

**GAO**

Report to the Chairman, Committee on  
Post Office and Civil Service, House of  
Representatives

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January 1990

# EQUAL EMPLOYMENT OPPORTUNITY

## Representation of Minorities and White Women at Fort Lee Army Post, Virginia



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United States  
General Accounting Office  
Washington, D.C. 20548

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General Government Division

B-237634

January 17, 1990

The Honorable William D. Ford  
Chairman, Committee on Post Office  
and Civil Service  
House of Representatives

Dear Mr. Chairman:

As requested in your February 9, 1989, letter, we reviewed the equal employment opportunity (EEO) program for civilian personnel assigned to the U.S. Army Post at Fort Lee, Virginia. As agreed with the Committee, our objectives were to determine whether underrepresentation of minorities and white women exists at Fort Lee and, if so, ascertain what Fort Lee is doing to reduce underrepresentation and the progress it has made. We also agreed to determine if there are actions Fort Lee could take to strengthen the overall management of its EEO program.

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## Approach

We used Equal Employment Opportunity Commission (EEOC) standards and evaluation techniques to determine whether underrepresentation exists for various EEO groups at Fort Lee. Underrepresentation exists, according to EEOC standards, if the percentage rate at which an EEO group is represented in an agency's workforce is less than the rate the group is represented in the local civilian labor force (CLF) as identified in the most recent census.

The most recent applicable CLF data was for 1980. Using this data, we made direct comparisons between the Fort Lee and local labor forces on an overall basis and on seven occupational categories, such as professional, administrative, and clerical. The CLF data was not, however, broken out by salary level within those occupational categories. Thus to determine if underrepresentation existed in Fort Lee's higher paying jobs, we compared the representation of EEO groups in grades GM/GS-13 through GM/GS-15 professional and administrative occupations—essentially all the higher paying jobs at Fort Lee—with EEO group representation in those occupations as reflected in the local CLF without regard to salary level.

We recognize that the 1980 CLF data may not reflect the various EEO groups' current overall representation in the local labor force because of the age of the data and lack of salary information. However, the 1980 CLF census is the best information currently available and we believe

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that the results of our comparisons are useful in assessing Fort Lee's EEO program.

Details on our objectives, scope, and methodology are included in appendix I.

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## Results in Brief

From an overall perspective, in June 1989 blacks were underrepresented in the Fort Lee work force, but other minorities and white women were not. The representation of black men was 64 percent of their representation in the local CLF; black women, 92 percent. The percentage of underrepresentation is much larger and underrepresentation more widespread when certain salary levels and specific occupations at Fort Lee are compared to available CLF data.

Essentially, all pay grades 13 through 15 are in the professional and administrative occupational categories at Fort Lee, and black men, black women, and white women were underrepresented in both categories. As of June 1989, for example, the representation of black men, black women, and white women employed by Fort Lee as professionals at pay grades 13 through 15 was 12, 37, and 49 percent, respectively, of their representation in the CLF professional category.

Since 1987, Fort Lee has taken a number of actions to reduce underrepresentation. Among other actions, Fort Lee has developed and begun to implement an EEO affirmative employment plan for fiscal years 1988-1992. The major objective of the plan is to eliminate underrepresentation, particularly at grades 13 through 15. The representation of black men, black women, and white women in grades 13 through 15 professional and administrative occupations generally improved between December 1986 and June 1989. For example, as of December 1986, there were no black women at these grades in professional occupations at Fort Lee. As of June 1989, their representation was 4.3 percent, or 37 percent of their representation (11.5 percent) in professional occupations of the local CLF.

In addition, to strengthen management of its EEO program, Fort Lee has begun issuing written policies and procedures to govern the EEO program and clarifying the EEO performance standards that apply to managers and supervisors. We endorse the need to complete these actions and believe that Fort Lee should supplement them with an examination of

ways to reduce the time taken to resolve formal discrimination complaints. Most of the formal complaints in process as of June 1989 exceeded the Army's 180-day standard for resolving them.

## Background

In 1972, Congress amended the Civil Rights Act of 1964 to require certain federal agencies to submit an annual EEO plan to EEOC for approval in order to maintain an affirmative EEO program and to ensure implementation of EEO policies for all employees and applicants for federal employment. The EEOC is responsible for providing affirmative action guidance, monitoring the hiring and promotion of minorities and women, and overseeing the governmentwide discrimination complaint process.<sup>1</sup>

Through its EEO Management Directive 714, dated October 6, 1987, EEOC requires agencies, including installations with 2,000 or more employees, such as Fort Lee, to prepare multiyear plans and update them annually and to report accomplishments annually. As part of the multiyear plan development, each agency is to analyze its work force, compare the representation of EEO groups for various occupational and grade/pay categories in the agency's work force with the representation of the same groups in the appropriate CLF, and take steps to address barriers and problems that restrict equal employment opportunities.<sup>2</sup>

Fort Lee Army Post, near Petersburg, Virginia, is the headquarters of the U. S. Army Quartermaster Center and the U. S. Army Quartermaster School and is the home of about 20 other Army components. It is one of several installations under the U. S. Army Training and Doctrine Command (TRADOC), which is responsible for approving Fort Lee's EEO program plans and monitoring adherence of the installation's EEO program and related actions with Department of Defense, Department of the Army, and TRADOC regulations. In June 1989, Fort Lee had a permanent civilian population of about 3,500 employees. Appendix II, figures II 1

<sup>1</sup>42 U.S.C. 2000e-16(b) and 12(a) (1982).

<sup>2</sup>EEOC's Management Directive 714, dated October 6, 1987, defines EEO groups to include white men and women; black men and women; and Hispanic, Asian/Pacific Islander, and American Indian, Native Alaskan men and women. The directive defines occupational categories to include professional, administrative, technical, clerical, and blue collar. Further, the directive defines civilian work force to include persons 16 years of age or over, except those in the armed forces, who are employed or seeking employment. For Fort Lee, the local CLF includes the Standard Metropolitan Statistical Area of Petersburg, Colonial Heights, and Hopewell, Virginia. Fort Lee used CLF data developed from the 1980 census and provided by EEOC for determining underrepresentation. Because of the extensive time that would have been required, we did not attempt to verify the data Fort Lee used for determining underrepresentation.

and II.2, provides a breakout of the employees by EEO group and occupational category.

Fort Lee's Commanding General is responsible for preparing EEO multi-year program plans and annually submitting related accomplishment reports and plan updates. The Commanding General has designated an EEO Officer, who reports to the Commanding General's Chief of Staff, to administer the EEO program. EEO Counselors in the various Fort Lee components are primarily responsible for attempting to informally resolve inquiries and complaints concerning possible racial and sexual discrimination.

## Underrepresentation in Fort Lee's Work Force

As required by EEOC's management directive, Fort Lee compiled data comparing the representation of EEO groups in its work force with their representation in the CLF for the Fort Lee metropolitan area. The data show that there was underrepresentation of EEO groups, particularly black men, in the overall Fort Lee work force and, to a greater extent, in senior and middle management positions and various occupational categories. Summarized below is information on the extent of underrepresentation, and appendix III provides tables and figures on the underrepresentation in Fort Lee's work force overall and in various grade/pay and occupational categories.

### Blacks Underrepresented in Overall Work Force

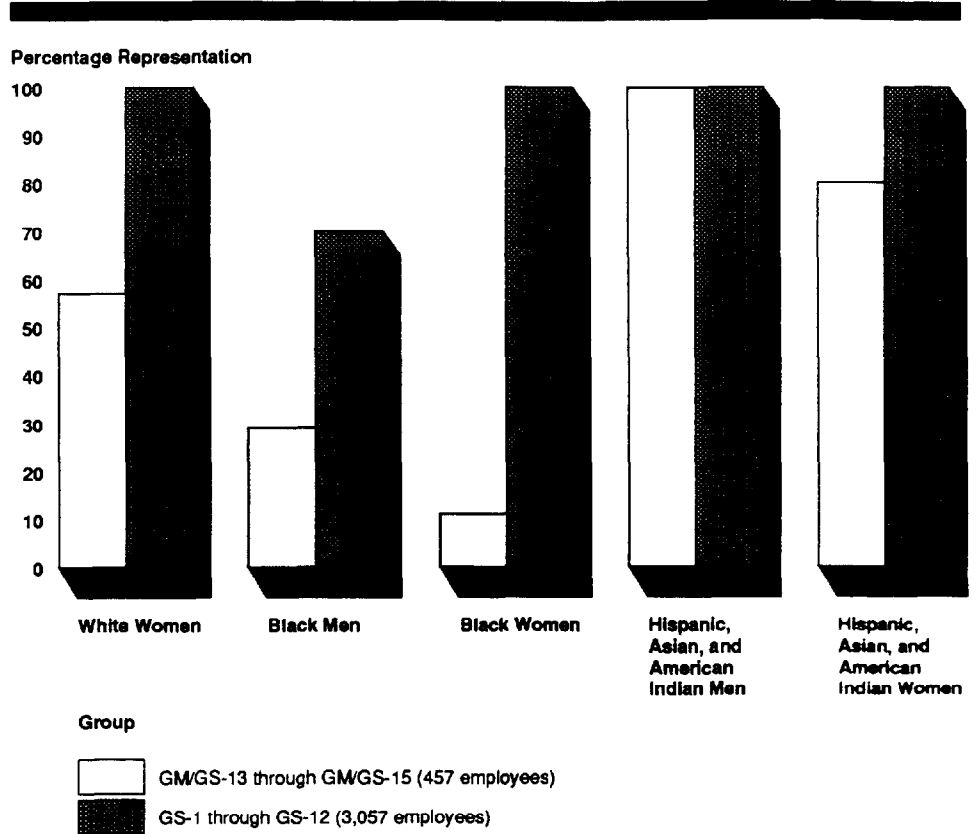
In June 1989, the combined representation of black men and women at Fort Lee was 79 percent of their representation in the local CLF. Black men had a lower representation (64 percent) than black women (92 percent). In contrast to representation of blacks, the overall representation of all other minority groups and white women in the Fort Lee labor force exceeded the representation in the local CLF. (See table III.1.)

### Underrepresentation in Higher Grades and Various Occupational Categories

On the basis of available CLF data and Fort Lee work force data as of June 1989, underrepresentation was greater at grades GM/GS-13 through GM/GS-15 than at grades GS-1 through GS-12. (See fig. 1.)

Figure 1 shows that at grades GM/GS-13 through GM/GS-15 there was greater underrepresentation of blacks than for other EEO groups. The results are similar when only professional positions are considered. In June 1989, the representation of black men at these grades in the professional occupational category, for example, was 12 percent of their

**Figure 1: Representation of Fort Lee Work Force in Grades GS-1 Through GS-12 and GM/GS-13 Through GM/GS-15 as of June 1989**



Note 1: Percentage representation indicates the extent that a particular EEO group is represented in Fort Lee's work force as compared to the group's representation in the local CLF.

Note 2: CLF data do not break out EEO groups by pay levels. The representation of a group at a given pay level may differ from the group's representation in the overall CLF.

Note 3: We combined the Hispanic, Asian/Pacific Islander, and American Indian/Native Alaskan EEO groups for our reporting purposes because each group represented less than 1 percent of the total CLF.

representation in that category of the local CLF; the representation of black women in this category was 37 percent. (See table III.2.)

Figure I also shows that for grades GS-1 through GS-12 black men comprised the only EEO group underrepresented as of June 1989. The underrepresentation of black men for these grades was essentially in Fort Lee's clerical occupational category. In June 1989, Fort Lee had a total of 843 employees in the clerical category, all at grades 1 through 8. Of these 843, 33, or 3.9 percent, were black men, which was 39 percent of

their representation (10 percent) in the CLF clerical category. (See fig. III.1.)

For all grade levels and all occupational categories, there was underrepresentation of white women and each minority group in one or more of the five occupational categories as measured in June 1989. The representation of black men at Fort Lee was below their representation in the local CLF in four categories, and the representation ranged from 39 percent for the clerical category to 96 percent for the administrative category. Other minority groups and white women were below the local CLF in 1 or 2 of the 5 categories. (See figs. III.2 and III.3.)

In determining whether various EEO groups are underrepresented, EEOC requires agencies, including Fort Lee, to use CLF data developed in the 1980 census. Nationally, considerable change has occurred in the CLF since 1980. Bureau of Labor Statistics data show that blacks, Hispanics, and white women have increased their representation in the national CLF in recent years. To the extent that minority and white women representation has increased in the local CLF, the underrepresentation in Fort Lee's labor force would be greater than indicated above and in appendix III.

### Improvements in Minority and White Women Representation

As shown in table III.1, black men and black women at Fort Lee comprised the only minority groups underrepresented overall as of June 1989. Fort Lee work force data show that the representation of both black men and black women improved between December 1986 and June 1989.

The overall representation of black women in the Fort Lee work force increased from 12.2 percent in December 1986 to 15.1 percent in June 1989. This change amounts to a 24-percent increase in representation. Representation of black men increased from 9.7 to 10.5 percent between the same two dates. This change amounts to an 8-percent increase.

The representation of blacks and white women at GM/GS-13 through GM/GS-15 in the professional and administrative categories generally increased between December 1986 to June 1989. Specifically, the representation of white women and black women increased in both categories. For example, as of December 1986, there were no black women at these grades in professional occupations at Fort Lee as of December 1986. As of June 1989, their representation was 4.3 percent, or 37 percent of their representation (11.5 percent) in professional occupations of



the local CLF. The representation of black men increased from 3.6 percent to 6.3 percent in the administrative category and remained the same (.9 percent) in the professional category. (See figs. III.4 through III.9.)

## Fort Lee Has Taken Actions to Improve EEO Program Management

Earlier reviews by other organizations showed that the EEO program at Fort Lee was deficient in many areas. In August 1987, as a result of a report by House Armed Services Committee staff, the Committee Chairman recommended that the Secretary of the Army make a comprehensive investigation of Fort Lee's civilian personnel practices. The Secretary responded in December 1987 that the Army's reviews at Fort Lee over a 3-year period had revealed many deficiencies in the EEO program and that leadership in establishing a viable program had been lacking for some time. The Secretary also said that Major General William McLean, who assumed command at Fort Lee in late summer 1987, had established an approach to EEO that involved top management and had established the structure and placed accountability for getting results.

We found that since 1987, Fort Lee had taken a number of steps to improve the management of the EEO program and to increase promotion opportunities for minorities and white women.

## Improving EEO Program Planning

One step taken by Fort Lee was the development and the implementation beginning in fiscal year 1988 of a Fort Lee Affirmative Employment Program Plan for Fiscal Years 1988-1992. According to Fort Lee officials, the installation did not have an approved EEO program plan until 1984. Fort Lee began developing its current plan in October 1987 with the involvement of the Commanding General and all major Fort Lee components. It completed the plan in February 1988 and, after TRADOC's approval in May 1988, EEOC approved the plan in January 1989.

Fort Lee's approved EEO plan identified eight problems and barriers affecting equal employment opportunities at the installation. For example, the plan cited the lack of sufficient funds to continue training managers and employees in EEO related subjects; the reluctance of managers and supervisors to designate positions for the upward mobility program; and the existence of severe underrepresentation of minorities and women in nontraditional occupations, such as military analyst and logistics management specialist. The plan outlined objectives and proposed

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actions, including target dates, for addressing each of the problems and barriers identified.

In January 1989, Fort Lee reported on the accomplishment of various EEO objectives established in the approved plan. As one objective, for example, Fort Lee planned to add a total of 135 minorities and white women to specific targeted job series during fiscal years 1988 through 1992. During fiscal year 1988, it added a total of 40 minorities and white women, about 30 percent of the 5-year goal. Although Fort Lee more than exceeded 20 percent of the 5-year goal the first year, the additions were not always in the targeted job series. For example, in the education job series (1710), Fort Lee's goal was to add a total of 15 minorities and white women, but it did not add any minorities or white women to this job series in fiscal year 1988. In contrast, the goal in the logistics management series (346) was 15 minorities and white women, and Fort Lee added a total of 12 to this job series in fiscal year 1988, 80 percent of the 5-year goal.

In its accomplishment report to EEOC, Fort Lee also identified circumstances preventing certain objectives from being accomplished and set new objectives in an EEO plan update submitted to EEOC in January 1989. The plan update emphasized actions required to address a continuing "manifest imbalance and conspicuous absence" of minorities and women at the senior level (GS-13 through senior executive service) at Fort Lee.<sup>3</sup> For example, as part of the plan update, Lieutenant General William Tuttle, who assumed command at Fort Lee in January 1989, established a numerical goal to address underrepresentation at higher grades. The goal was to add to positions at the GM/GS-13 through GM/GS-15 as follows: 20 black men and women, 18 other minority men and women, and 20 white women in both fiscal year 1989 and 1990. Through the first 9 months of fiscal year 1989 (October 1988 through June 1989), Fort Lee had added, in total, 13 minorities (including 11 black men and women) and 7 white women to its work force at these grades, or about 35 percent of its first-year goal.

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<sup>3</sup>Manifest imbalance and conspicuous absence are terms prescribed and defined in EEOC Directive 714 to characterize the extent of representation of EEO groups. Conspicuous absence refers to a particular EEO group that is nearly or totally nonexistent from a particular occupation or grade level in the work force. Manifest imbalance refers to representation of an EEO group in a specific occupation grouping or grade level that is substantially below its representation in the appropriate OLF. Neither EEOC, the Department of the Army, TRADOC, nor Fort Lee have determined the percentage of underrepresentation constituting a manifest imbalance or conspicuous absence of an EEO group.

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## Developing an Applicant Pool

According to Fort Lee officials, the availability of qualified minorities and white women who can be considered for promotion to higher grade levels limits Fort Lee's success in achieving its EEO goals. To deal with this, Fort Lee established and was emphasizing a number of programs, such as the upward mobility program, to prepare employees for advancement to higher level positions. During the period January 1986 through June 1989, employees selected for the upward mobility program had been predominately from the ranks of underrepresented groups. For example, of the 34 candidates during this period, 15 were white women, 14 were black women, and 2 were Hispanic women. However, according to Fort Lee officials, managers and supervisors had been reluctant to designate positions for the upward mobility program. Therefore, as part of Fort Lee's plan update, the Commanding General set a specific, numerical goal of establishing upward mobility positions equal to 5 percent of Fort Lee's total employees, an action that EEOC commended when approving Fort Lee's plan.

Fort Lee officials said most of the special programs were targeted to positions having career ladders to GS-9 and GS-11 and did not directly increase the applicant pool for GS-13 positions. However, the programs offer the potential to increase the applicant pool for GS-11 and GS-12 positions and, ultimately, can help increase the number of minorities and white women who can be considered for GM/GS-13 positions. In this regard, our analysis of promotion data provided by Fort Lee indicated that black men, black women, and white women received 30 (14 percent), 17 (8 percent), and 72 (33 percent) respectively, of the 219 promotions to GS-12 positions at Fort Lee between January 1986 and June 1989.

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## Emphasizing Promotion Opportunities

Fort Lee officials said that to address underrepresentation at grades GM/GS-13 through GM/GS-15, Fort Lee had emphasized the use of promotion opportunities rather than options such as upper level hiring. According to Fort Lee's EEO plan, the use of hiring itself is a barrier to reducing underrepresentation of EEO groups at higher grades in certain occupations, such as military analyst and logistics management specialist, because the qualification requirements at the full-performance level and veterans preference can have the effect of excluding women and minorities.

Fort Lee had made progress in increasing the representation of minorities and white women at GM/GS-13 through GM/GS-15. Promotion data gathered by the Fort Lee EEO Office show that minorities and white

women received a higher percentage of Fort Lee's total promotions to these grades in 1989 than in 1986. For example, of the total number of Fort Lee employees promoted to GM/GS-13 through GM/GS-15, 17 percent were black men and 6 percent were black women during the first 9 months of fiscal year 1989 (October 1988-June 1989). In comparison, there were no black men or black women promoted to these levels during the last 9 months of fiscal year 1986 (January 1986 through October 1986.)

Between December 1986 and June 1989, the actual number of black men and women in Fort Lee's work force at GM/GS-13 through GM/GS-15 increased by 17, from 13 to 30. The number of white women at the same grade levels increased by 23, 47 to 70, during the same period. In comparison, the number of white men at these grade levels increased by 17, from 313 to 330.

### Other EEO Actions Taken

Fort Lee officials said they had taken other actions to improve the management of the EEO program and to reduce underrepresentation of minorities and white women. They had

- provided EEO training to the approximately 800 managers and supervisors at the installation;
- increased the number of EEO counselors from 3 in December 1986 to 27 in October 1989;
- required the EEO officer of each major Fort Lee organization to make semiannual reviews of EEO program implementation; and
- streamlined the discrimination complaint process, which included the consolidation of all decisionmaking on complaints under the Commanding General.

### Additional Actions Can Improve EEO Program Management

We identified additional actions that Fort Lee could take to improve accountability for the implementation of the EEO program and accomplishment of EEO objectives. Fort Lee officials initiated, but had not completed as of October 1989, the additional actions that we identified.

### Written EEO Policies and Procedures

Management directives, such as Office of Management and Budget Circular No. A-123, dated August 1986, emphasize the need for written materials to describe operating procedures and communicate responsibilities so that when management changes, the organization's policies

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and procedures remain in effect. Fort Lee officials said they did not have written EEO policies and procedures for assuring equal employment opportunities for all employees. For example, Fort Lee had not accumulated overall promotion data by grade, race, and occupational category for use in evaluating the progress made in reducing underrepresentation at higher grade levels. The EEO Office gathered promotion data at our request so that we could assess the progress and has since begun to routinely gather and analyze promotion data.

In June 1989, Fort Lee had also begun to establish EEO policies and procedures for

- delineating in writing the EEO responsibilities of the Chief of Staff, EEO officer, EEO Counselors, and other officials responsible for implementing the EEO program;
- monitoring promotions, awards, and training to determine whether EEO objectives were being met and to identify what actions are necessary to accomplish the objectives; and
- guiding and assisting managers and supervisors in the use of underrepresentation data for promotions decisions.

To provide guidance in the above areas, the EEO Officer had completed a draft supplement to the EEO regulations (AR 690-12) issued by the Department of the Army. The EEO Officer said the supplement would be sent to TRADOC for review in November 1989. However, firm milestones had not been established by Fort Lee and TRADOC for issuing the supplement.

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## EEO Performance Standards

Office of Personnel Management (OPM) regulations require that the effectiveness of federal officials in executing their EEO responsibilities be evaluated as part of their periodic performance appraisals.<sup>4</sup> The Army's General Performance Appraisal System requires that each supervisor have a major performance standard for EEO and affirmative action, which is to be identified as a critical element.<sup>5</sup>

We reviewed the EEO performance standards, which are contained in civilian performance plans, of 14 randomly selected supervisors and

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<sup>4</sup>5 C.F.R. 720.204(a) (1989).

<sup>5</sup>Under OPM and Army regulations, standards designated as critical must be met in order for an employee's overall performance to be rated as acceptable. The failure to meet a critical standard can result in downgrading and removal of an employee.

managers at Fort Lee. Although each plan cited EEO responsibilities as a critical element, the responsibilities were generally described in vague and ambiguous terms. For example, one standard was that the supervisor "provides EEO and affirmative action principles to employee management." Another standard said "Accomplishes all supervisory functions such as assignment of projects, hiring, promotion, training, discipline, awards, etc., in a manner free of disparities regarding minorities or women."

The EEO Officer reviewed the EEO performance standards in the same 14 plans and did not believe that the standards in any of the 14 plans were complete. She had developed a more definitive statement of EEO responsibilities for managers and supervisors in October 1989. However, she was not certain when the standards would be included in civilian performance plans.

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## Discrimination Complaint Processing

Fort Lee had taken steps to improve the handling of EEO discrimination complaints. However, most of the formal complaints in process as of June 1989 exceeded the Army's overall 180-day time standard for resolving the complaints.

Fort Lee attempts to resolve employees' inquiries involving possible racial and sexual discrimination through its EEO Counselors and an informal precomplaint process. If the matter is not resolved through this process, Fort Lee employees may then file a formal complaint with the U. S. Army Complaint and Compliance Agency. Employees may then, under certain conditions, appeal the agency decision to EEOC or file a civil action in an appropriate U.S. district court.<sup>6</sup>

In August 1988, a Department of Army review team reported that Fort Lee had corrected some longstanding problems in handling EEO complaints. Although the report was positive overall, the team did note that there was still room for improving the docketing, timely processing, and closure of formal complaints. According to the report, for the complaints reviewed by the team, both the average time required to process formal complaints after they were filed, and the average time to request an investigation of the complaints after they were accepted, exceeded the Army's time standards.

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<sup>6</sup>29 C.F.R. 1613.231, 1613.233, 1613.281(1989).

In June 1989, over one-half of the formal complaints in process at Fort Lee were not meeting the Army's overall timeliness goal of 180 days from the date a complaint is accepted to its final resolution. Fort Lee's October 1988 - June 1989 reports to TRADOC on discrimination complaints showed that of the 26 complaints in process, 17 were more than 180 days old, as table 3 below shows. One complaint filed in May 1985 was more than 4 years old, and another complaint filed in November 1987 was nearly 2 years old.

**Table 1: Status of Formal Discrimination Complaints Filed at Fort Lee as of June 30, 1989**

Age category	Total	Number exceeding 180
30 days or less	1	0
31 to 90 days	4	0
91 to 180 days	4	0
181 to 365 days	8	8
366 days to 2 years	8	8
Over 2 years	1	1
<b>Total</b>	<b>26</b>	<b>17</b>

An in-depth analysis of the complaint process was beyond the scope of our review. However, given the above statistics, we believe that Fort Lee needs to address the timeliness with which formal complaints are being processed and determine what action is necessary to meet the Army's standard. The length of time required to resolve the complaints may be due, in part, to factors outside of Fort Lee's control. If action is required by higher Army levels, Fort Lee might use its EEO plan and annual updates to identify the cause of the problem and focus attention on finding solutions to meet the Army's standard.

## Conclusions

Although Fort Lee has improved the structure and management of its EEO program since 1987, the composition of its overall work force is not fully representative of the civilian labor force in the Fort Lee metropolitan area. Moreover, the percentage of underrepresentation of minorities and white women is much larger when higher grade levels and professional and administrative occupations at Fort Lee are compared with available CLF data.

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As of October 1989, Fort Lee had yet to complete the development of written EEO policies and procedures and the clarification of EEO performance standards, which could help establish accountability for implementing the program and accomplishing related objectives. Also, the resolution of formal EEO complaints according to the overall Army time standard could enhance the credibility and effectiveness of the EEO program.

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### Recommendation to the Commanding General, Fort Lee

We recommend that the Commanding General, Fort Lee, ensure that Fort Lee sets and meets milestones for (1) establishing written EEO policies and procedures and (2) clarifying EEO performance standards. We also recommend that the Commanding General determine why the resolution of formal discrimination complaints has generally exceeded the Army's standard and take appropriate corrective actions.

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### Agency Comments

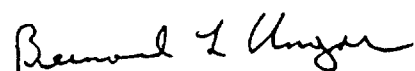
As requested, we did not obtain formal agency comments on this report. We did informally discuss the results of our review with the Commanding General and the EEO Officer at Fort Lee, the Commanding General's Chief of Staff and EEO officials at TRADOC, and EEO representatives of the Office of the Secretary of Defense and the Office of the Secretary of the Army. All agreed with our findings, conclusions, and recommendations. They suggested several technical changes to the draft report, which we incorporated into the final report. Both the Commanding General at Fort Lee and the Chief of Staff at TRADOC said that Fort Lee was similar to other TRADOC installations in minority representation. In addition, the EEO representatives for the Offices of the Secretary of Defense and the Secretary of the Army said they plan to require Fort Lee to (1) develop a plan of action, including milestones for completing the actions, to address our recommendations; and (2) take any additional actions that may be necessary to deal with our findings.



As agreed with the Committee, we are sending copies of this report to the Secretary of the Army and other interested parties. We will provide copies to other parties upon request.

The major contributors to this report are listed in appendix II. Please call me at 275-5074 if you or members of your staff have any questions.

Sincerely yours,



Bernard L. Ungar  
Director, Federal Human Resource  
Management Issues

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**Abbreviations**

CLF	Civilian labor force
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
OPM	Office of Personnel Management
TRADOC	U.S. Training and Doctrine Command

# Objectives, Scope, and Methodology

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As agreed with the Committee, the objectives of our review were to determine whether underrepresentation of minorities and white women exists at the U.S. Army base at Fort Lee, Virginia and, if so, ascertain actions Fort Lee had taken and progress it had made in reducing underrepresentation. We also agreed to identify any additional actions that Fort Lee could take to strengthen the overall management of the EEO program.

We developed background information for accomplishing the objectives by reviewing relevant EEO statutes and regulations, directives and guidance issued by the Department of the Army, TRADOC Headquarters, OPM, EEOC and Fort Lee.

We used EEOC standards and evaluation techniques to determine whether underrepresentation exists for various EEO groups at Fort Lee. Underrepresentation exists, according to EEOC standards, if the percentage rate at which an EEO group is represented in an agency's workforce is less than the rate the group is represented in the local CLF as identified in the most recent census.

The most recent applicable CLF data was for 1980. Using this data, we made direct comparisons between the Fort Lee and local labor forces on an overall basis and on seven occupational categories such as professional, administrative, and clerical. The CLF data was not, however, broken out by salary level within those occupational categories. Thus to determine if underrepresentation existed in Fort Lee's higher paying jobs, we compared the representation of EEO groups in grades GM GS-13 through GM/GS-15 professional and administrative occupations—especially all the higher paying jobs at Fort Lee—with EEO group representation in those occupations as reflected in the local CLF without regard to salary level.

We recognize that the 1980 CLF data may not reflect the various EEO groups' current overall representation in the local labor force because of the age of the data and lack of salary information. However, the 1980 CLF census is the best information currently available and we believe that the results of our comparisons are useful in assessing Fort Lee's EEO program.

We did not, however, verify the accuracy of the data used in determining underrepresentation because an inordinate amount of time would have been required.

We also analyzed promotion data provided by Fort Lee's EEO Office for January 1986 through June 1989 to determine the progress made at Fort Lee in reducing underrepresentation, particularly among minorities and white women in higher graded positions (GM/GS-13 through GM/GS-15). We concentrated on positions at these grade levels because Fort Lee's work force data indicated that blacks and white women were most severely underrepresented at these higher levels. We verified the promotion data, on a test basis, by comparing schedules prepared by Fort Lee EEO officials with the approved notifications of personnel actions.

To identify EEO actions Fort Lee had taken and could take in the future, we reviewed the Fort Lee Affirmative Employment Program Plan for Fiscal Years 1988-1992 and other documentation, such as the plan update and accomplishment report for fiscal year 1988. These documents contained the results of Fort Lee's EEO program analysis, identified barriers affecting equal employment opportunity, and described Fort Lee's objectives and planned actions for addressing the barriers. We analyzed Fort Lee's work force data to identify changes in minority and white women representation for January 1986 through June 1989. We discussed with the Commanding General and EEO officials at Fort Lee actions Fort Lee could take to improve the EEO program.

We discussed the results of our review with officials at Fort Lee, TRADOC, the Department of Army, and the Department of Defense. We made technical changes in the report, where appropriate, as a result of their comments.

Our review, made from March through October 1989 primarily at Fort Lee, was in accordance with generally accepted government auditing standards.

# Overview of Fort Lee's Work Force

**Figure II.1: Distribution of Fort Lee Employees by EEO Group as of June 1989**

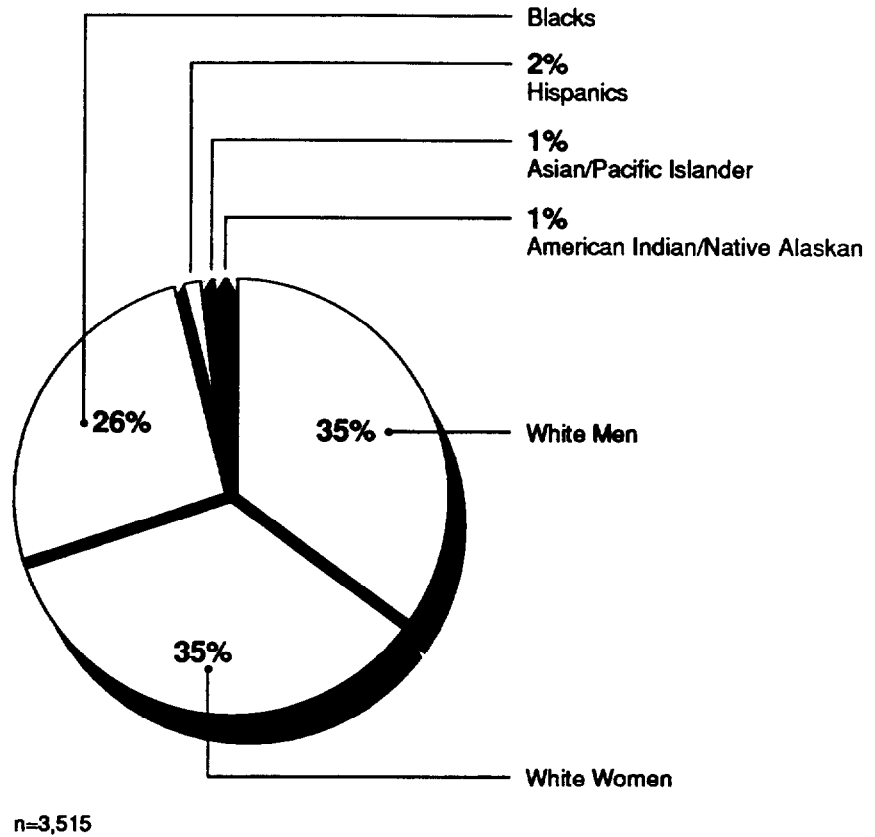
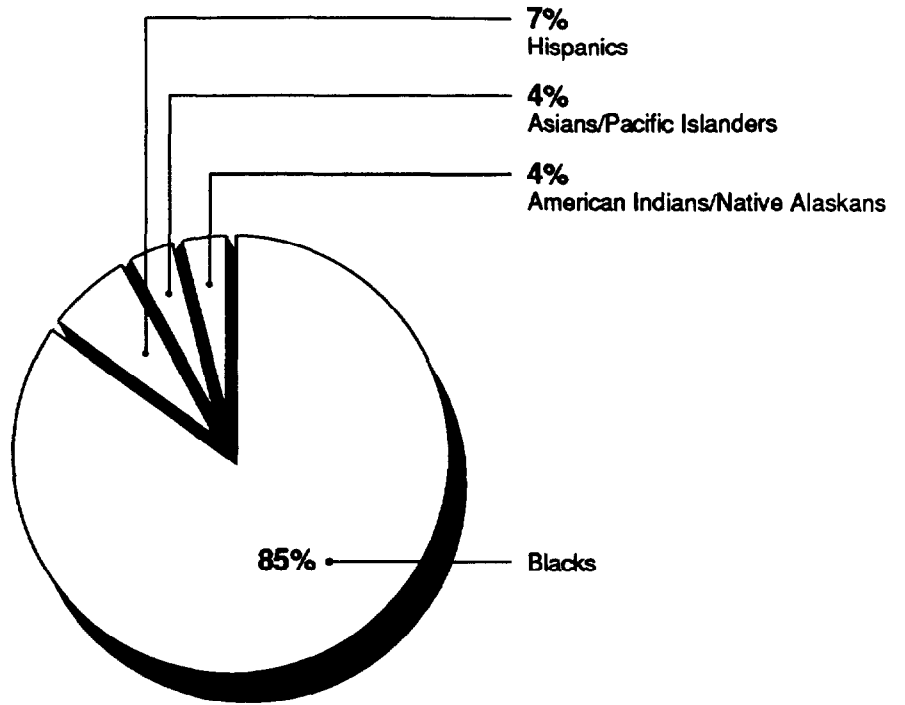
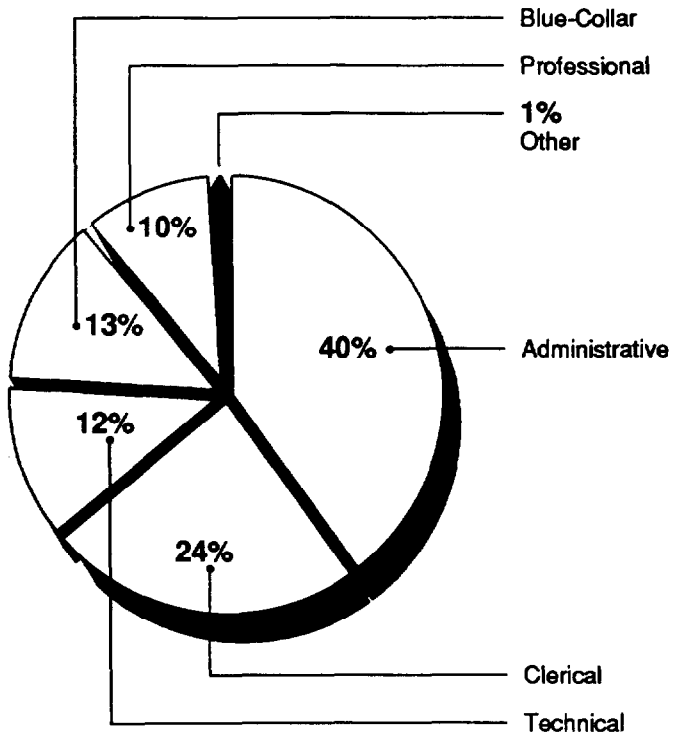


Figure II.2: Distribution of Minorities at  
Fort Lee as of June 1989



n=1,052

Figure II.3: Distribution of Fort Lee Employees by Major Occupation Category as of June 1989



n=3,515



# Representation of EEO Groups in Fort Lee Labor Force

**Table III.1: Overall Fort Lee Work Force as of June 1989 Compared to the 1980 Local Civilian Labor Force**

	White			Black			Hispanics, Asians, and American Indians <sup>a</sup>		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
<b>Fort Lee work force</b>									
Number	1,240	1,223	2,463	369	530	899	81	72	153
Percentages	35.3	34.8	70.1	10.5	15.1	25.6	2.3	2.0	4.3
<b>Local CLF</b>									
Percentages	38.6	26.9	65.5	16.3	16.4	32.6	0.8	1.1	1.9
<b>Fort Lee Work Force as percentage of local CLF<sup>b</sup></b>	92	100+	100+	64	92	79	100+	100+	100+

<sup>a</sup>We combined these groups for our reporting purposes because the representation of each group in the 1980 local CLF was less than 1 percent and because none of the groups were underrepresented in the overall Fort Lee work force as of June 1989. Fort Lee's EEO program analyses, including underrepresentation determinations, are made for each EEO group individually.

<sup>b</sup>This type of percentage index, called an underrepresentation index by EEOC and OPM, indicates the extent that a particular EEO group is represented in an agency's work force as compared to the group's representation in the CLF. The index is calculated by dividing an agency's employment percentage for a group in a given employment category by the appropriate CLF percentage of that same group and multiplying the result by 100. The index can range from 0 to 100+, with lower numbers indicating more severe underrepresentation.

**Table III.2: Fort Lee GM/GS-13 Through GM/GS-15 Professional Work Force as of June 1989 Compared to the 1980 Local Professional Civilian Labor Force<sup>a</sup>**

	White women	Black			Hispanics, Asians, and American Indians <sup>a</sup>	
		Men	Women	Total	Men	Women
<b>Fort Lee work force</b>						
Number	16	1	5	6	6	1
Percentages	13.8	0.9	4.3	5.2	5.2	0.9
<b>Local CLF</b>						
Percentages <sup>c</sup>	28.4	7.3	11.5	18.8	1.8	1.4
<b>Fort Lee work force as percentage of local CLF<sup>d</sup></b>	49	12	37	28	100+	64

<sup>a</sup>According to Fort Lee work force data, all but two employees at GM/GS-13 through GM/GS-15 were in professional and administrative categories. The other two employees (white men) were in the senior executive positions. Fort Lee had one employee at the senior executive level, a white man in an administrative position.

<sup>b</sup>See footnote a, Table III.1.

<sup>c</sup>CLF data do not break out EEO groups by pay levels. The representation of a group at a particular pay level in the CLF may differ from the group's overall representation in the occupational category that is reported here.

<sup>d</sup>See footnote b, Table III.1.

**Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force**

**Table III.3: Fort Lee GM/GS-13 Through GM/GS-15 Administrative Work Force as of June 1989 Compared to the 1980 Local Civilian Administrative Labor Force<sup>a</sup>**

	White women	Black		Total	Hispanics, Asians, and American Indians <sup>b</sup>	
		Men	Women		Men	Women
<b>Fort Lee work force</b>						
Number	54	21	3	24	13	3
Percentages	16.1	6.3	0.9	7.2	3.9	0.9
<b>Local CLF</b>						
Percentages <sup>c</sup>	21.9	9.0	7.1	16.1	0.9	0.6
<b>Fort Lee work force as percentage of local CLF<sup>d</sup></b>	74	70	13	45	100+	100+

<sup>a</sup>See footnote c, Table III.2

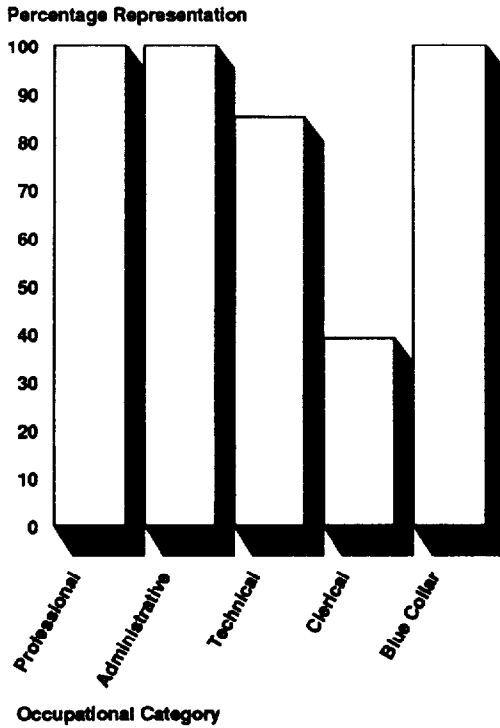
<sup>b</sup>See footnote a, Table III.2

<sup>c</sup>See footnote e, Table III.2

<sup>d</sup>See footnote b, Table III.1

**Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force**

**Figure III.1: Representation of Black Men in Grades GM/GS-13 Through GM/GS-15 by Occupational Category as of June 1989**



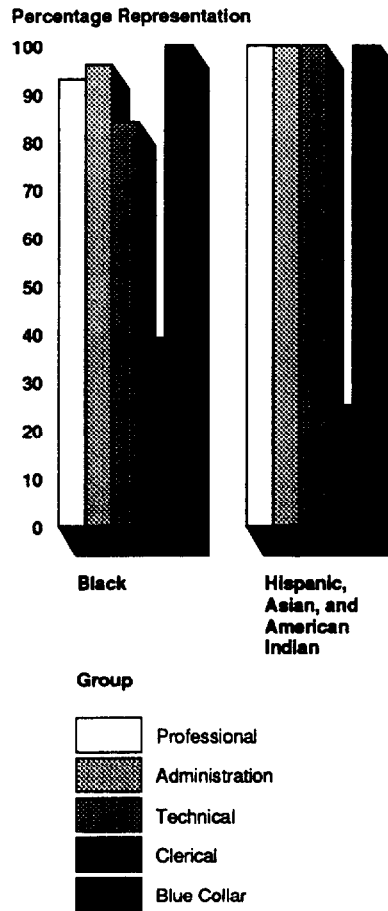
Note 1: Percentage representation is the rate that the applicable EEO group is represented in the Fort Lee work force occupational category as compared to that group's representation in the local CLF occupational category without regard to pay level.

Note 2: CLF data do not break out EEO groups by pay levels within occupational categories

Note 3: The representation of black men was 85 percent in the technical category, which accounted for 13 percent of Fort Lee's total employees, and was 39 percent in the clerical category, which accounted for 24 percent of the total.

**Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force**

**Figure III.2: Representation of Minority Men by Major Occupational Category as of June 1989**



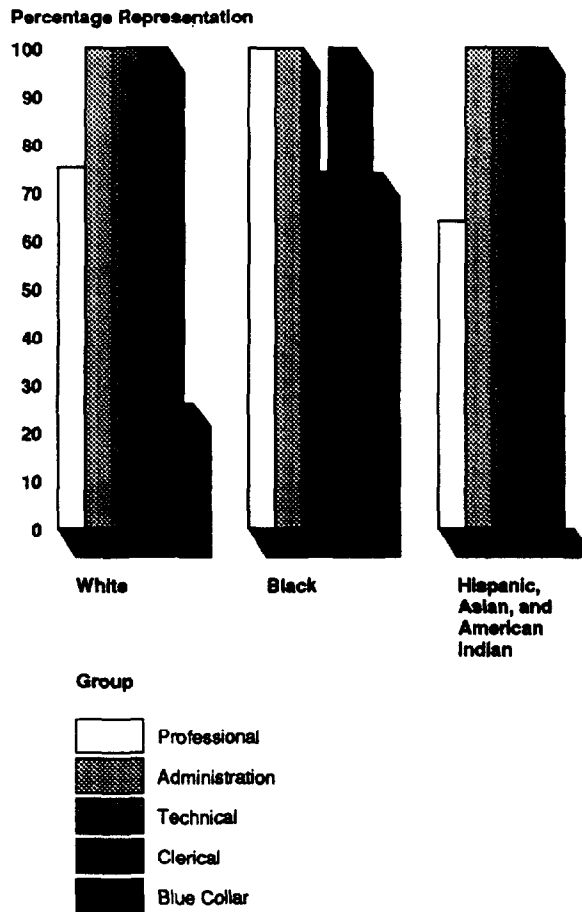
Note 1: Percentage representation is the rate that the applicable EEO group is represented in the Fort Lee work force occupational category as compared with that group's representation in the local CLF occupational category.

Note 2: We combined the Hispanic, Asian/Pacific Islander, and American Indian/Native Alaskan EEO groups for our reporting purposes because each group represented less than 1 percent of the 1980 local CLF.

Note 3: We excluded Fort Lee's employees in the "other" occupational category because it accounted for less than 1 percent (37 employees) of its total work force as of June 1989.

**Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force**

**Figure III.3: Representation of Women by  
Major Occupational Category as of June  
1989**



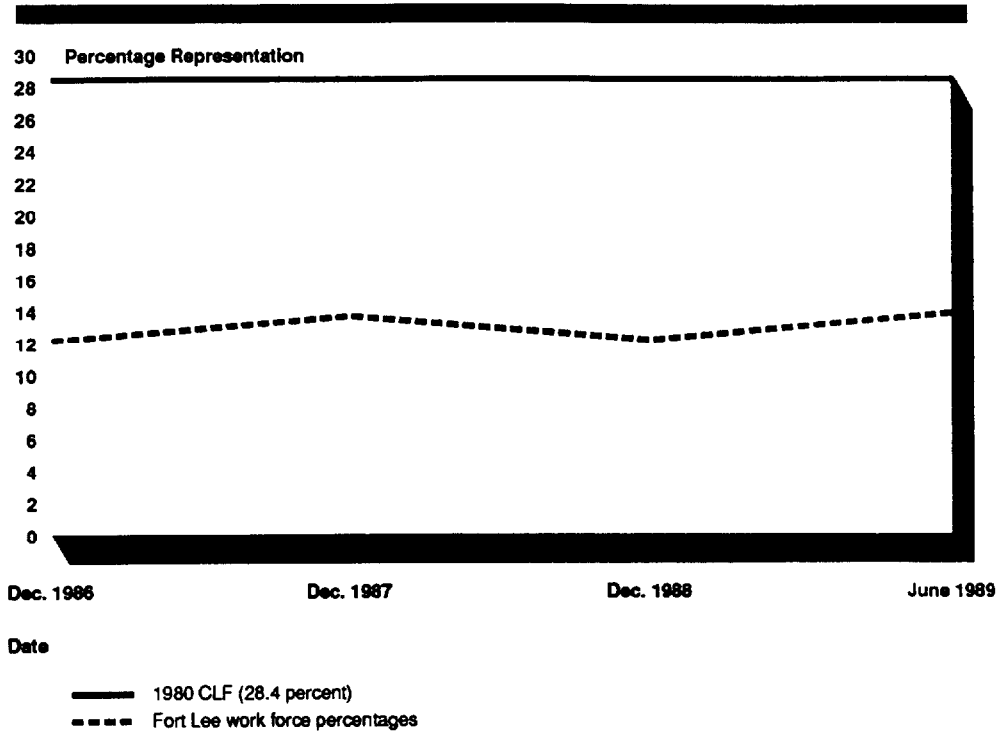
Note 1: Percentage representation is the rate that the applicable EEO group is in the Fort Lee work force occupational category as compared to that group's representation in the local CLF occupational category.

Note 2: We combined the Hispanic, Asian/Pacific Islander, and American Indian/Native Alaskan EEO groups for our reporting purposes because each group represented less than 1 percent of the 1980 local CLF.

Note 3: We excluded Fort Lee's employees in the "other" occupational category because it accounted for less than 1 percent (37 employees) of its total work force as of June 1989.

Appendix III  
 Representation of EEO Groups in Fort Lee  
 Labor Force

Figure III.4: White Women  
 Representation in GM/GS-13 Through  
 GM/GS-15 Professional Occupations

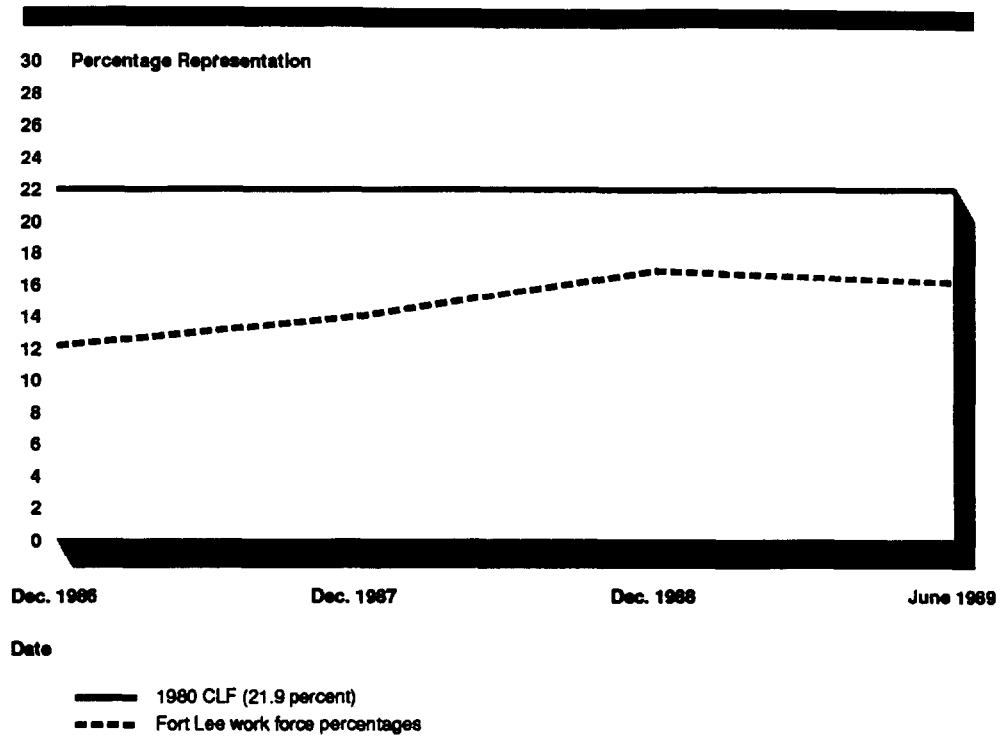


Note 1: Percentage representation is the rate that the applicable EEO group is represented in the Fort Lee work force occupational category as compared to that group's representation in the local CLF occupational category without regard to pay level.

Note 2: CLF data do not break out EEO groups by pay levels within occupational categories.

Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force

Figure III.5: White Women  
Representation in GM/GS-13 Through  
GM/GS-15 Administrative Occupations

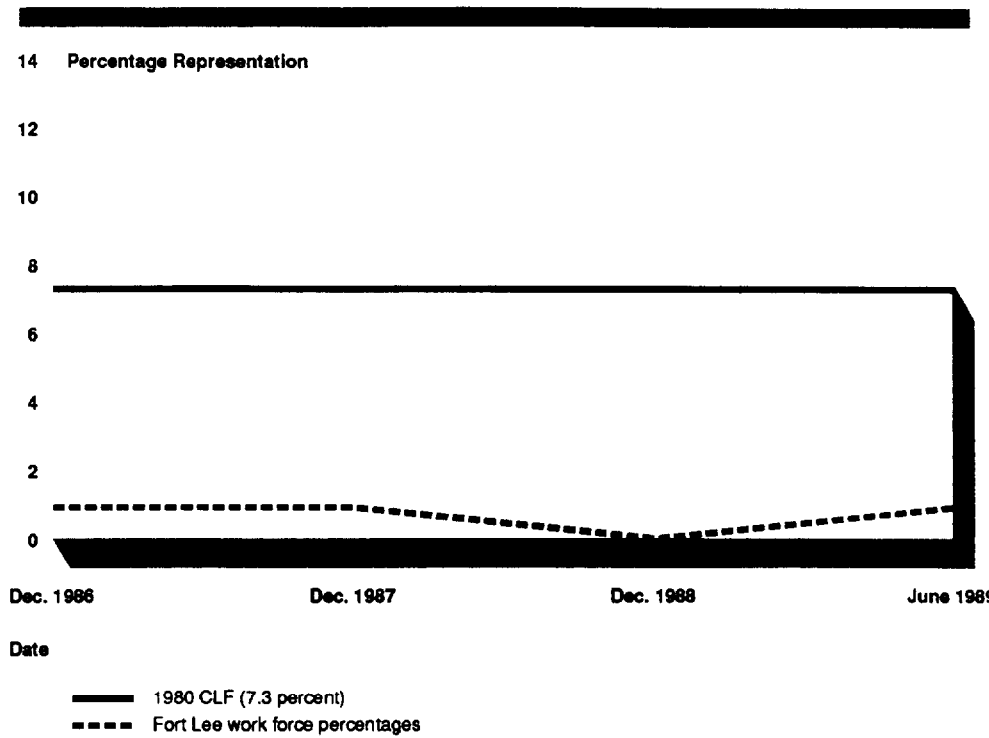


Note 1: Percentage representation is the rate that the applicable EEO group is represented in the Fort Lee work force occupational category as compared to that group's representation in the local CLF occupational category without regard to pay level.

Note 2: CLF data do not break out EEO groups by pay levels within occupational categories.

Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force

Figure III.6: Black Men Representation in  
GM/GS-13 Through GM/GS-15  
Professional Occupations



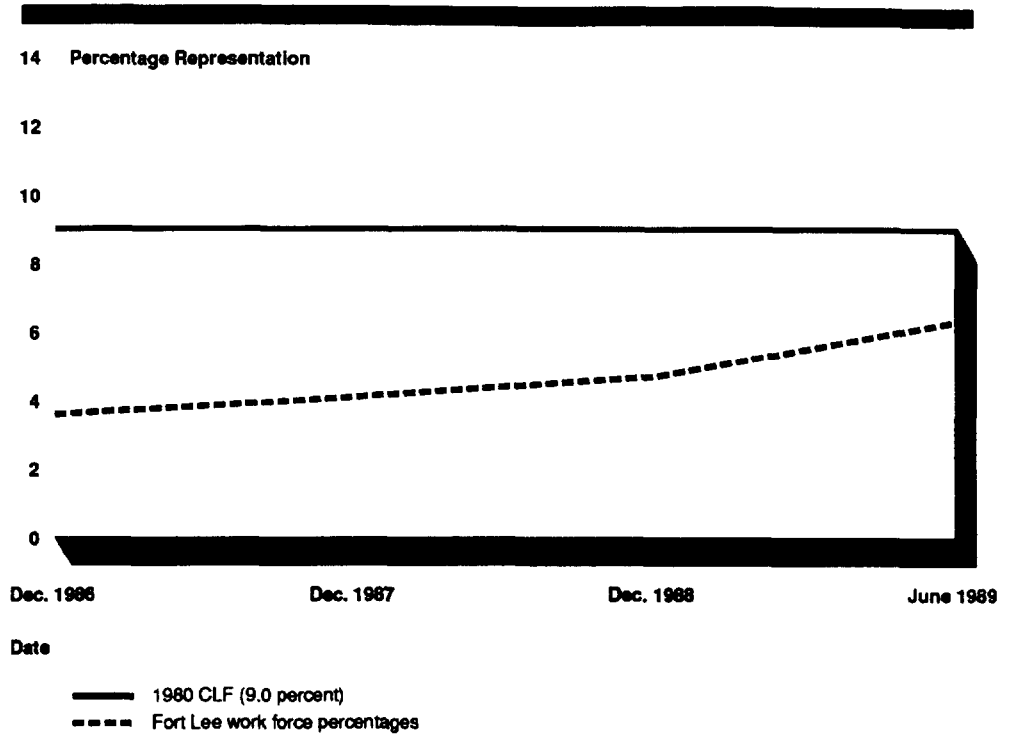
Note 1: Percentage representation is the rate that the applicable EEO group is represented in the Fort Lee work force occupational category as compared to that group's representation in the local CLF occupational category without regard to pay level.

Note 2: CLF data do not break out EEO groups by pay levels within occupational categories



Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force

Figure III.7: Black Men Representation in  
GM/GS-13 Through GM/GS-15  
Administrative Occupations

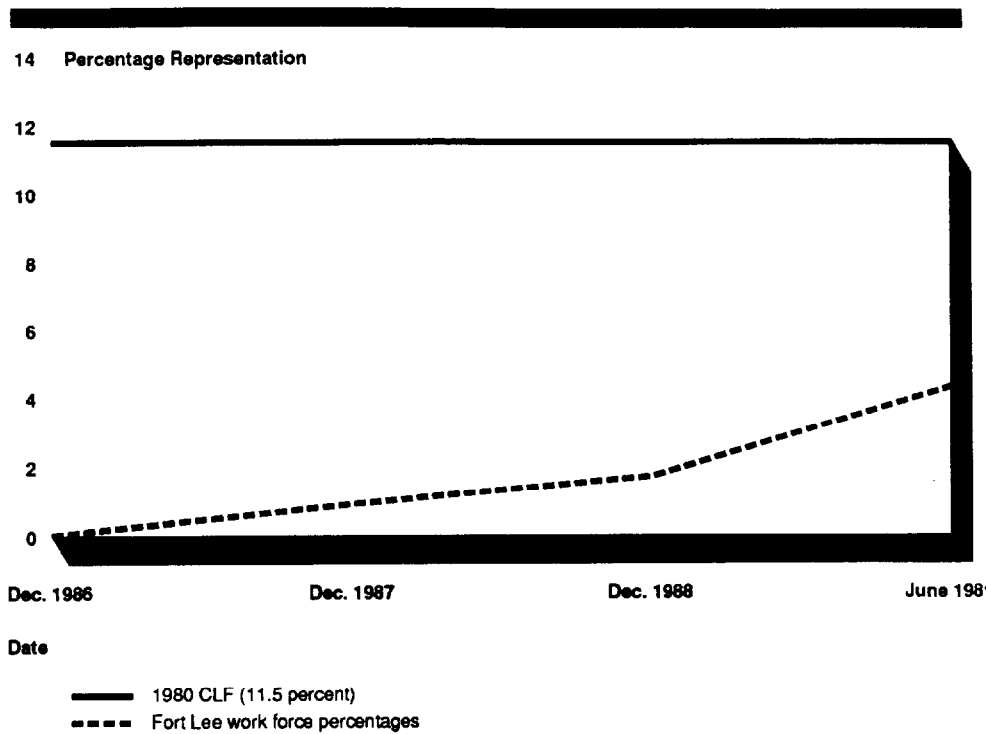


Note 1: Percentage representation is the rate that the applicable EEO group is represented in the Fort Lee work force occupational category as compared to that group's representation in the local CLF occupational category without regard to pay level.

Note 2: CLF data do not break out EEO groups by pay levels within occupational categories.

Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force

**Figure III.8: Black Women  
Representation in GM/GS-13 Through  
GM/GS-15 Professional Occupations**

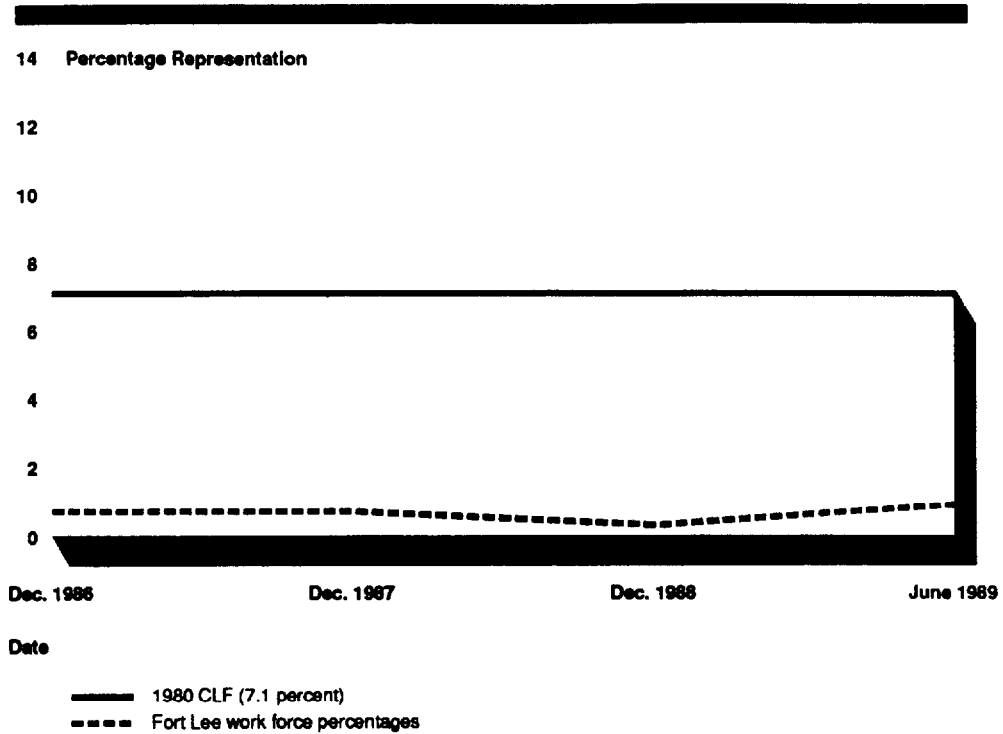


Note 1: Percentage representation is the rate that the applicable EEO group is represented in the Fort Lee work force occupational category as compared to that group's representation in the local CLF occupational category without regard to pay level.

Note 2: CLF data do not break out EEO groups by pay levels within occupational categories.

**Appendix III  
Representation of EEO Groups in Fort Lee  
Labor Force**

**Figure III.9: Black Women  
Representation in GM/GS-13 Through  
GM/GS-15 Administrative Occupations**



Note 1: Percentage representation is the rate that the applicable EEO group is represented in the Fort Lee work force occupational category as compared to that group's representation in the local CLF occupational category without regard to pay level.

Note 2: CLF data do not break out EEO groups by pay levels within occupational categories

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