988 through 1992 affirmative employment plans to develop examples of the types of additional analysis that could be done to improve the federal affirmative employment program. The following sections highlight key areas about which agency EEO offices and EEOC could keep informed through additional analyses.

Representation Index Analysis Allows More Meaningful Comparisons

Of the 18 agencies that identified major occupations and supplied the corresponding work force analysis, the General Services Administration (GSA) was one of four agencies that cited career paths and/or advancement potential as a basis for identifying major occupations. Using the numerical data contained in its plan we compared GSA's work force with the appropriate CLF rates. Table 2 shows representation indexes for each EEO group by major occupation for GSA. This representation index, used by EEOC and OPM, indicates the extent to which a particular EEO group is represented in the agency's work force as compared to that group's representation in the appropriate civilian labor force. Transforming agency raw EEO profile data into these indexes allows for a more meaningful comparison to the CLF.

Table 2: Minority and Female Representations at the General Services Administration by Major Occupation

Job series	Female		Black		Hispanic		Asian		American Indian	
	Total	White	Male	Female	Male	Female	Male	Female	Male	Female
Accountant	107	88	288	304	21	78	35	40	214	685
Accounting Technician	170	167	73	238	37	57	16	44	160	381
Attorney	76	77	379	105	0	86	0	0	0	0
Auditor	67	60	224	131	0	46	103	93	0	0
Building Management Specialist	80	64	313	209	93	98	13	27	88	253
Computer Specialist	98	80	277	268	73	26	171	98	0	394
Contract and Procurement Specialist	193	128	185	763	23	112	17	320	28	159
Federal Protective Officer	53	27	603	171	92	93	59	0	57	0
Realty Specialist	135	121	135	257	24	120	42	220	141	0

Note 1: Figures show agency's major occupation work force as a percentage of the national civilian labor force (CLF). This type of percentage index, called a representation index by EEOC and OPM, indicates the extent to which a particular EEO group is represented in a work force as compared to the group's representation in the CLF. The index can range from 0 to 100+ with 100 indicating full representation and lower numbers indicating underrepresentation.

Note 2: Numbers in bold indicate areas of severe underrepresentation (less than 50 percent).

This type of analysis can be used to identify those EEO groups in major occupations that may be targeted for special initiatives. Indexes range from 0 to 100 plus; 100 indicates full representation and lower numbers indicate underrepresentation. Although some agencies did this type of analysis, the majority of agency plans did not reflect the use of representation indexes to analyze major occupation work force data.

While the analysis depicted in table 2 identifies potential problem areas, it serves only as a starting point for directing emphasis to specific occupations and EEO groups. Additional information on initiatives already proven successful in agencies with common occupations could assist other agencies in the design and implementation of corrective actions.

Analysis of Common Occupations Could Promote Information Sharing

Table 3 compares representation indexes of common major occupations among agencies. Such information could be used to identify relatively high and low representation indexes for the same jobs across the federal government. Additional analysis could possibly enable agencies doing well to help those not doing as well. For example, a certain EEO group might be fully represented in a particular occupation at one agency, but underrepresented in the same occupation at another agency. As shown in table 3, the Department of Energy has a representation index of 114 for hispanic males in its computer specialist occupation, while the

Department of Commerce has a hispanic male index of 36 for the same position. The agency with the relatively lower representation index might be able to adopt initiatives or strategies that the other agency had already found to be successful for attaining full representation in that particular occupation. In other cases, specific practices might be discarded because other agencies had already found those initiatives ineffective. By compiling such representation information by common occupations, EEOC could facilitate information sharing among agencies.

Table 3: EEO Group Representation at Selected Agencies With Common Major Occupations

Job series	Agency	Female		Black		Hispanic		Asian		American Indian	
		Total	White	Male	Female	Male	Female	Male	Female	Male	Female
Computer	AGR	115	109	132	185	62	38	95	216	219	118
Specialist	VA	96	87	189	177	95	83	111	149	19	76
	COM	106	93	195	220	36	62	167	255	63	0
	DOE	85	87	101	76	114	61	49	51	166	153
	EPA	100	80	120	253	57	0	183	388	0	235
	GSA	98	80	277	268	73	26	171	98	0	394
	HHS	121	110	148	230	22	38	74	196	219	176
	HUD	94	58	442	404	62	88	159	0	0	335
	DMA	90	75	246	199	28	120	108	153	0	0
	OPM	118	109	308	275	0	0	120	0	0	0
Attorney	SBA	102	105	172	54	116	88	59	179	476	0
	EEOC	154	112	635	558	201	294	47	35	95	154
	VA	68	70	95	80	79	60	40	0	243	0
	DOE	84	89	188	90	101	55	0	0	0	0
	EPA	130	131	148	141	15	129	19	103	0	0
	DOJ	86	95	107	50	60	35	16	18	48	15
	GSA	76	77	379	105	0	86	0	0	0	0
	HUD	83	82	197	137	35	67	0	0	0	0
Accountant	EPA	99	72	309	335	67	126	85	129	686	0
	HUD	127	43	812	909	0	131	59	178	710	385
	GSA	107	88	288	304	21	78	35	40	214	685
	DOE	89	83	278	155	133	32	57	129	0	0
Auditor	DCAA	101	92	153	132	85	61	146	283	90	15
	EPA	79	64	229	276	55	0	70	53	0	0
	HUD	61	49	187	156	62	89	66	90	0	0
	GSA	67	60	224	131	0	46	103	93	0	0

Note 1: Figures show agency's major occupation work force as a percentage of the national civilian labor force (CLF). This type of percentage index, called a representation index by EEOC and OPM, indicates the extent to which a particular EEO group is represented in a work force as compared to the group's representation in the CLF. The index can range from 0 to 100+ with 100 indicating full representation and lower numbers indicating underrepresentation.

Note 2: Numbers in bold indicate areas of severe underrepresentation (less than 50 percent).

Number of Minorities and Women Needed to Attain Full Representation in Major Occupations

Although representation indexes are a valuable tool for assessing an agency's work force, agencies may benefit further from knowing how many additional members of an EEO group would be needed to reach full representation. Actual work force data such as those used to develop table 3 can also be computed to determine the additional numbers needed.

We used EEOC and OPM guidance to estimate the additional numbers of minorities and women agencies would need to attain across-the-board representation in major occupations. In many instances, an agency would need only a few more individuals from an EEO group to achieve full representation because that group's representation in the CLF was small. In other instances, the numbers were larger because the group's representation in the CLF was larger. Table 4 shows by agency, major occupation, and EEO group the numbers needed to make up representation shortfalls.

Table 4: Number of Individuals Needed to Reach Full Representation in Agency Major Occupations

Job series	Agency	Number needed to reach full representation									
		Female		Black		Hispanic		Asian		American Indian	
		Total	White	Male	Female	Male	Female	Male	Female	Male	Female
Computer Specialist	AGR ^a										
	VA	59	55	0	0	2	3	0	0	4	1
	COM ^a										
	DOE	19	13	0	3	0	2	2	1	0	0
	EPA ^a										
	GSA ^a										
	HHS	25	0	0	0	64	25	8	0	0	0
	HUD ^a										
	OPM ^a										
	DMA	19	18	0	0	5	0	0	0	1	1
Attorney	SBA ^a										
	EEOC	4	0	0	0	0	0	7	4	0	0
	VA	61	47	1	3	3	3	9	7	0	1
	DOE	18	10	0	1	0	2	8	4	1	1
	EPA ^a										
	DOJ	202	59	0	63	38	32	97	43	6	5
	GSA ^a										
	HUD ^a										
Accountant	EPA ^a										
	HUD ^a										
	GSA ^a										
	DOE	16	13	0	0	0	2	3	0	1	1
Auditor	DCAA	124	97	0	0	16	22	0	0	1	5
	EPA ^a										
	HUD ^a										
	GSA ^a										

^aData not provided in agency affirmative employment plan to do this analysis.

For each job where the agency provided the number of minority and female employees, we compared these numbers to our estimates of the numbers needed for full representation.⁵ For example, since black males make up 2.33 percent of the CLF's professional labor force, we applied, for each agency separately, that percentage to the total number of

⁵We were unable to do this analysis in those instances where agencies provided work force percentages in lieu of actual numbers of individuals in a particular major occupation.

accountants employed.⁶ The resulting number was the estimated number of black male accountants needed for full representation. We then compared the fully representative number with the number of black male accountants actually employed. The differences, where there were shortfalls, appear in table 4.

Major Occupation Data by Grade Level Needed

According to EEOC, the major thrust for Management Directive 714 is the elimination of practices, procedures, and policies that operate to hamper internal upward movement of women and minorities. We believe that to accurately assess whether agencies are meeting this objective, EEOC should require agencies to analyze and report grade level data by major occupation.

EEOC's Management Directive 714 does not require agencies to identify women and minority representations at upper versus lower grades within major occupations. Only four of the 35 plans we reviewed provided major occupation data segregated by grade level. By not identifying major occupation representation levels by grade level, agencies may overlook the fact that women and minorities are concentrated at lower grade levels in these positions. Agency awareness of these situations, brought about by analysis of grade data within these jobs, could lead to the identification and subsequent elimination of barriers preventing the upward movement of individuals within major occupations.

Conclusions

The federal affirmative employment program needs to be improved to more precisely identify the underrepresentation of minorities and women at upper grade levels in major occupations. Management Directive 714's definition of "major occupations" is not in accordance with EEOC's intent and, therefore, agencies are not reporting what EEOC thinks they should. Many agencies have submitted plans significantly late and without the required work force analysis of major occupations; however, EEOC has approved plans submitted without this information.

EEOC does not require, nor do most agencies incorporate in their plans, representation indexes or estimates of the number of people needed to

⁶EEOC uses the PATCO-grouped CLF data as the base against which it computes work force data that agencies align by major occupation. It also instructs agencies to use the PATCO-grouped CLF data as the base of comparison. EEOC permits agencies to use, where available, occupation-specific CLF data for comparison purposes (such as accountants or attorneys). For demonstration purposes, however, we show only the comparison with the PATCO-grouped CLF data.

attain full representation in major occupations. By comparing representation indexes of major occupations among agencies and providing this information to agencies, EEOC could promote information sharing on what works and what does not among agencies with similar occupations.

Although EEOC's current focus is to remove barriers preventing the internal upward movement of women and minorities, the agency does not require agencies to analyze and report major occupation work force data by grade level. Such information is needed to identify and help eliminate such barriers.

Recommendations to the Chairman, EEOC

We recommend that the EEOC strengthen emphasis of the federal affirmative employment program on improving minority and female representation in upper grade levels by

- including in its revised directive better guidance on what constitutes a major occupation;
- expanding agency data collection and analysis requirements to include major occupation work force data by grade level or grade groupings and the systematic use of representation indexes to analyze work force data and estimate the number of people needed to attain full representation;
- withholding plan approval until all required data and analyses are included;
- analyzing the time agencies took to prepare and EEOC to approve affirmative employment plans, develop standards for completing these processes, and hold agencies and EEOC officials accountable for meeting the standards; and
- compiling major occupation work force data by agency, identifying agencies with full EEO representations and successful affirmative employment strategies, and sharing this information with other agencies with common occupations.

Agency Views

EEOC officials generally agreed with our findings, conclusions, and recommendations. They said that the Commission was open to ideas for improving its federal sector operations as evidenced by the program reorganization approved by the EEOC Chairman, effective December 21, 1990.

In this regard, EEOC officials agreed that EEOC's guidance for selecting major occupations is not in accordance with the Commission's intent.

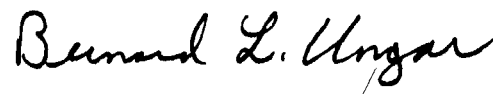
They stated that a new directive will be drafted that will clearly specify reporting requirements for agency affirmative employment plans for women and minorities. EEOC officials also believe that the additional analysis suggested by our data tables are helpful analytical tools and that EEOC will examine similar analyses for its use.

EEOC officials added that although they do not currently require agencies to analyze and report major occupation data by grade level, they plan to explore this and other issues raised in this report.

As arranged with the Committee, unless you publicly release its contents earlier, we plan no further distribution of this report until 5 days from the date of this letter. At that time, we will send copies to the Chairman, EEOC, and other interested parties.

The major contributors to this report are listed in appendix II. If you have any questions on this report, please contact me at (202) 275-5074.

Sincerely yours,



Bernard L. Ungar
Director, Federal Human
Resource Management Issues

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Abbreviations

AGR	Department of Agriculture
CLF	Civilian Labor Force
COM	Department of Commerce
CPDF	Central Personnel Data File
DCAA	Defense Contract Audit Agency
DMA	Defense Mapping Agency
DOE	Department of Energy
DOJ	Department of Justice
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
EPA	Environmental Protection Agency
GSA	General Services Administration
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
OPM	Office of Personnel Management
PATCO	Professional, Administrative, Technical, Clerical, and Other
SBA	Small Business Administration
VA	Department of Veterans Affairs

Objectives, Scope, and Methodology

As agreed with the Committee, the objectives of our review were to obtain information concerning (1) EEOC's major occupation work force data requirements for agency multiyear affirmative employment plans and (2) agency compliance with these requirements. We also agreed to report on what the data contained in agency plans showed and to determine the usefulness of the data for assessing an agency's progress toward achieving affirmative employment goals.

We reviewed relevant EEO statutes, regulations, and guidance issued by EEOC. We interviewed officials in EEOC's Office of Federal Operations, which is responsible for reviewing and approving agencies' affirmative employment plans. In addition, we interviewed agency EEO officials to determine the procedures followed and criteria used to develop affirmative employment plans.

We requested fiscal year 1988 through 1992 multiyear affirmative employment plans for the 35 largest federal agencies, which employed approximately 98 percent of the federal work force. EEOC provided us with plans for 34 of these 35. Because the Department of State's plan had not been approved as of March 1991, we omitted State from our review. At the Committee's request, we requested and obtained from EEOC the multiyear employment plan for the National Archives and Records Administration. We reviewed each of these plans for compliance with EEOC reporting requirements.

The work force data submitted within these plans in most cases were fiscal year 1987 data; however, in some instances where plans were submitted late, the data provided are more recent. We did not verify the accuracy of the data contained in agency plans. For most agencies, the source of the data was OPM's CPDF, which covers most federal employees. Agencies not covered by the CPDF submitted agency-generated work force data.

We used EEOC's standards and evaluation techniques to determine whether minorities and females were fully represented at agencies. The EEOC uses these standards and techniques to evaluate the EEO efforts of federal agencies. According to EEOC directives, a group is underrepresented if the percentage at which a group is represented in an agency's work force is less than the rate at which the group is represented in the national CLF. The CLF represents persons 16 years of age or over who are employed or seeking employment, excluding those in the armed forces. To gauge representation, the EEOC grouped (1) the federal government's 420 white-collar jobs into the five PATCO 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 it compares work force data that agencies align by PATCO category and major occupation. It also instructs agencies to use the PATCO-grouped CLF data as the base of comparison.

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