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United States General Accounting Office

GAO

Report to the Honorable
Mike Lowry, House of Representatives

October 1987

EQUAL EMPLOYMENT OPPORTUNITY

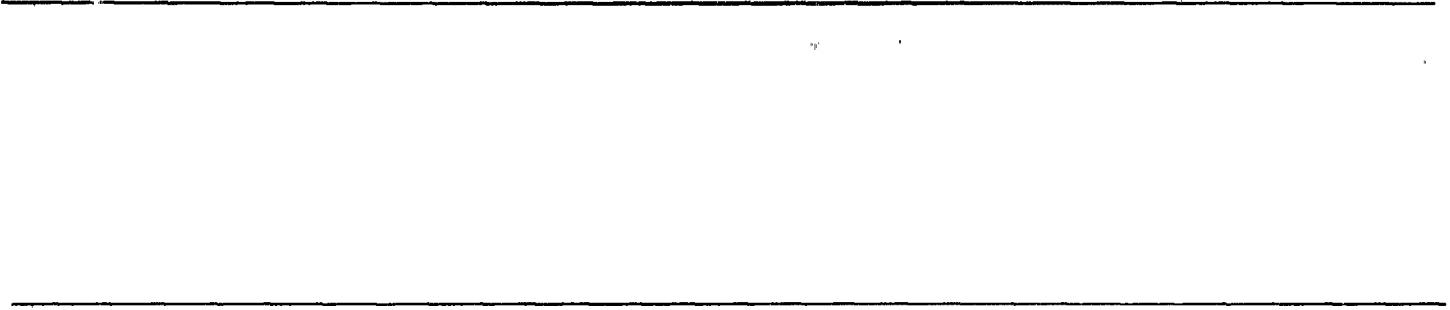
Some Racial Imbalance in SSA Region X, Better Data and Remedies Needed



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Human Resources Division

B-227565

October 13, 1987

The Honorable Mike Lowry
House of Representatives

Dear Mr. Lowry:

You asked us to obtain information on the employment status of black employees in Region X of the Social Security Administration (SSA), an agency of the Department of Health and Human Services (HHS). Your request was prompted by concerns brought to your attention about whether equal employment opportunity (EEO) exists for this group. Region X, located in Seattle and 1 of 10 SSA regional offices, includes Alaska, Idaho, Oregon, and Washington.

The 1972 amendments to the Civil Rights Act of 1964 established a policy to eliminate the historical underrepresentation of women and minorities in the federal work force. The Equal Employment Opportunity Commission (EEOC) is responsible for enforcing this policy. EEOC requires federal agencies to submit reports and employment data to assess the effectiveness of their affirmative action programs. In SSA's Region X, the instruments used to meet these requirements were (1) a 5-year affirmative action plan, called the multiyear plan, which was to include numerical goals and timetables; (2) annual accomplishment and update reports, which were to combine information on objectives achieved and adjustments to the multiyear plan based on prior years' accomplishments; and (3) a compilation of race and sex data for hiring, promotions, and reassignments.

We collected data on personnel actions and the EEO work-force profile for blacks, reviewed Region X's affirmative action plans, and interviewed responsible Region X officials. This enabled us to develop information relating to black employees on

- representation of black males and females in Region X's three most populous job series, targeted in the region's multiyear affirmative action plan for 1982-86;
- the adequacy of the region's annual accomplishment and update reports; and

- the adequacy of race and sex data collected on applicants for competitive vacancy announcements and used to monitor affirmative action efforts for underrepresented groups.¹

Both the SSA Region X work force and the civilian labor force in the Seattle area included a small ratio of blacks. Because of the relatively small numbers, in most cases an increase of one or two employees could change a minority group's status from that of being underrepresented to being fully represented. SSA data showed that as of September 1981 and September 1986 blacks were underrepresented in some grades/grade bands in certain job series. But, where underrepresentation existed for blacks, Region X's affirmative action plan did not fully comply with HHS and/or EEOC requirements.

For example, the plan did not include numerical goals and timetables for underrepresented minority groups, including blacks, nor a focused strategy for remedying underrepresentation. Further, the region's annual accomplishment and update reports lacked required narratives. Also, the region did not compile the race and sex data needed to help detect any artificial barriers to equal opportunity for minority groups, including blacks. These findings were similar to those in our report on SSA headquarters' affirmative action program, Affirmative Action: Social Security Can Do More to Improve Blacks' Representation in Its Work Force (GAO/HRD-87-2, Jan. 2, 1987).

Our findings relating to these issues in Region X are summarized below and discussed in more detail in appendix I.

Blacks Underrepresented in Some Grades in Three Primary Job Series

According to SSA employment data as of September 30, 1981, 1,288 staff were covered by Region X's multiyear plan. At the time, these included 14 black male (1.0 percent) and 46 black female (3.5 percent) employees. As of September 30, 1986, total employment was 1,412 and the number of black males, 16 (1.1 percent) and black females, 49 (3.5 percent).

Black males, according to the multiyear affirmative action plan of July 1982, were underrepresented in three grades/grade bands in two of the region's three "mainstream" job series (the most populous with opportunities for advancement) when compared with the appropriate civilian

¹According to EEOC, underrepresentation exists when a minority group's rate of employment in an agency is less than the group's rate of availability in the civilian labor force from which the agency recruits staff. When a minority group's rate of employment is equal to or greater than its rate of availability in the appropriate civilian labor force, it is fully represented.

labor force rates.² These positions, which regional officials targeted for affirmative action, were:

- the general schedule (GS)-105 (social insurance administrator) job series at grade 11 and grade band 13-15 and
- the GS-998 (claims clerical) job series at grade band 5-8.

Black females were underrepresented and targeted for affirmative action only in grade band 13-15 in the social insurance administrator job series, the multiyear plan stated.

As of September 30, 1986, SSA data showed that, in Region X,

- black males' and black females' employment rates remained less than the national civilian labor force rates in grade band 13-15 of the social insurance administrator job series;
- no black males were employed in the claims clerical job series at grade band 5-8; and
- for grade 11 in the social insurance administrator job series, the number of black males increased, and this group was fully represented.

In the job series/grade bands in which blacks were underrepresented, their status could change to full representation if one or two blacks were added to the rolls at the appropriate grade levels.

Affirmative Action Plan Lacked Specific Strategies to Remedy Underrepresentation

As required by EEOC guidelines, the Region X multiyear affirmative action plan identified the job series and grade levels in which women and minority groups were underrepresented. The plan estimated the total numbers of expected vacancies to occur and targeted underrepresented minority groups for internal promotions/reassignments. For its three mainstream job series, according to the multiyear plan, no hiring outside of SSA was authorized.

Contrary to EEOC requirements, HHS did not require SSA and its components to include numerical goals and timetables in their multiyear affirmative action plans. But, beginning in fiscal year 1984, HHS directed its components, including SSA, to include these measurable criteria in their annual accomplishment and update reports. The Office of Civil Rights and Equal Opportunity in SSA headquarters established numerical

²Regional civilian labor force rates are used for comparison with SSA Region X employment rates for positions up to GS-12; national civilian labor force rates are used for GS-13 to -15 positions

goals and timetables for SSA regional offices for fiscal years 1984 to 1986. SSA Region X officials did not, however, incorporate these goals and timetables in their updated affirmative action strategies for improving the representation of targeted minority groups, including blacks, nor report on whether annual goals were achieved.

Also lacking in Region X's multiyear affirmative action plan were specific strategies for enhancing the advancement of blacks, such as providing better information on how to apply for internal vacancies and how to improve their competitiveness for promotion.

In relation to skills assessment and development activities, although required by HHS directives, the plan did not include for under-represented groups, including blacks, specific training enrollment strategies, numerical enrollment goals, or the names of ongoing or planned training programs to enhance advancement opportunities available to Region X staff.

Annual Accomplishment and Update Reports Did Not Show Adjustments to Multiyear Plan

Not enough information was provided in the annual Region X affirmative action accomplishment and update reports for fiscal years 1984-85 for us to determine whether the region achieved the planned activities in each fiscal year. Nor could we tell how the affirmative action plan for the succeeding year was modified as a result of the previous fiscal year's accomplishments. For example, the reports provided no data on the numbers of minorities, including blacks, reassigned to bridge positions (which enable employees to move from clerical to professional careers) or participating in skills development activities during the fiscal year.

The reports, which combine an accomplishment report and an updated affirmative action plan, were requested annually by the Acting Deputy Commissioner for Management and Assessment at SSA headquarters. Used to obtain yearly data from SSA Region X on how its affirmative action efforts were progressing, the reports we examined provided little narrative information on specific accomplishments during the fiscal year. We could not, moreover, trace the data provided back to the multiyear plan.

Similar concerns regarding the fiscal year 1986 report were raised by an SSA headquarters official. In an April 1986 memorandum to the Regional Commissioner, the Acting Deputy Commissioner for Management and Assessment in SSA headquarters recommended that Region X's fiscal

year 1986 accomplishment and update report be revised because it did not conform with SSA headquarters' instructions. SSA Region X officials did not, however, revise the report to accommodate the Acting Deputy Commissioner's recommendations.

Data on Race and Sex of Applicants Incomplete

Although EEOC and HHS have issued requirements for collecting applicant data for job vacancies, SSA's Region X did not fully comply in collecting race and sex data for all applicants. According to Region X officials, race and sex information is compiled for individuals who make the best-qualified lists and those selected to fill vacant positions. But these data are not compiled for individuals in other stages of the competitive selection process—the potential internal applicant pool, actual applicants, and eligible applicants.

Because complete applicant race and sex data are not compiled and analyzed in SSA Region X, management officials cannot determine whether underrepresented minority group members are applying for vacancies at rates comparable to their proportions in the work force. Also, officials do not know whether the rates and numbers of minorities who make the best qualified lists are commensurate with the rates and numbers of those qualified to apply for vacancies and those who did apply. Without complete applicant data, Region X officials cannot determine whether disparities exist for minority groups and make the required barrier analyses. These steps are necessary to determine if artificial obstacles prevent minorities from achieving a fair share of the Region's hiring, promotion, reassignment, and training opportunities.

Recommendations

To bring SSA Region X into compliance with HHS and EEOC affirmative action requirements, the Commissioner of Social Security should direct the SSA Region X Commissioner to

- develop an affirmative action strategy to remedy underrepresentation that incorporates the annual numerical goals and timetables established by SSA's Office of Civil Rights and Equal Opportunity;
- compile race and sex data on all internal applicants at each stage of the competitive process for filling job vacancies; and
- use required race and sex data to identify barriers to advancement by minority groups.

To maximize the effectiveness of Region X's affirmative action efforts, the Commissioner of Social Security should direct the SSA Region X Commissioner to report

- annual affirmative action accomplishments in a narrative that links accomplishments with long-term (multiyear plan) objectives and
- the success of planned skills development activities in aiding the mobility of targeted minority group members.

Agency Comments

HHS, in commenting on a draft of this report, agreed with most of our recommendations. As a result of HHS comments, we revised our report and one proposed recommendation to recognize that numerical goals and timetables for remedying underrepresentation exist. However, they need to be included in affirmative action strategies. HHS said it believed that SSA Region X had been doing what we recommended regarding reporting on the success of planned skills development activities. We believe that the data reported are not sufficient to determine whether program participants are from targeted underrepresented groups.

As arranged with your office, unless its contents are announced earlier, we plan no further distribution of this report until 14 days from its issue date. At that time, we will send copies to the Secretary of HHS, the Commissioner of Social Security, the SSA Region X Commissioner, and other interested parties and make copies available to others on request.

Sincerely yours,



Richard L. Fogel
Assistant Comptroller General

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Abbreviations

EEO	equal employment opportunity
EEOC	Equal Employment Opportunity Commission
GS	General Schedule
HHS	Department of Health and Human Services
SSA	Social Security Administration

Equal Employment Opportunity: Some Racial Imbalance in SSA Region X, Better Data and Remedies Needed

Introduction

Representative Mike Lowry asked us to review the employment status of black employees in Region X of the Social Security Administration (SSA), an agency of the Department of Health and Human Services (HHS). Because of concerns raised over recruitment, hiring, and promotions, we developed information on

- representation of black males and females in Region X's three main-stream job series (the most populous with opportunities for advancement) targeted in the region's multiyear affirmative action plan for 1982-86;
- the adequacy of the annual accomplishment and update reports, and
- the adequacy of race and sex data collected on applicants for competitive vacancy announcements and used to monitor affirmative action efforts for underrepresented groups.

Region X, located in Seattle and 1 of 10 SSA regional offices, is divided into three geographic areas to service Alaska, Idaho, Oregon, and Washington. Each regional office includes a network of district offices, branch offices, and teleservice centers, which serve as the contact between SSA and the public.

Affirmative Action Programs in the Federal Government and SSA

In 1972, the Congress amended the Civil Rights Act of 1964 to require federal agencies to develop and implement affirmative action programs. The objective of this requirement was to overcome the lingering effects of historical discrimination in the federal government and assure equal employment opportunity (EEO) for women and minority groups, including Hispanics, Asian Americans, American Indians, and blacks. The Equal Employment Opportunity Commission (EEOC) is the principal federal agency for EEO enforcement.

Under EEOC Management Directive 707, effective January 1981, federal agencies must determine whether underrepresentation exists in specific positions and grade levels. Agencies are to compare minority groups' rates of employment within their work forces with each group's rate of availability in the national, regional, or local civilian labor force, depending on the area from which the agency recruits to fill specific positions. Underrepresentation exists when a minority group's rate of employment in a federal agency's work force is less than the group's rate of availability in the appropriate civilian labor force. Agencies must set numerical goals and timetables to hire, promote, and/or reassign women and minority group members to positions and grades in which

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they are underrepresented. The Office of Civil Rights and Equal Opportunity in SSA headquarters is the focal point for SSA's affirmative action planning and reporting.

In SSA's Region X, a region-wide multiyear (long-range) affirmative action plan was approved July 8, 1982. Each of the three service areas within the region also prepared plans. The Regional Commissioner is the affirmative action plan officer for the region, responsible for developing and implementing the plan in accordance with federal and agency regulations. The Civil Rights and Equal Opportunity Manager serves as the chief advisor to the Regional Commissioner for EEO matters and provides EEO-related services. These include processing discrimination complaints, providing technical assistance in EEO planning to all management levels, and monitoring and evaluating civil rights and EEO activities.

According to SSA employment data, a total of 1,288 staff were covered by the Region X plan, as of September 30, 1981. At the time, 14 black males (1.0 percent) and 46 black females (3.5 percent) were employed. As of September 30, 1986, total employment in Region X was 1,412, and black males numbered 16 (1.1 percent) and black females, 49 (3.5 percent).

Region X's affirmative action plan focused on mainstream job series—that is, the most populous job series with opportunities for advancement. In the region, as of both September 30, 1981, and September 30, 1986, the majority of staff were employed in the three mainstream job series identified in the affirmative action plan: General Schedule (GS)-105, social insurance administrator; GS-962, contact representative; and GS-998, claims clerical (see table I.1).

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Table I.1: Black Employees and Total Employees for Three Mainstream Job Series in SSA Region X (As of September 30, 1981, and September 30, 1986)

Mainstream job series and grade bands	SSA Region X employees					
	Total		Black males		Black females	
	1981	1986	1981	1986	1981	1986
GS-105 Social insurance administrator						
Grades 1-4	0	0	0	0	0	0
5-8	36	5	0	0	1	0
9-12	610	721	7	5	17	21
13-15	50	51	0	2	1	1
All grades	696	777	7	7	19	22
GS-962: Contact representative						
Grades 1-4	3	2	0	0	1	0
5-8	209	289	2	6	14	19
9-12	7	9	0	1	0	0
13-15	0	0	0	0	0	0
All grades	219	300	2	7	15	19
GS-998 Claims clerical						
Grades 1-4	104	99	1	0	3	3
5-8	160	107	0	0	5	1
9-12	0	0	0	0	0	0
13-15	0	0	0	0	0	0
All grades	264	206	1	0	8	4

Objectives, Scope, and Methodology

We analyzed Region X's multiyear affirmative action plan of 1982 to determine if it complied with federal requirements. In addition, we reviewed the region's annual accomplishment and update reports dated January 1984 (the first year one was required) and March 1985 and a draft report dated January 1986 to determine (1) the progress of affirmative action efforts in Region X, (2) any adjustments made to the multiyear affirmative action plan, and (3) the extent to which such plans were being implemented in the region. According to an SSA official, fiscal year 1987 accomplishment and update reports were not prepared by the SSA regional offices because neither EEOC nor HHS directed SSA to request them.

We reviewed EEO work-force profile data for Region X staff overall and for the three mainstream job series included in the affirmative action plans. Also, we examined information on various Region X personnel transactions in the mainstream job series for fiscal years 1985 and 1986, including new hires, reassignments, and promotions.

To obtain explanations of how the affirmative action program was implemented and whether SSA Region X complied with EEOC and HHS requirements, we held discussions with responsible Region X officials, including the Acting Regional Commissioner and the Civil Rights and Equal Opportunity Manager. These officials also provided explanations of the personnel data we reviewed. We tested the accuracy of SSA data where corroborating evidence was available. We did not, however, assess the reliability of SSA Region X work-force EEO profile data nor other computerized personnel data.

We did our review from August 1986 to March 1987. Except as noted, our work was done in accordance with generally accepted government auditing standards.

Affirmative Action Plan Lacked Specific Strategies to Remedy Underrepresentation

In both the SSA Region X work force and the Seattle civilian labor force, there was a small proportion of black employees. Because of the relatively small numbers involved, in most cases an increase of one or two employees in a job series/grade band could change a minority group's status from that of being underrepresented to being fully represented.

As required by EEOC guidelines, the Region X multiyear affirmative action plan identified the job series and grade levels in which women and minority groups were underrepresented. The plan estimated the number of expected vacancies to occur and targeted underrepresented minority groups for internal promotions/ reassignments.¹ In addition, the plan discussed some general precepts for improving the representation of minority groups.

But the multiyear plan did not include numerical goals and timetables for blacks who were underrepresented in several grades for the three mainstream job series we reviewed. Also, it lacked specific strategies for enhancing the advancement of minorities, including blacks, such as specific information on how to apply for internal vacancies and how to improve their competitiveness.

Job Series and Grades in Which Blacks Were Underrepresented

Region X's multiyear affirmative action plan specified that, as of September 30, 1981, black males were underrepresented in three grades/grade bands in two of the three mainstream job series. It targeted these for affirmative action (see table I.2). The positions were as follows:

¹The plan stated that, for its three mainstream job series, no hiring outside of SSA was authorized.

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- GS-105 (social insurance administrator) job series, grade band 13-15, in which no black males were employed. The national civilian labor force rate was 5.2 percent,² indicating that three black males should have been employed to achieve full representation.
- GS-105 (social insurance administrator) job series, grade 11, in which no black males were employed. The Seattle civilian labor force rate was 0.8 percent, indicating that, if one black male were employed, full representation would be achieved. (As shown in table I.2, black males were not underrepresented in grade band 9-12 in this job series.)
- GS-998 (claims clerical) job series, grade band 5-8, in which no black males were employed. The Seattle labor force rate was 0.8 percent, indicating that two black males should have been employed to achieve full representation.

Table I.2: Employment Rates of Blacks for Three Mainstream Job Series (As of September 30, 1981, and September 30, 1986)

Category	Employment rates ^a			
	Black males		Black females	
	1981	1986	1981	1986
Rates in percents				
Civilian labor force				
Seattle area	0.8	0.9	0.6	0.7
National	5.2	4.9	4.8	4.8
SSA Region X work force				
GS-105 (Social insurance administrator)				
Grades 5-8	[0]	[0]	2.7	[0]
9-12	1.1	[0.7]	2.7	2.9
13-15	[0]	[3.9]	[2.0]	[2.0]
All grades	1.0	0.9	2.7	2.8
GS-962 (Contact representative)				
Grades 1-4	[0]	[0]	33.0	[0]
5-8	0.9	2.1	6.6	6.6
9-12	[0]	11.1	[0]	[0]
All grades	0.9	2.3	6.8	6.3
GS-998 (Claims clerical)				
Grades 1-4	0.9	[0]	2.8	3.0
5-8	[0]	[0]	3.1	0.9
All grades	0.3	0	3.0	1.9

^aFigures in brackets identify underrepresentation based on comparisons of SSA employment rates with Seattle area or national civilian labor force data

²The national civilian labor force availability rates were used for grade levels 13 to 15 and the regional (Seattle) civilian labor force availability rates for grade 12 and below

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Black males also were underrepresented in the GS-962 (contact representative) job series at grade bands 1-4 and 9-12, according to the EEO workforce profile for Region X as of September 30, 1981. However, only three employees held positions in grade band 1-4 and seven in grade band 9-12. Because of so few total positions and the minimal number of potential vacancies, the plan did not target these grade bands for affirmative action.

Black females were underrepresented and targeted for affirmative action in only one grade band in one mainstream series, according to the Region X affirmative action plan. That was the GS-105 (social insurance administrator) job series at grade band 13-15. As of September 30, 1981, one black female occupied a position in this grade band for an employment rate of 2.0 percent, SSA data showed. The national civilian labor force rate was 4.8 percent, which meant that three black females would have to be employed for this minority group to be fully represented. As with black males, data supporting the plan showed that black females also were underrepresented in GS-962 (contact representative) jobs at grade band 9 to 12. Because only seven employees held positions in this grade band, black females were not targeted for affirmative action.

As of September 30, 1986, for grade band 13-15 in the GS-105 (social insurance administrator) job series, SSA data showed two black males (3.9 percent) and one black female (2.0 percent) employed. The national civilian labor force rates were 4.9 percent and 4.8 percent, respectively. According to this criteria, one additional black male and two additional black females would have to be employed in this grade band of the job series for these minority groups to be at full representation.

For grade 11 in the GS-105 (social insurance administrator) job series, two black males (1.9 percent) were employed as of September 30, 1986, SSA data showed. Since the Seattle civilian labor force rate was 0.9 percent, full representation had been achieved. For grade band 9-12 in this job series, however, the employment rate had fallen to 0.7 percent, so that two more black males would have to be employed to reach full representation.

In the GS-998 (claims clerical) job series, grade band 5-8, as of September 30, 1986, no black males were employed. The Seattle civilian labor force rate was 0.9 percent, which meant that one black male would have to be employed for this minority group to achieve full representation.

Ways to Improve Representation Not Included in the Multiyear Plan

Although Region X's multiyear plan made broad statements on affirmative action, it did not include specific language on internal recruitment goals and timetables, internal movement opportunities, or skills assessment and development activities. According to EEOC, numerical hiring goals and timetables are key elements of an affirmative action plan because they reflect management's commitment to overcoming underrepresentation, while giving managers measurable objectives for the recruiting, hiring, and promoting of staff.

According to Management Directive 707, goals are not rigid quotas, but flexible numerical hiring targets intended to remedy historical underrepresentation. EEOC requires agencies and departments to set numerical goals for each underrepresented occupation or employment category with 100 or more positions. In a December 9, 1983, memorandum from the Assistant Secretary for Personnel Administration, HHS informed all subordinate agencies that such goals were required beginning in fiscal year 1984. The Office of Civil Rights and Equal Opportunity in SSA headquarters established numerical goals and timetables for the SSA regional offices for fiscal years 1984-1986. SSA Region X officials, however, did not incorporate these numerical goals and timetables into the region's updated affirmative action strategies to improve the representation of targeted minority groups, including blacks. Also, they did not report annually on whether these goals were achieved.

The only references to numerical goals by SSA Region X officials in the region's affirmative action planning for its mainstream job series were general ones in the region's multiyear plan in 1982. For the GS-105 (social insurance administrator) job series, the plan stated

"Emphasis will be placed on encouraging women, minorities and handicapped individuals to file for higher graded positions in accordance with their representation in the previous grades."

Specific numbers, however, were not discussed. For the GS-962 (contact representative) job series, the plan referred to internal recruitment goals as "Grades 4/5—Hispanic males—2.0 percent based on representation in 998 series," without further discussion. For the GS-998 (claims clerical) job series, the section on internal recruitment goals was also brief, unclear, and without further discussion: "GS 5-8—Black males—1.0 percent; Hispanic males—2.1 percent."

Although opportunities for SSA employees to advance existed in bridge positions (paraprofessional positions that allow employees to move from

clerical to professional career paths after gaining requisite experience), the multiyear plan did not specify how staff would be encouraged to apply or compete for these opportunities. For the social insurance administrator series, the plan mentioned that employees were eligible for placement in most SSA program-related positions and that SSA employees in other job series were likewise eligible for the social insurance administrator positions. The plan identified the claims clerical series only as a bridge position for staff employed in five other clerical job series.

In relation to skills assessment, training, and development activities, the Region X multiyear plan for the three mainstream job series stated the following objectives:

- To make effective use of all available training and development to correct underrepresentation in the work force and
- To recommend the establishment of or to provide additional training and development activities as needs are identified, to the extent that resources are available.

The plan identified and targeted underrepresented minority groups and generally discussed the skills and experience needed for employees to advance. But it did not include for underrepresented groups specific training enrollment strategies, numerical enrollment goals, or the names of ongoing or planned training programs appropriate to enhance advancement opportunities available for Region X staff.

Accomplishment and Update Reports Did Not Show Adjustments to the Multiyear Plan

Not enough information was included in Region X's affirmative action accomplishment and update reports for fiscal years 1984 and 1985 for us to determine (1) whether Region X achieved the planned activities for each fiscal year or (2) how the affirmative action plan for the succeeding year was modified as a result of the previous fiscal year's accomplishments.

HHS guidelines to its components in December 1983 and November 1984 required them to provide narrative evaluations or analyses of key elements of how their affirmative action plans were implemented. These reports, which combined an accomplishment report and an updated affirmative action plan, were requested annually by the Acting Deputy Commissioner for Management and Assessment in SSA headquarters. They were used to obtain data from Region X on how its affirmative action efforts were progressing.

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Region X's fiscal years 1984 and 1985 accomplishment and update reports were accepted by SSA headquarters without question, according to Region X officials. But the fiscal year 1986 report was not accepted as submitted, because, according to an SSA headquarters representative, it did not conform with SSA headquarters' instructions. It provided little narrative information on specific accomplishments during the fiscal year. Furthermore, data in it could not be readily traced back to the multiyear plan. For example, the accomplishment reports did not give the numbers of minorities reassigned to bridge positions or participating in training programs during the fiscal year.

In its fiscal year 1985 report, Region X reported on internal movement^J accomplishments by minorities in the mainstream job series. But, although the race of those promoted/reassigned was reported, the data provided were not complete because the sex of the individuals was not included. Also, as the report's reference to "internal sources" of recruitment was not defined, it was unclear whether the individuals came from within SSA Region X or other SSA offices. Promotions and reassignments were not mentioned in the fiscal year 1984 report.

Staff hires and separations were discussed in the fiscal years 1984 and 1985 accomplishment reports, but only total numbers by job series or position and nature of appointment (full time/part time) were included. Neither report fully discussed the race or sex of the hires and separations.

Concerning Region X's fiscal year 1986 update and accomplishment report, an SSA headquarters official raised issues similar to those we raised for 1984 and 1985. Saying the report did not conform with the SSA headquarters instructions, the Acting Deputy Commissioner for Management and Assessment recommended in an April 1986 memorandum to the Regional Commissioner that it be revised. The headquarters official pointed out several shortcomings, including:

- No estimate was made for internal and external projected vacancies for each mainstream job series and grade band where underrepresentation existed.
- As total numbers of employment opportunities (outside hiring, promotions, competitive reassignments) by job series and grade band were not

^JAccording to the SSA Region X Civil Rights and Equal Opportunity Manager, "internal movement" means the promotion and/or reassignment of staff to other positions within Region X.

provided, goal accomplishments and the overall success of recruiting strategies could not be determined.

- Recruitment strategies did not distinguish among mainstream job series.
- The update plan lacked a "skills assessment and development" section.

But Region X did not revise its fiscal year 1986 report to accommodate the Acting Deputy Commissioner's recommendations, because, according to the Acting Regional Commissioner, when Region X was told its report needed revision, fewer than 6 months remained in the fiscal year.

Data on Race and Sex of Applicants Incomplete

Although EEOC and HHS have issued procedures for collecting applicant data for job vacancies, SSA's Region X did not fully comply in collecting race and sex data for all applicants. The region compiled race and sex information for applicants who made the best-qualified lists⁴ and those selected to fill vacant positions, according to regional officials, but not for individuals in other stages of the application process.

Without complete data, Region X could not make required barrier analyses to determine possible artificial obstacles that would prevent minorities from achieving fair representation in the region's hiring, promotion, reassignment, and training participation rates. Examples of these obstacles include: use of unnecessary educational or certification requirements, consistent exclusion by rating panels of minorities and women, and lack of an effective mechanism for identifying and using minority and female recruitment sources.

Persons employed by SSA must compete to be selected for designated reassignments or promotions. According to SSA guidelines, race and sex data were to be collected for persons in each stage of the competitive selection process, including:

- the potential applicant pool (all persons within the area of consideration⁵),
- actual applicants for vacancies,
- qualified applicants,⁶

⁴The best-qualified candidates are applicants who rank highest based on numerical scores received during the competitive process.

⁵The area of consideration includes employees in the SSA offices/geographic areas from which SSA region X will accept applications for the vacancies.

⁶Qualification determinations are based on the Office of Personnel Management's minimum qualifications specified in Civil Service Handbooks x-118 and x-118c.

- best qualified candidates, and
- persons selected to fill vacancies.

SSA Region X did not compile race and sex data for the first three stages of the competitive selection process as outlined above, even though most applicants for vacancies were employed by the region and their race and sex were a matter of record, available for compilation and analysis.

That the collection of applicant data is critical in identifying possible barriers to full employment of underrepresented groups and in monitoring internal and external recruitment efforts is specified in EEOC Management Directive 707, effective January 1981. It requires the collection of race and sex data at each stage of the competitive selection process. Collection of these data also is required by the Uniform Guidelines on Employee Selection Procedures, effective September 25, 1978. These guidelines, which apply to all federal agencies, call for systematic procedures to identify employment practices that have an adverse impact on women and minorities.

In March 1982, HHS required its subordinate agencies such as SSA to begin to collect applicant data for that fiscal year. This requirement, contained in HHS Circular 1608-1/720-2, anticipated that detailed analyses would be required in later years. In Circular 1608-2/720-3 of November 26, 1984, HHS directed subordinate agencies to develop systems for analyzing applicant data. Because SSA Region X did not compile and analyze complete applicant flow data, management officials could not determine whether underrepresented minority group members were applying for vacancies at rates comparable to their numbers in the work force. Also officials did not know whether the rates and numbers of minorities who made the best-qualified lists were commensurate with the rates and numbers of those qualified to apply for vacancies. Without compiling complete applicant data, Region X officials could not determine whether there were barriers obstructing minority groups from receiving fair consideration at all steps in the competitive selection process.

Recommendations

To bring SSA Region X into compliance with HHS and/or EEOC affirmative action requirements, the Commissioner of Social Security should direct the SSA Region X Commissioner to

- develop an affirmative action strategy to remedy underrepresentation that incorporates the annual numerical goals and timetables established by SSA's Office of Civil Rights and Equal Opportunity,

- compile race and sex data on all internal applicants at each stage of the competitive process for filling job vacancies, and
- use required race and sex data to identify barriers to advancement by minority groups.

To maximize the effectiveness of Region X affirmative action efforts, the Commissioner of Social Security should direct the SSA Region X Commissioner to report

- annual affirmative action accomplishments in a narrative that links accomplishments with long-term (multiyear) objectives and
- the success of planned skills development activities in aiding the mobility of targeted minority group members.

Agency Comments

On September 4, 1987, HHS commented on a draft of this report (see app. II) and with two exceptions agreed with our recommendations and described the actions it was taking to implement them.

HHS in its comments pointed out that our draft report did not recognize that numerical goals and timetables had been drawn up for fiscal years 1984-86. We revised the draft report to acknowledge that numerical goals and timetables had been established by SSA headquarters' Office of Civil Rights and Equal Opportunity for SSA's regional offices, for these 3 fiscal years. Region X officials had not, however, incorporated these annual goals and timetables into their affirmative action strategies to remedy underrepresentation.

In regard to our recommendation that the Regional Commissioner report on the success of planned skills development activities in aiding the mobility of targeted minority group members, HHS stated its belief that Region X had been doing this and cited two programs as having been successful in having a high percentage of minority participants. We are aware that data were prepared on the race, sex, and grade level of those selected to participate in the region's Positive Image Program and Job Enrichment Program for fiscal years 1985 and 1986. These data, did not, however, show the participants' job series; consequently, it was not possible to determine whether the minority and female participants were from the targeted underrepresented groups identified in the region's affirmative action plan.

Comments From the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

SEP 4 1987

Mr. Richard L. Fogel
Assistant Comptroller General
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Fogel:

The Secretary asked that I respond to your request for the Department's comments on your draft report, "Equal Employment Opportunity: SSA Region X Affirmative Action Efforts Could Be Improved." The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Richard E. Kuslow".

Richard E. Kuslow
Inspector General

Enclosure

COMMENTS ON THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ON
THE GENERAL ACCOUNTING OFFICE'S DRAFT REPORT ENTITLED
"EQUAL EMPLOYMENT OPPORTUNITY: SSA REGION X AFFIRMATIVE
ACTION EFFORTS COULD BE IMPROVED"

GAO Recommendation

That the SSA Region X Commissioner develop an affirmative action strategy to remedy underrepresentation by developing numerical goals and timetables.

Department Comment

Numerical goals and timetables for the region have been drawn up for fiscal year (FY) 1984, 1985, and 1986 and should have been available for review and discussion during the audit. Since the Social Security Administration (SSA) had not received instructions concerning FY 1987 goals, regional civil rights and equal opportunity officers were instructed to keep FY 1986 goals in place. Copies of the region's goals can be made available for your review upon request.

GAO Recommendation

Compile race and sex data on all internal applicants at each stage of the competitive process for filling job vacancies.

Department Comment

We concur in this recommendation; it will be implemented October 1 by the Seattle Regional Personnel Office (RPO), an arm of the Regional Director's Office. The RPO, which has jurisdiction over collection and array of job applicant data, has agreed to work with SSA in providing this information.

GAO Recommendation

Use required race and sex data to identify barriers to advancement by minority groups.

Department Comment

We concur; implementation of this recommendation started June 29 when we began to compile data on race, sex, and handicap for a barrier analysis. We will perform an analysis quarterly on an ongoing basis--more often, if needed.

GAO Recommendation

Report annual affirmative action accomplishments in a narrative that links accomplishments with long-term (multi-year) objectives.

Department Comment

We are aware that the lack of a detailed narrative accompanying the annual accomplishment and update reports has contributed to some misunderstandings regarding Region X's accomplishments. Beginning with the report for fiscal year 1987, we will include a detailed narrative. We have already begun to assemble the information and data which will be needed for the report.

GAO Recommendation

Report on the success of planned skills development activities in aiding the mobility of targeted minority group members.

Department Comment

We believe we have been doing this. Two such programs are our Positive Image Program and the Job Enrichment Program, which were in force during GAO's review. These programs have been very successful in having a high percentage of minority candidates participate. We have issued memoranda to managers directing them to place minorities in detailed assignments to assist them in developing skills needed to crossover to another position or to assume a higher grade. We will continue to insure that under-represented groups are included in all our skill development initiatives.

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