

GAO

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Report to the Honorable
Timothy Wirth, U.S. Senate

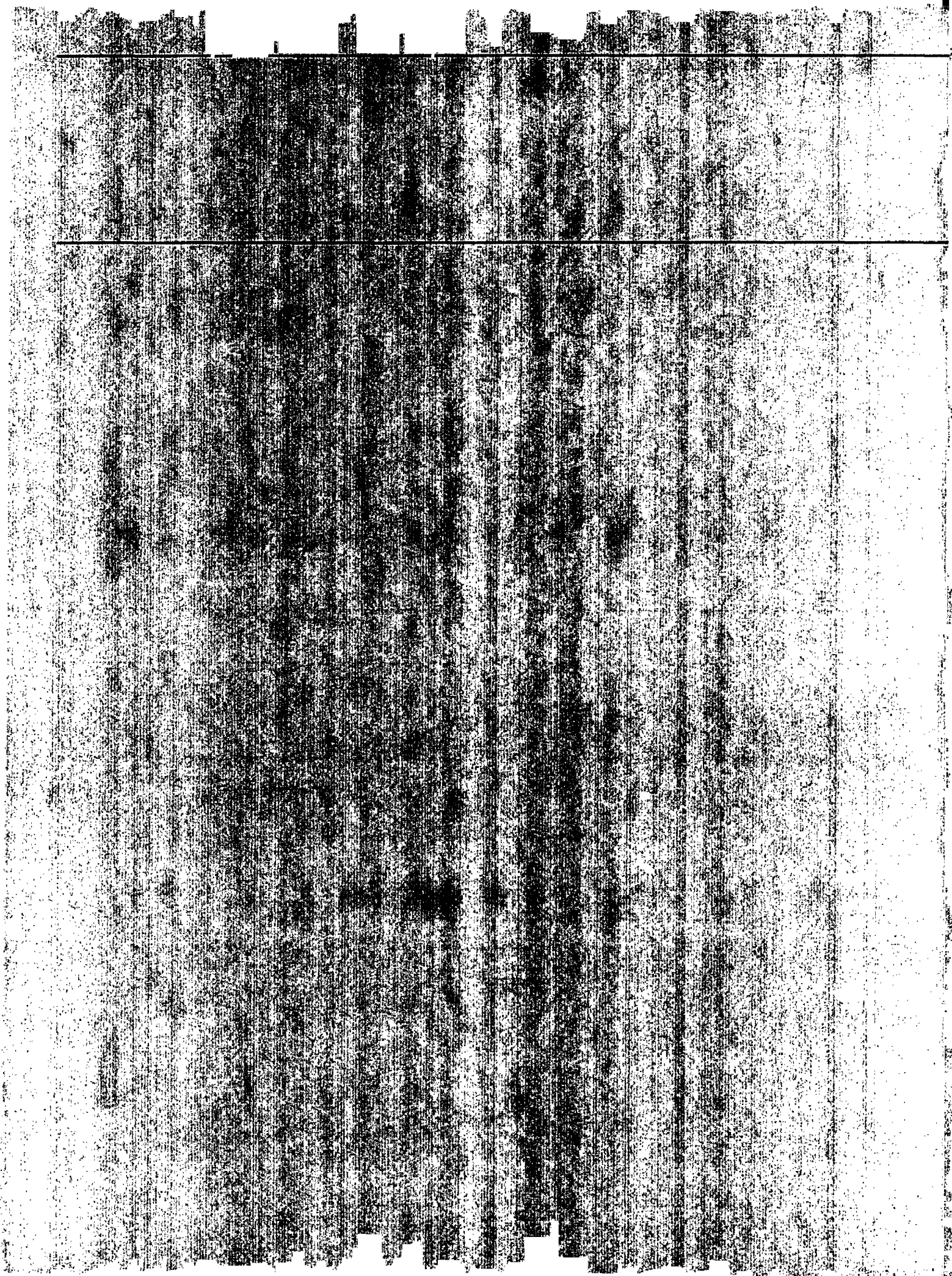
November 1990

HEALTH AND HUMAN SERVICES

Hispanic Representation and Equal Employment Practices in Region VIII



14284





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

142841

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November 20, 1990

The Honorable Timothy E. Wirth
United States Senate

Dear Senator Wirth:

In an October 4, 1989, letter, you expressed concerns about possible evidence of discriminatory hiring and promotion practices against Hispanics by the Department of Health and Human Services' (HHS) region VIII, located in Denver. Region VIII, 1 of 10 HHS regional offices, encompasses Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming.

Based on your letter and discussions with your office, we agreed to determine for selected fiscal years whether HHS region VIII

- employed Hispanics in representative numbers when compared with the regional civilian labor force (CLF);¹
- developed and implemented affirmative employment plans (AEPS) in accordance with federal guidelines;
- processed competitive vacancy announcements in accordance with federal policies and procedures; and
- in conjunction with HHS headquarters, processed formal discrimination complaints in compliance with federal policies and procedures.

In addition, we agreed to obtain data on certain other topics related to region VIII's Hispanics, including numbers of political appointees, informal discrimination complaints and grievances, unfair labor practices, adverse personnel actions, performance awards, training opportunities, and upward mobility.

We performed work from October 1989 to May 1990 at HHS region VIII offices in Denver and HHS headquarters in Washington, D.C. We interviewed HHS officials concerning the hiring and promotion of Hispanics, collected work-force profile and personnel data related to Hispanics, and reviewed AEPS, competitive vacancy announcements, and discrimination

¹CLF data include persons 16 years of age and over, excluding those in the Armed Forces, who are employed or seeking employment. These data are developed through the nation's census, which is conducted every 10 years. The data currently used were collected in 1980.

complaint procedures. Our review was done in accordance with generally accepted government auditing standards. Our findings are summarized below and detailed in appendix I.

Results in Brief

During fiscal years 1981, 1985, 1987, and 1989, the overall representation of Hispanic employees in the region VIII work force, including Indian Health Service (IHS) employees, exceeded the Hispanic representation in the regional civilian labor force.² Before fiscal year 1989, HHS only developed work-force data with IHS included. In fiscal year 1989, for the first time, work-force data were developed for region VIII both including and excluding IHS. As of September 30, 1989, region VIII's representation of Hispanics was 10.3 percent with IHS staff excluded and 6.0 percent with IHS staff included. These percentages exceeded the regional CLF rate of 5.5 percent for Hispanics.

Except for the Social Security Administration (SSA), region VIII operating divisions are not required to prepare regional AEPs because each employs fewer than 500 staff. Instead, HHS operating divisions at the national level monitor work-force data and implement equal employment opportunity requirements. Regional operating divisions rarely participated in preparing AEPs and accomplishment reports. Except for SSA officials, HHS headquarters operating division officials seldom communicated with the region VIII operating divisions about affirmative action issues.

Our review of 19 competitive vacancy announcements, issued from January 1987 to January 1990, showed that region VIII generally processed them in accordance with federal policies and procedures and that Hispanic applicants fared well in the competitive selection process. Except for SSA, however, the region has not compiled and analyzed race, national origin, and gender data on internal job applicants (those already employed by HHS). Consequently, the region did not have data to determine whether Hispanics applied for positions commensurate with their numbers in the regional work force. Moreover, some files were incomplete regarding how applicants were chosen for the best qualified list.

²IHS, a Public Health Service component comprising 44 percent of the region VIII work force, is required by law to give hiring preference to American Indians. As a result, 72 percent of IHS's employees are American Indians.

HHS headquarters generally followed policies and procedures prescribed by the Equal Employment Opportunity Commission (EEOC) in handling formal discrimination complaints. Complaint processing often exceeded EEOC's recommended time frame of 180 days; some cases took more than 3 years. HHS is working to expedite the processing of formal complaints.

Information on the other topics you requested us to review is included in appendix II.

Background

The Civil Rights Act of 1964 requires federal agencies to develop and implement affirmative action programs to eliminate the historic underrepresentation of minorities and women in the work force. EEOC is the federal agency responsible for monitoring federal affirmative employment programs. In 1981 and 1987, EEOC directed all federal agencies, including HHS, to develop 5-year AEPs that include affirmative employment targets, timetables, and program strategies to eliminate minority underrepresentation. EEOC publishes statistics on minority availability in the civilian labor force in professional, administrative, technical, clerical, and all other job categories combined. These statistics are currently based on data compiled during the 1980 census. For HHS region VIII, each minority group's rate of employment in specific employment categories is compared with its rate of availability in the Rocky Mountain Region civilian labor force, from which region VIII recruits to fill most positions.

HHS region VIII employed about 3,400 employees as of September 30, 1989. Our work-force analysis included the 2,851 employees in the region's white collar positions at grades 1 to 15. We excluded the 242 staff in wage board positions because all were employed in the Public Health Service. We excluded the 315 staff in the Commissioned Corps and 6 Senior Executive Service staff because HHS headquarters officials make these appointments.

Hispanic Representation in HHS Region VIII

As of September 30, 1989, total Hispanic representation in the HHS region VIII work force exceeded total Hispanic representation in the Rocky Mountain civilian labor force, both including and excluding IHS. When broken out by gender, grade level, and occupational category, the representation of Hispanics in Region VIII, with IHS included, was slightly lower in some categories than that in the regional civilian labor force. In most cases, however, hiring or promoting a few more Hispanics would have eliminated the underrepresentation.

For Hispanics overall as of September 30, 1989, no underrepresentation by gender or occupational category existed when work-force data from IHS were excluded. The only pocket of underrepresentation we noted when IHS data were excluded involved Hispanic women in grade band 13-15 professional positions. In this case if two Hispanic women were hired or promoted, the underrepresentation problem would have been resolved.

Although region VIII's Hispanic representation compared favorably with that of the civilian labor force according to 1980 census data, we caution that this information is dated. EEOC plans to publish work-force data based on the 1990 census in 1992.

Region VIII's Hispanic representation exceeded that of the civilian labor force for the 4 fiscal years we reviewed. From 1981 to 1987, the percentage of Hispanics in the region increased from 6.2 to 6.7. However, Hispanics' representation declined between 1987 and 1989, to 6.0 percent. According to regional officials, this decrease resulted from hiring freezes, budget constraints, and personnel ceilings.

When broken out by occupational category (professional, administrative, technical, clerical, and other), the representation of Hispanics in region VIII in fiscal year 1989, excluding IHS, exceeded that of the regional civilian labor force in all categories. When IHS was included, the representation of Hispanics for the 4 fiscal years covered in our review exceeded that of the regional civilian labor force in all but one category. In 1981, 1987, and 1989, the region's Hispanic representation in the technical job category (e.g., contact representative and claims examiner positions) was slightly less than in the civilian labor force. In fiscal year 1989, the CLF for technical positions was 4.5 percent, while the region VIII technical position work-force percentage was 4.22. As with the overall work force, the region's Hispanic representation declined between 1987 and 1989 in all job categories. (See pp. 15-20.)

Affirmative Employment Plans Not Required of Most Region VIII Operating Divisions

Except for SSA, HHS region VIII's operating divisions are not required to prepare AEPS because they have fewer than 500 employees. EEOC requires agencies of 500 or more employees to prepare AEPS, updates, and accomplishment reports. Region VIII operating divisions only occasionally participated with headquarters operating divisions in preparing national AEPS and accomplishment reports. No systematic method exists for region VIII operating divisions to participate in preparing these plans and reports.

HHS headquarters did not emphasize affirmative action and equal employment opportunity in region VIII and seldom communicated with regional officials about these issues. Moreover, about 3 years ago, the region changed from a full-time to a part-time equal employment opportunity manager for the Office of the Regional Director (SSA had its own equal employment opportunity manager during this period). Among other things, the region VIII equal employment opportunity manager is responsible for advising the regional director and operating division heads on equal employment opportunity policy and technical matters. In June 1990, however, because the current regional director is focusing more attention on affirmative action and equal employment opportunity, the region hired a full-time manager.

Because of the number of employees (1,066), region VIII SSA prepared regional multiyear AEPs and Federal Equal Opportunity Recruitment Program plans in 1982 and 1988. SSA also prepared a narrative accomplishment report on its AEP in 1989; for fiscal years 1983 through 1988, it prepared statistical accomplishment reports. In the 4 fiscal years we reviewed, SSA's total Hispanic representation exceeded that in the civilian labor force. Through the 1980s, SSA's Hispanic representation ranged from 8.9 to 10.2 percent, while the civilian labor force representation was 5.5 percent. (See pp. 22-24.)

Region VIII Met Most Competitive Vacancy Announcement Requirements

In processing competitive vacancy announcements, region VIII generally complied with federal policies and procedures. To determine whether the region followed applicable processing requirements, we selected and analyzed 19 vacancy announcements issued from January 1987 to January 1990,³ involving 24 positions, for which at least one Hispanic employee had applied. Although the region complied with most requirements, not all files contained the narrative comments required of the panel members who evaluated and ranked applicants to demonstrate how those considered best qualified were chosen. These panel members' comments are required by HHS region VIII policy as support for ratings of candidates' knowledge, skills, and abilities.

Also, except for SSA, region VIII did not compile and analyze internal applicant flow data (data on applicants' race, national origin, and sex). Accordingly, regional officials did not have the data to determine whether (1) Hispanic employees were applying for vacancies at rates comparable with their numbers in the work force or (2) the ratios of

³None of these announcements were for IHS positions.

Hispanic employees judged best qualified and selected for vacancies were commensurate with those of other minorities and nonminorities. Without compiling and analyzing applicant flow data, regional officials did not have data to determine whether minority groups were facing barriers to receiving fair consideration at all steps in the competitive selection process. (See pp. 24-26.)

Hispanics Fared Well in the Competitive Selection Process

On the basis of the 19 competitive vacancy announcements we reviewed, Hispanic employees fared well. Of the 232 applicants for the 24 positions we analyzed, 29 were Hispanic. Sixty-nine percent (20) of the Hispanic applicants made the best qualified list, and 24 percent (7) were selected for a position. In comparison, 59 percent (120) of the non-Hispanic applicants made the best qualified list, and 8 percent (17) were selected for a position.

To respond to your concerns that Hispanics were not being selected for upper-level positions, we examined the 93 grade 12 through 15 positions (excluding IHS positions) filled between January 1987 and December 1989. Of the 93 positions, according to HHS records, 8 (8.6 percent) were filled by Hispanics. This is somewhat below the 10.3-percent representation of Hispanics in the region VIII work force (excluding IHS) as of September 30, 1989, but significantly above the 5.5-percent CLF rate for Hispanics. Because applicant flow data were not compiled and analyzed, HHS officials could not tell us how many Hispanics applied or made the best qualified lists. (See p. 26.)

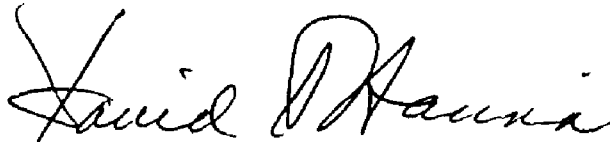
HHS Processed Formal Discrimination Complaints as Required

To determine whether HHS complied with federal administrative processing requirements for formal discrimination complaints, we examined the 10 official complaint files that were available out of a total of 14 discrimination complaints filed between 1980 and 1989 involving Hispanic employees in region VIII. If an informal discrimination complaint cannot be resolved at the regional level, the complainant may file a formal discrimination complaint, which is forwarded to HHS headquarters for investigation and processing. For the 10 complaints we reviewed, HHS headquarters generally followed EEOC-prescribed policies and procedures. In most cases, however, the complaint processing time exceeded EEOC's prescribed 180-day time frame; some cases took more than 3 years. Because discrimination complaint processing time has been a long-standing problem, HHS has two initiatives underway to reduce the processing time. (See p. 27.)

We did not obtain written comments on this report. We discussed its contents with HHS headquarters personnel and region VIII officials and, as appropriate, incorporated their comments in the report. As arranged with your office, unless its contents are announced earlier, we plan no further distribution of this report until 30 days from its issue date. At that time we will send copies to interested congressional committees and subcommittees; the Director, Office of Management and Budget; the Secretary of HHS; the regional director in HHS region VIII; and other interested parties.

If you have any questions about this report, please call me on (303) 572-7306. The major contributors to this report are listed in appendix III.

Sincerely yours,

A handwritten signature in cursive script that reads "David A. Hanna". The signature is written in dark ink and is positioned above the printed name and title.

David A. Hanna
Regional Manager

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Abbreviations

AEP	affirmative employment plan
CLF	civilian labor force
EEOC	Equal Employment Opportunity Commission
FEORP	Federal Equal Opportunity Recruitment Program
GAO	General Accounting Office
HHS	Department of Health and Human Services
IHS	Indian Health Service
OPM	Office of Personnel Management
SSA	Social Security Administration

Hispanic Representation and Equal Employment Practices in HHS Region VIII

In an October 4, 1989, letter, Senator Timothy E. Wirth expressed concerns about alleged discrimination against Hispanics by the Department of Health and Human Services' (HHS) region VIII, located in Denver. Region VIII, 1 of 10 HHS regional offices, encompasses Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming.

Based on that letter and later discussions with the Senator's office, we agreed to determine whether HHS region VIII

- employs Hispanics in representative numbers, when compared with the regional civilian labor force (CLF);¹
- develops and implements affirmative employment plans (AEPS) in accordance with federal guidelines;
- processes competitive vacancy announcements in accordance with federal policies and procedures; and
- in conjunction with HHS headquarters, processes formal discrimination complaints in compliance with federal policies and procedures.

In addition, we agreed to obtain data on certain other topics involving Hispanics, including numbers of political appointees, informal discrimination complaints and grievances, unfair labor practices, adverse personnel actions, performance awards, training opportunities, and upward mobility.

Background

In 1972, the Congress amended the Civil Rights Act of 1964 to require federal agencies to develop and implement affirmative action programs to ensure implementation of equal employment policies. These programs are intended to overcome the lingering effects of historical discrimination evidenced by the underrepresentation of minorities and women in specific agencies, regions, positions, and grade levels. The Equal Employment Opportunity Commission (EEOC) is responsible for providing agencies with guidance on their affirmative action programs, monitoring the hiring and promotion of minorities, and overseeing the discrimination complaint processes. Agencies with 500 or more employees are required to develop AEPS, annual accomplishment reports, and updates.

¹CLF data include persons 16 years of age and over, excluding those in the Armed Forces, who are employed or seeking employment. These data are developed through the nation's census, which is conducted every 10 years. The data currently used were collected in 1980.

In 1981, EEOC directed all federal agencies, including HHS, to (1) develop 5-year AEPs and (2) when necessary, establish both long-term and annual hiring goals aimed at eliminating underrepresentation for each minority group. In June 1986, EEOC directed HHS and other federal agencies to extend 5-year AEPs for 1982-86 and to continue the related affirmative action activities through September 30, 1987. In January 1988, EEOC required all agencies to develop and submit 5-year AEPs for fiscal years 1988-92. EEOC also required annual updated plans and accomplishment reports.

Additionally, the Office of Personnel Management (OPM) required HHS to prepare Federal Equal Opportunity Recruitment Program (FEORP) plans. Through such plans, federal agencies are to improve minority representation through recruiting. For the period 1982-86, AEPs and FEORP plans were combined into one document. Beginning with the period 1988-92, however, FEORP plans were to be prepared and submitted separately.

At the national level, based on EEOC and OPM directives, HHS developed guidance for its major operating divisions to follow in developing and carrying out affirmative employment and recruitment plans. Thirty-six HHS units were designated to prepare the multiyear AEP and FEORP plan covering fiscal years 1988-92. In region VIII, only the Social Security Administration (SSA)—because it has more than 1,000 employees—was required to prepare an AEP and a FEORP plan.²

According to EEOC guidance, federal agencies are to use CLF data in analyzing the representation of minorities and women in their work forces. In developing the data and establishing minority work-force standards, EEOC matched each of the approximately 420 federal job series with comparable nonfederal job categories. EEOC weighted the census data to reflect the job mix of the federal government. In calculating region VIII's minority representation, HHS is required to use the Rocky Mountain CLF data, which cover the same states as region VIII. Minority representation is further differentiated by type of job category (professional, administrative, technical, clerical, and other). The CLF data are based on the 1980 census. According to an EEOC official, CLF data from the 1990 census will be available in 1992.

²Although the Indian Health Service (IHS) in region VIII employed more than 500, HHS decided that only a national plan would be required because of the preference given to American Indians in hiring and the wide geographical dispersion of IHS offices and American Indians.

If the percentage of minorities or women in an agency is less than the percentage available in the CLF, that group is considered to be under-represented. A "manifest imbalance" is said to exist when a minority group in a specific occupational category or grade level is substantially below the group's representation in the CLF. A "conspicuous absence" is said to exist when a particular minority group is nearly or totally absent from an occupational category or grade level. EEOC and HHS encourage numerical goals when a manifest imbalance exists and require them when a conspicuous absence exists.

HHS Region VIII

HHS, the principal federal agency responsible for furthering the health of Americans and for providing human services, has 10 regional offices. Region VIII encompasses Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming. About 40 percent of the region's population resides in rural areas characterized by communities of fewer than 50,000 persons. There are 23 Indian reservations or portions of reservations within the region, with a population of about 99,000, or 12.5 percent of the nation's total American Indian population.

HHS's major functions are performed by five operating divisions: the Public Health Service, the Health Care Financing Administration, SSA, the Office of Human Development Services, and the Family Support Administration. All five divisions are represented in region VIII, and some are composed of several components. For example, the Public Health Service includes the Food and Drug Administration and IHS. For programmatic functions, each regional operating division reports to superiors at HHS headquarters. Region VIII's Office of the Regional Director is responsible primarily for providing support services to the operating divisions. Within this office is an equal employment opportunity manager, who advises the regional director and operating division heads on affirmative employment matters. Regarding such matters, both the region's operating divisions and the Office of the Regional Director report to HHS headquarters.

Table I.1 shows, by division, the number of employees in region VIII, as of September 30, 1989.

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Table I.1: HHS Region VIII Employees
(As of Sept. 30, 1989)

Region VIII unit	Number of employees
Family Support Administration	42
Health Care Financing Administration	102
Office of Human Development Services	41
Public Health Service	1,501
Social Security Administration	1,066
Office of the Secretary	99
Total	2,851

In table I.1 and throughout this report, the region VIII staff data exclude certain types of employees: (a) Senior Executive Service staff (6) and Commissioned Corps officers (315), because the region does not have hiring authority for them; (b) temporary and stay-in-school student employees, because EEOC regulations exclude them from work-force and minority representation calculations; and (c) wage-grade employees (242), because all are in the Public Health Service.

Scope and Methodology

To determine region VIII's work-force representation of Hispanics during the 1980s, we agreed to review data for fiscal years 1981, 1985, 1987, and 1989. For the other areas requested to be covered, we agreed to review the period 1980-89. However, because most documents and records were not required to be retained for this entire period, we often were limited to reviewing records for more recent years. Our work was performed in HHS's region VIII office in Denver and at HHS headquarters in Washington, D.C. In performing the review, we interviewed HHS officials and employees and obtained various agency documents and reports on the region's hiring, promotion, and other personnel practices.

Because region VIII is not required to compile and maintain minority work-force data, we calculated the region's Hispanic representation by analyzing data compiled and maintained at HHS headquarters. We obtained from headquarters computer-generated information on region VIII's work force and composition. Except for our verification of the number of Hispanics in HHS region VIII, we did not verify the accuracy of this information. We analyzed this information to determine the nature and extent of Hispanic representation in various job categories and grades for fiscal years 1981, 1985, 1987, and 1989. For each of these 4 years, we compared information on Hispanic representation with the appropriate CLF data, furnished by EEOC, to determine whether Hispanics were underrepresented in the region.

Before fiscal year 1989, region VIII work-force data included all organizational components. Starting in that year these data were also compiled with IHS excluded. Excluding IHS work-force data recognizes the special hiring preference given to American Indians by IHS.

EEOC requires each federal agency to measure minority representation against CLF data, which are based on the latest decennial census data (1980). Because the data are 10 years old, we looked for more current data. EEOC told us that CLF data based on the 1990 census would not be available until about 1992. We found no more recent data than the Rocky Mountain Region CLF data.

We verified the accuracy of the HHS headquarters-reported number of Hispanics in the region VIII work force, as of September 30, 1989. (Records could not be reconstructed to perform similar verifications for previous fiscal years.) To do so, we compared the Hispanic work-force numbers and Hispanic names on region VIII's personnel roster with the numbers and names of Hispanic employees identified for us primarily by region VIII Hispanic employment program managers.

We reviewed pertinent EEOC and OPM directives relating to affirmative action (employment) planning and reporting. EEOC's Management Directives 707, 707A, and 714 provided the applicable guidance on AEPs. We used OPM guidance to evaluate FEORP plans. We also contacted EEOC officials to discuss and obtain insights into affirmative employment requirements. We obtained available affirmative employment plans, updates, and accomplishment reports, prepared at the national headquarters level for each HHS operating division, for fiscal years 1982-87 and 1988-92. We also obtained and evaluated these divisions' national FEORP plans, to determine whether they included specific information on affirmative action and recruiting activities in region VIII. From SSA region VIII, we obtained its affirmative employment plans, updates, accomplishment reports, and FEORP plans.

We obtained and reviewed HHS and region VIII policies and procedures on processing competitive vacancy announcements and compared them to the region's practices. To determine whether the region's competitive selection process complied with applicable federal policies and procedures, we selected 19 vacancy announcements (issued between Jan. 1987 and Jan. 1990) for which at least one Hispanic had applied. None of these announcements were for IHS positions. We analyzed these announcements and the accompanying documents. We also interviewed staff in the personnel office responsible for preparing and processing

the announcements and the selecting officials for the positions filled from the selected announcements. The regional personnel office assists the operating divisions in preparing and processing the vacancy announcements, but the divisions are responsible for determining when vacancies exist and making the employee selections. Because the requester was concerned about whether Hispanics were being selected for positions at the upper grade levels, we focused our review on announcements for positions at grades 12-15.

We obtained from HHS headquarters statistical data on the numbers of formal discrimination complaints filed by Hispanics in region VIII. Of 14 formal complaints filed from 1980 to 1989, only 10 case files were available for review. We reviewed these cases to determine whether applicable EEOC and HHS policies and procedures were followed in processing them.

To determine numbers of Hispanics appointed to political positions nationwide, we obtained a list from HHS headquarters. However, this list was incomplete as records were not available on political appointees who were employed and left between 1981 and 1983. Those appointed in that period who left after 1983 were included. We also gathered statistical data on region VIII informal complaints; however, these data were not complete because no requirement exists to collect and maintain them. From the region's personnel office, we obtained data covering fiscal years 1985-90 on unfair labor practice and union grievances filed by or on behalf of Hispanics and on adverse personnel actions taken against Hispanics. To determine the extent to which Hispanics received performance awards and training opportunities, we obtained lists of employees given awards and training for fiscal years 1985, 1987, and 1989 and matched these lists with historical and current lists of Hispanic employees provided by HHS headquarters and region VIII. From records covering fiscal years 1983-89, we determined the number of Hispanics who participated in formal upward mobility training.

We conducted our work between October 1989 and May 1990 in accordance with generally accepted government auditing standards.

Representation of Hispanic Employees in Region VIII

In HHS region VIII, total Hispanic representation in the work force for the years we reviewed exceeded the Hispanic representation in the regional CLF, both with and without IHS being included. When broken out by gender and including IHS, as shown in table I.2, (1) the representation of Hispanic men was below that in the CLF for all fiscal years reviewed

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(as of Sept. 30 of each year) and (2) the representation of Hispanic women was above that in the CLF for all 4 fiscal years.

In fiscal year 1989 HHS began to report work-force data both with and without IHS data.³ As directed by law, IHS, a component of the Public Health Service, gives hiring preference to qualified American Indians. As of September 30, 1989, of the 1,266 IHS employees (44 percent of the region's work force), 907 (72 percent) were Indians. When the IHS work force was excluded, Hispanic men and women were both fully represented in region VIII's work force, as compared to the regional civilian labor force.

As shown in table I.2, when IHS employees are excluded, the Hispanic representation in region VIII is much higher, for both men and women, than that in the CLF. Excluding IHS employees, the region's 1989 Hispanic representation was 10.3 percent overall, compared to 6.0 percent including IHS employees. Hispanic male representation in 1989 was 4.7 percent excluding IHS, compared with 2.8 percent including IHS. For Hispanic females, representation was 5.6 percent excluding IHS, compared to 3.2 percent including IHS.

Table I.2: Hispanic Representation in HHS Region VIII and the Civilian Labor Force (1981-89)

Fiscal year	Percent of Hispanic employees		
	Women	Men	Total
HHS region VIII			
1981	3.1	3.1	6.2
1985	3.6	3.1	6.7
1987	3.5	3.2	6.7
1989	3.2	2.8	6.0
1989 (excluding IHS)	5.6	4.7	10.3
CLF			
1980	2.2	3.3	5.5

Note: Includes IHS except as noted in fiscal year 1989.

Between fiscal years 1981 and 1989, the number of Hispanic employees in region VIII decreased from 196 to 170—or 13.3 percent. During that period, the region's total work force decreased from 3,136 to 2,851—or 9.1 percent. Changes in the region's number of Hispanic and total

³Until January 18, 1989, IHS was part of the Health Resources and Services Administration of the Public Health Service. At that time IHS became an separate agency reporting directly to HHS's Assistant Secretary for Health.

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employees for fiscal years 1981, 1985, 1987, and 1989 are shown in table I.3.

Table I.3: Changes in Region VIII's Work Force, Including IHS (1981-89)

Fiscal year	Total number of employees	Percent change	Number of Hispanic employees	Percent change
1981	3,136	•	196	•
1985	2,890	-7.8	193	-1.5
1987	2,800	-3.1	188	-2.6
1989	2,851	1.8	170	-9.6
Net change	-285	-9.1	-26	-13.3

When broken out by job category, as shown in table I.4, region VIII's Hispanic representation exceeded that in the CLF in all but the technical job category in fiscal years 1981, 1987, and 1989. In those years, the employment of one to five additional Hispanics in the technical job category would have brought the region's representation above the CLF's. Also, between fiscal years 1987 and 1989, region VIII experienced decreases in Hispanic representation in each job category ranging from 4 to 20 percent. Excluding IHS employees increased Hispanic representation for each job category.

Table I.4: Hispanic Representation in Region VIII Work Force and Regional CLF by Job Category (Fiscal Years 1981-89)

Job category	1980 CLF ^a	Percent Hispanics in region VIII work force ^b					1989 ^c
		1981	1985	1987	1989	1989 ^c	
Professional	2.4	3.83	4.83	5.41	4.61	10.73	
Administrative	3.6	8.63	7.87	7.91	7.61	9.19	
Technical	4.5	3.74	5.15	4.39	4.22	10.07	
Clerical	5.4	6.85	8.47	9.34	7.47	13.69	
Other	3.3	7.14	0.00 ^d	0.00 ^d	0.00 ^d	0.00 ^d	
Overall	5.5	6.25	6.68	6.71	5.96	10.28	

^aExcluding American Indians from the Rocky Mountain Region CLF had a negligible effect on the overall CLF rates

^bIncludes IHS except as noted.

^cIHS excluded.

^dIn each of these years, the total number of employees in this job category was insufficient to provide meaningful statistics.

According to region VIII officials, the decrease in Hispanic representation with IHS included between 1987 and 1989 was a result of hiring freezes, budgeting constraints, and personnel ceilings.

**Hispanic Representation at
 Upper Grade Levels**

Because of concerns expressed over the representation of Hispanics at higher grade levels, we analyzed the work-force data, both including and excluding IHS, to determine Hispanic representation at grades 13 to 15, as of September 30, 1989. We examined work-force data in three grade bands—1-8, 9-12, and 13-15. Overall, at grades 13 through 15, the number of Hispanics in region VIII exceeded the number of Hispanics available for these positions in the regional CLF. In the professional job category, however, no Hispanic women were employed at these grade levels. Regional CLF data called for two Hispanic women to fill grade band 13-15 professional positions. Table I.5 shows, for fiscal year 1989, the numbers of region VIII Hispanic men and women at grades 13-15 in the professional and administrative job categories (the only categories in which the region has grade 13-15 positions), compared with the estimated numbers of Hispanics available in the regional CLF.

Table I.5: Region VIII Total Employees and Hispanics in Grades 13-15 in Fiscal Year 1989 Compared With Regional CLF

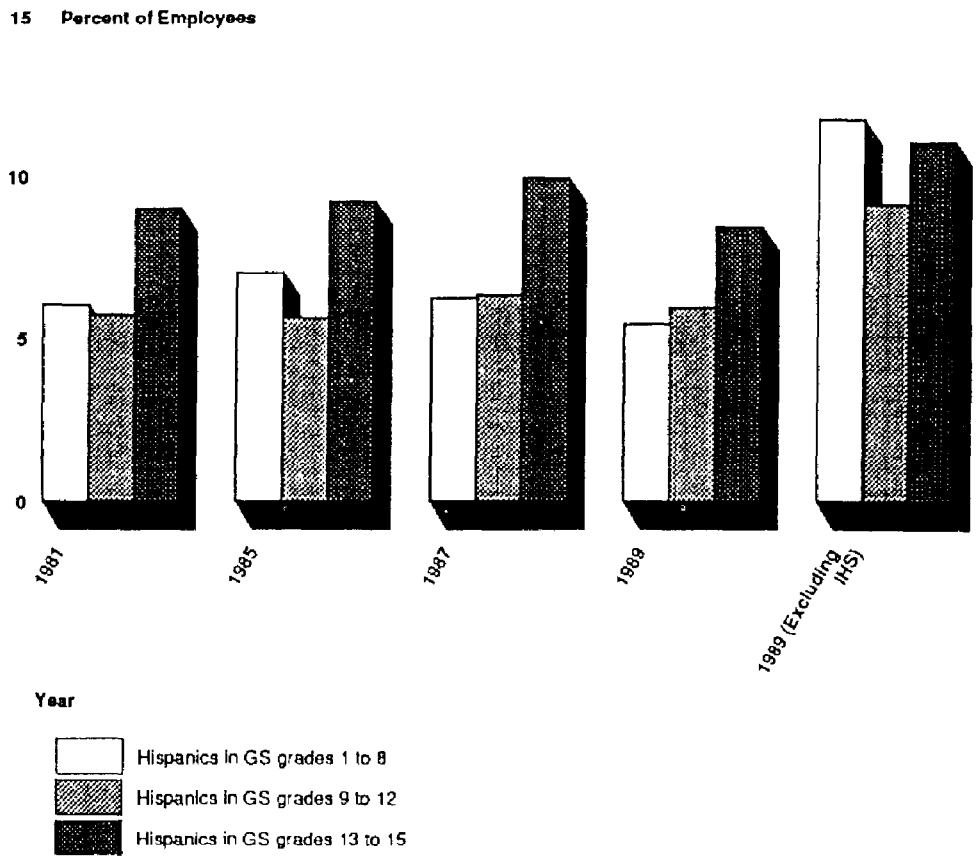
Job category	Total employees		Hispanic employees		Expected based on 1980 CLF ^a
	Including IHS	Excluding IHS	Actual		
			Including IHS	Excluding IHS	
Professional					
Men	137	87	16	12	3
Women	48	20	0	0	2
Subtotal	185	107	16	12	5
Administrative					
Men	124	88	12	12	5
Women	50	43	2	2	2
Subtotal	174	131	14	14	7
Total	359	238	30	26	12

^aDerived by multiplying the regional CLF availability rate for the professional and administrative job categories by the total number of men and women employees in each job category (e.g., 1.6 percent, the professional rate for Hispanic men x 137 professional men in the region = 2.2, or rounded upward, 3).

We also analyzed Hispanic representation, both including and excluding IHS, across the three grade bands. As a percentage of total employees in each grade band, the highest Hispanic representation was in the 13-15 grade band. In this grade band, the Hispanic representation exceeded the region's overall Hispanic representation. As a percentage of total employees in the grade band, Hispanic representation in 1987 and 1989 was also higher in grade band 9-12 than in band 1-8. With the decline in the number of Hispanics in the region, the percentage of Hispanics in each grade band declined from 1987 to 1989. Figure I.1 shows the

region's Hispanic representation by grade band and overall in 4 fiscal years. The CLF for all 4 fiscal years was 5.5 percent.

Figure I.1: Region VIII Hispanic Representation by Grade Level (1981-89)



Note: Data for 1981 to 1989 include IHS employees, except as noted

Hispanic Hires in Selected Years

Hispanics were hired at rates generally lower than their representation in the CLF in the years we reviewed. This contributed to the decrease in the region's Hispanic representation (from 6.7 to 6.0 percent) that occurred between fiscal years 1987-89. According to regional officials, hiring freezes during much of the 1980s limited the region's hiring opportunities. HHS headquarters officials pointed out that because Hispanics were generally well represented in region VIII during this period, they were not targeted for recruiting.

Appendix I
 Hispanic Representation and Equal
 Employment Practices in HHS Region VIII

Most of the hiring during the 1980s, according to regional officials, was by IHS, which must give preference to American Indians. Although HHS did not break out IHS hires from the region's total except for fiscal year 1989, data in that year showed that, of 244 total hires, 158 (65 percent) were by IHS. Of these 158 IHS hires, 99 (63 percent) were American Indians and 1 was Hispanic. Table I.6 shows the region's total and Hispanic hires in selected years during the 1980s.

Table I.6: Region VIII Hires in 5 Fiscal Years in the 1980s

Fiscal year	Number of hires		Percent Hispanic
	Total	Hispanic	
1981 ^a	43	0	0.0
1985 ^b	252	4	1.6
1987 ^b	178	11	6.2
1988 ^b	236	9	3.8
1989 ^b	244	4	1.6
1989 ^c	86	3	3.5
CLF			5.5

^aA regional official told us he believed the 1981 data did not include hires by IHS, but he was not certain.

^bIncludes IHS.

^cExcludes IHS.

Hispanic Promotions in Selected Years

HHS data showed that Hispanics have been promoted at rates comparable to their representation in the region. Table I.7 shows, for selected years reviewed in the 1980s, the region's promotions and the percentage that Hispanics received.

Appendix I
 Hispanic Representation and Equal
 Employment Practices in HHS Region VIII

Table I.7: Region VIII Promotions, Total and Hispanic, During 5 Fiscal Years in the 1980s

Fiscal year	No. of promotions		Percent of promotions for Hispanics	Hispanics as percent of work force
	Total	Hispanic		
1981 ^a	128	0	0.0	6.2
1985 ^b	471	37	7.9	6.7
1987 ^b	406	23	5.7	6.7
1988 ^b	477	32	6.7	6.5
1989 ^b	500	30	6.0	6.0
Total	1,982	122	6.2	6.4
1989 ^c	282	30 ^d	10.6	10.3

^aAccording to a regional official, the 1981 information did not include promotions in IHS.

^bIncludes IHS.

^cExcludes IHS.

^dOf the 30 Hispanic promotions, 16 were in grade band 1-8, 13 were in band 9-12, and 1 was in band 13-15.

Hispanic Population Has Increased Since the 1980 Census

In the coming years the increasing Hispanic population and work force will have an important bearing on the region's Hispanic representation. A 1988 census survey showed that the Hispanic population increased by 34 percent since 1980, and Hispanic representation in the total U.S. population increased from 6.5 to 8.1 percent. Work-force figures for 1988 showed that Hispanics represented 7.3 percent of the nation's work force, up from 6.4 percent in 1980.

Colorado had the ninth highest ratio of Hispanics in its population, with census survey estimates for 1985 showing that 11.9 percent of its population was Hispanic; the other states in the Rocky Mountain region have smaller Hispanic populations and ratios. Bureau of the Census population estimates for 1985 for these states showed Hispanic representation ranging from less than 1 percent in North and South Dakota to slightly over 5 percent in Wyoming. Bureau of Labor Statistics data showed that in Colorado, the Hispanic CLF increased by 24 percent between 1982 and 1989, when it represented about 10 percent of the state's work force. Comparable data on the work force for the other states in the Rocky Mountain Region were not available.

Region VIII Had Three More Hispanic Employees Than HHS Reported

Because concerns were expressed that HHS may overcount the number of Hispanic employees in region VIII, we verified the names of employees included in HHS's calculations. Through interviews with Hispanic Employment Program coordinators, HHS supervisors and managers, and Hispanic employees in region VIII, we obtained the names of permanent employees that were Hispanic. We compared these names with those identified as Hispanic employees on region VIII's personnel roster and the number of Hispanic employees in the work-force profile obtained from HHS headquarters.

We identified 173 Hispanic employees in region VIII—3 more than the 170 listed on the work-force profile. In addition, several other Hispanic employees were listed in the work-force profile data whom we did not attempt to verify. Region VIII officials told us these employees are assigned to organizational components (such as the Office of the Inspector General and the Centers for Disease Control) located within the region, but are officially on the personnel rolls of other regions' or headquarters' organizational components.

An HHS official believed that we identified more Hispanic employees than listed on the work-force profile because these employees probably did not identify themselves as Hispanic when they were hired. OPM regulations require agencies to collect these data, but the regulations also provide that employee self-identification is voluntary. If employees choose not to provide the data, agencies may designate the race and national origin based on visual observation, as they deem appropriate. According to a regional official, in region VIII (except for SSA) when employees choose not to provide these data, the region designates them as Caucasian. Region VIII SSA procedures provide for designation of race and national origin by visual observation when an employee refuses to provide these data.

Most Region VIII Operating Divisions Are Not Required to Prepare AEPs

Except for SSA, region VIII divisions are not required to prepare AEPs or accomplishment reports (because they have fewer than 500 employees), nor is an overall regional plan required. Similarly, except for SSA, the region VIII operating divisions are not required to prepare FEORP plans. Instead, AEPs and FEORP plans are prepared at the national level by the operating divisions, and an overall AEP is prepared nationally for HHS. On occasion, according to regional officials, the regional operating divisions are requested to participate in preparing the national division plans. The national plans and accomplishment reports, however, do not show minority representation or hiring targets by region. Moreover, the

region's operating divisions do not prepare accomplishment reports or regularly participate in preparing national accomplishment reports.

HHS headquarters operating divisions, except SSA, have not paid much attention to affirmative action in region VIII. Also, according to a region VIII official, affirmative action received little emphasis within the region during the early and mid-1980s. Further, about 3 years ago, the region converted the equal employment opportunity manager position serving the Office of the Regional Director from full to part time. The region restored this position to full time in June 1990 because the current regional director is focusing more attention on affirmative action and equal employment opportunity, regional officials said.

Region VIII operating divisions, except for SSA, compiled limited data on Hispanic representation. These officials generally knew how many Hispanic employees were employed, but they did not have the detailed information to determine how their work forces compared with the CLF. They also had data on Hispanics according to grade levels. They did not, however, compile information on the numbers of Hispanics hired and promoted. Moreover, the region's operating divisions have no requirement to report their efforts, accomplishments, or barriers relating to affirmative action. The regional director is not required to establish regional targets or devise means by which to achieve them, nor are the operating divisions accountable to the regional director for affirmative action. Rather, they are accountable to the HHS headquarters operating divisions. At the regional level, because reporting mechanisms and systematic procedures have not been implemented, little information exists to show what events led to the current rate of Hispanic representation.

SSA Prepared Multiyear Plans in 1982 and 1988

Because of the number of its employees (1,066), region VIII SSA prepared regional multiyear AEPs and FEORP plans in 1982 and 1988. It also prepared a narrative accomplishment report on its AEP in 1989; for fiscal years 1983 through 1988, it prepared statistical accomplishment reports.

In the fiscal years we reviewed, SSA's total Hispanic representation exceeded that in the CLF. Through the 1980s, SSA's Hispanic representation ranged from 8.9 to 10.2 percent, while the CLF representation was 5.5 percent. SSA region VIII's 1982 multiyear AEP and FEORP plans, however, identified a need to increase the representation of Hispanic women in the upper grade levels—grades 13 to 15—and Hispanic men at the lower grade levels—grades 1 to 8—in certain occupational series.

From SSA's statistical AEP accomplishment reports, which it prepared annually for fiscal years 1983-88, we could not determine the actions taken to improve representation in the targeted occupational series. Also, the statistical reports did not break out Hispanic representation by target group, but only showed the overall Hispanic representation. The work-force profile data showed that SSA increased the number of Hispanic women in grade band 13-15, from 0 in fiscal year 1981 to one in fiscal year 1987.

SSA's 1988 5-year AEP identified underrepresentation of Hispanics in the same grade bands and occupational series as the 1982 AEP. The SSA plan (1) identified a conspicuous absence of Hispanic women in grades 13-15 in the administrative job category (this means that Hispanic women are nearly or totally absent from the work force), (2) established a hiring goal for an 18-percent increase over 5 years for Hispanic men in the contact representative job series, and (3) set a goal for a 2-percent increase over 5 years for Hispanic men in the claims clerical job series. SSA's 1989 FEORP plan targeted Hispanic men in grades 4-7 in the contact representative job series.

According to its 1989 narrative AEP accomplishment report, SSA increased its number of Hispanic women in the administrative category. The report did not specify whether representation of Hispanic women in grades 13-15 in the administrative category had increased. However, work-force profile data showed that there had been no increase in Hispanic women in this grade band in SSA since 1985. Although SSA did not meet its target hiring goal for Hispanic men in the contact representative job series for fiscal year 1989, it achieved a 2.7-percent rate, according to the report. The report did not address the underrepresentation of Hispanic men in the claims clerical series.

Region VIII Met Most Requirements for Processing Competitive Vacancy Announcements

Region VIII generally processed competitive vacancy announcements in accordance with applicable policies and procedures, and Hispanic employees appeared to have been treated fairly in competing for vacancies. The region did not, however, compile and analyze internal applicant flow data (race, sex, and national origin data from applicants employed by HHS).

We examined the official files of 19 region VIII competitive vacancy announcements (for 24 positions) for which at least one Hispanic employee had applied to determine if the region followed HHS policies and the merit promotion provisions of HHS's nonbargaining agreements

and union contracts. None of these announcements were for an IHS position. Of the selected vacancies, which were announced from January 1987 to January 1990, 17 involved positions at grades 12 to 15, and the other 2 involved lower grades.

In the competitive vacancy announcement process, the region generally complied with the provisions of the applicable nonbargaining agreements and union contracts. In 17 of the 19 vacancy announcement packages we examined, for example, the region had specified the appropriate area of consideration (the area from which applicants would be considered) and had documented, as required, the justifications for deviations from the standard area of consideration. Two of the announcements, however, cited incorrect areas of consideration: one was announced for SSA regionwide and should have been announced HHS regionwide; the other was announced for SSA nationwide and should have been announced for HHS nationwide. According to a regional personnel official, this problem of specifying the incorrect area from which candidates will be considered has been corrected.

The official files generally contained the required documents supporting candidate ratings and selection decisions. Many files, however, did not include panel members' required narrative justifications for candidate ratings. According to the personnel officer for region VIII, panel comments are necessary to support ratings on candidates' knowledge, skills, and abilities and should always be part of the official files.

Except for SSA, region VIII divisions did not compile or analyze applicant flow data at any stage of the competitive selection process, although the data are available for internal applicants. EEOC Management Directive 707, effective January 1981 through December 1987, required these data to be collected at each stage of the selection process—total applicants, eligible applicants, best qualified applicants, and selectees. This directive stated that the collection of applicant flow data is critical in identifying barriers to full employment of underrepresented groups and in monitoring the effectiveness of recruitment efforts. EEOC Management Directive 714, which superseded this EEOC directive in January 1988, does not require the collection of applicant flow data.

HHS Circular 1608-1/720-2, dated March 29, 1982, stated that HHS operating divisions were to begin collecting applicant flow data in fiscal year 1982, in anticipation that detailed analyses would be required in later years. HHS headquarters personnel officials in their oral comments on our draft report told us that this HHS circular requiring its components,

including regional offices, to collect applicant flow data had expired in March 1984 and additional guidance concerning the collection of these data was not developed.

The federal form used by HHS to collect such data from external applicants (those outside of the agency) expired in December 1983. EEOC is developing a new form for collecting external applicant flow data.

A regional personnel official said most applicants for HHS region VIII vacancies are employed in the region or elsewhere in HHS. Because the region does not compile and analyze internal applicant data, information is not available for regional officials to determine whether Hispanics are applying for vacancies at rates comparable to their numbers in the work force. Nor can they determine whether the rates and numbers of Hispanic employees who make the best qualified list are commensurate with the rates and numbers of other minorities and nonminorities. And finally, without compiling and analyzing applicant flow data, regional officials cannot determine whether barriers may be preventing Hispanics from applying or receiving fair consideration at all steps in the competitive selection process.

Hispanics Fared Well in the Competitive Selection Process

Hispanics generally fared well in the competitive selection process, based on our analysis of the 19 vacancy announcements. Of 232 applicants for 24 positions, 29 were Hispanic, according to HHS records. Sixty-nine percent (20) of the Hispanic applicants made the best qualified list, and 24 percent (7) were selected for positions. In comparison, 59 percent (120) of the non-Hispanic applicants made the best qualified list, and 8 percent (17) were selected for positions.

We analyzed all selections (excluding IHS) made at grades 12 through 15 between January 1987 and December 1989. Of the 93 selections, 8 (or 8.6 percent) were Hispanic. Because applicant flow data are not compiled and analyzed, however, information was not available on how many Hispanic employees had applied for the positions or made the best qualified lists.

HHS Processed Discrimination Complaints in Accordance With Federal Policies and Procedures

In the cases we reviewed, HHS followed the applicable federal policies and procedures in processing formal discrimination complaints. The processing time, however, usually exceeded EEOC's prescribed time frame, which allows agencies 180 days to reach an administrative decision on a case, after which the complainant has the right to file a civil action in the courts. In some cases, more than 3 years elapsed before they were resolved. Recognizing that lengthy processing poses a problem, over the last 3 years HHS has undertaken two initiatives on a pilot basis in select regional offices and operating divisions to shorten the processing time: (1) the early complaints resolution process and (2) the negotiated discrimination complaints arbitration procedure. According to HHS officials, after additional experience is gained, these initiatives may be implemented throughout the Department.

HHS Instruction 1613-3 implements the Code of Federal Regulations (29 C.F.R. part 1613), which prescribes procedures for agencies to follow in processing discrimination complaints by federal employees or job applicants. Formal discrimination complaints can be filed for reasons other than race and national origin discrimination; age and sex discrimination, for example, are also causes for complaint.

During fiscal years 1980 to 1989, according to HHS regional and headquarters officials, 53 formal discrimination complaints were filed by 41 region VIII employees. Of the 53 complaints, 14 (or 26 percent) were filed by 11 Hispanic employees (27 percent of those filing). We reviewed 10 of those 14 complaint files. Records on the other four cases were not available for review, because either they were no longer required to be retained or the cases were pending resolution.

Other Matters Relating to Hispanic Representation in HHS Region VIII

We were also requested to obtain information on other matters relating to Hispanic employees in HHS region VIII. We obtained information on the

- number of Hispanic political appointees,
- number of informal discrimination complaints filed by Hispanics,
- number of grievances filed by Hispanic employees,
- number of unfair labor practice and union grievances filed on behalf of Hispanic employees,
- number of adverse personnel actions taken against Hispanic employees,
- extent to which Hispanic employees received performance awards, and
- extent of Hispanic employee participation in training opportunities and upward mobility programs.

We were requested to obtain this information for fiscal years 1980-89. However, because most records are not required to be retained for that length of time, we were limited to obtaining much of the information for more recent years. Also, IHS information is excluded from the following discussion because it is not compiled or maintained centrally by HHS region VIII and because gathering these data from the many, widely dispersed IHS offices would have involved considerable time and effort.

Political Appointees

HHS region VIII has only one political appointee position, the regional director, and no Hispanics have held the position since 1981. From 1981 to 1989, 23 Hispanics received political appointments in other HHS components. Twenty of these appointments were to headquarters positions, and three were to regional office positions. HHS officials told us these data may not be complete because HHS records do not include the names of those who were appointed and left HHS between 1981 and 1983. Persons appointed during that period who left HHS after 1983, however, were included.

Informal Discrimination Complaints

An informal discrimination complaint is a complaint brought by an employee as a result of an alleged discriminatory act. Resolution is first sought by discussion with a equal employment opportunity counselor, who attempts to resolve the complaint informally. If an informal resolution cannot be reached, the employee has the right to file a formal complaint. Informal complaints can be filed for reasons other than race and national origin discrimination; age and sex discrimination, for example, are also causes for complaint.

Complete region VIII data on informal discrimination complaints were not available because operating divisions are not required to compile or maintain such data or to retain such files. One operating division, SSA, however, records summary information on informal complaints filed. These records showed that 112 informal discrimination complaints were filed in fiscal years 1980 through 1989 in SSA. Of those, 16 (or 14.3 percent) were filed by Hispanic employees. Of the 16 complaints, 8 were resolved informally, 4 became formal complaints, 2 were withdrawn, and no additional information was available on the remaining 2.

Employee Grievances

A grievance involves a problem raised by an employee relating to conditions of employment. A grievance may involve two procedures: an informal procedure (stage 1), which may be resolved by written decision, or a formal procedure (stage 2), which may include fact finding by an examiner resulting in a written decision.

According to a region VIII official, between 1985 and 1989, 39 grievances were filed by region VIII employees; 4 of these, or 10.3 percent, were filed by Hispanics. Of these grievances, two were resolved partially in favor of the employees and the others were upheld on behalf of the agency. Because the region is required to retain such records for only 4 years, no data were available for the years before 1985.

Unfair Labor Practice and Union Grievances

Between 1985 and 1989, according to a regional official, unions representing region VIII employees filed four unfair labor practice grievances, one of which involved a Hispanic man, and three union grievances, one of which was filed on behalf of a Hispanic man. The regional official told us that the unfair labor practice case involving a Hispanic man was filed following a court ruling and the problem was worked out between the agency and the employee. In the grievance involving a Hispanic man, the union request for remedy was denied by HHS. Data before 1985 were not available because of the 4-year retention requirement.

Adverse Personnel Actions

Between 1985 and 1989, 40 adverse personnel actions (suspensions, dismissals, demotions, and other disciplinary actions) were taken by management against 38 region VIII employees. Of the 40 adverse actions, 7 (17.5 percent) involved Hispanic employees (1 Hispanic employee was involved in each of the 7 actions). The actions against Hispanic

employees involved four terminations, two suspensions, and one reprimand. Again, data before 1985 were not available because of the 4-year retention requirement.

Receipt of Performance Awards

HHS does not compile ethnic data on the receipt of performance awards. Accordingly, to determine the number of Hispanic employees who received awards, we compared the names of recipients in fiscal years 1985, 1987, and 1989 to the names of Hispanic employees listed in HHS's data bases.

As shown in table II.1, for these 3 fiscal years Hispanic employees received about 9 percent of the awards given to region VIII employees. The total number of awards increased significantly beginning in 1987, when the region implemented a cash awards program.

Table II.1: Hispanic Employees' Receipt of Performance Awards (Excluding IHS) (Fiscal Years 1985, 1987, and 1989)

Fiscal year	Number of awards		Percent Hispanics
	Total	Hispanic	
1985	484	44	9.1
1987	720	70	9.7
1989	1,184	99	8.4

In 1989, the portion of awards given to Hispanic employees was about 2 percent less than the regional Hispanic representation, excluding IHS, of 10.3 percent. Similar comparisons could not be made for other fiscal years because IHS data were not broken out separately.

Participation in Training and Upward Mobility Program

HHS does not compile data on training received by minority group members. Accordingly, to determine the number of Hispanic employees who participated in training opportunities, we compared the names of training activity participants to the names of Hispanic employees listed in HHS's data bases. The training data included all training activities, regardless of the length or type.

In the 3 fiscal years we reviewed, Hispanic employees participated in 11.5 percent of the training opportunities provided in region VIII, as shown in table II.2. In fiscal year 1989, Hispanic participation in training opportunities (10.2 percent) paralleled Hispanic representation in the region, excluding IHS (10.3 percent).

**Appendix II
Other Matters Relating to Hispanic
Representation in HHS Region VIII**

**Table II.2: Hispanic Employees'
Participation in Training** (Excluding IHS)
(Fiscal Years 1985, 1987, and 1989)

Fiscal year	Total participants	Hispanic participants	Percent Hispanics
1985	1,112	165	14.8
1987	1,084	100	9.2
1989	826	84	10.2
Total	3,022	349	11.5

Between 1983 and 1989, 42 region VIII employees were selected to participate in the upward mobility program. Of these, five (about 12 percent) were Hispanic employees. According to regional officials, the region's upward mobility program was limited by budgetary constraints during the 1980s.

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